Lime Down
Solar Park

The Applicant's Response to Relevant Representations (Part 1)

March 2026

Planning Inspectorate Reference: EN010168

Document Reference: EXAM/9.1

The Infrastructure Planning (Examination Procedure) Rules 2010

Rules 8(1)(c)

Lime Down Solar Park

Contents

1 Introduction

1.1 Purpose of the Document

1.1.1 An application (the Application) was made to the Secretary of State for Energy Security and Net Zero for a Development Consent Order (DCO) under section 37 of the Planning Act 2008 (PA 2008) for the Lime Down Solar Park (the Scheme). The Application was submitted by Lime Down Solar Park Limited (the Applicant) on 19 September 2025 and was accepted for examination on 17 October 2025. The examination into the Application is due to commence on 21 April 2026.

1.1.2 This document provides the Applicant's response to the Relevant Representations (RRs) submitted by statutory parties (including parties listed within the Book of Reference), as well as RRs submitted by organisations and individuals that are not statutory parties but may be considered notable. It also provides responses to a summary of key themes arising from RRs submitted by members of the public.

1.1.3 The period for registering as an Interested Party through the submission of a RR ran from Thursday 30 October 2025 to Monday 12 January 2026. The Applicant has confirmed that it has complied with sections 56 and 51 of the Planning Act 2008 and Regulation 16 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 in respect of publicising this period.

1.1.4 The Planning Inspectorate (PINS) has published a total of 4,961 RRs submitted to the Examining Authority by Interested Parties relating to the Application for the Scheme. These were published on the PINS website on Wednesday 21 January and Wednesday 4 February 2026.

1.1.5 The Applicant will be submitting their response to RRs submitted by members of the public and any non-statutory parties that are not responded to within this document at Procedural Deadline B (Wednesday 1 April 2026).

1.2 Structure of the Report

1.1.6 This document provides a response from the Applicant to the matters raised in the Relevant Representations and is structured as follows:

- **Table 1-1** sets out the list of acronyms used for management documents that form part of the Applicant's submission and may have been referred to by the Applicant in responding to RRs.
- **Table 1-2** lists the local authorities that have submitted RRs. These submissions are presented and responded to in full in **Section 2** of this document.
- **Table 1-3** lists the statutory consultees, undertakers and notable parties that have submitted RRs and with whom the Applicant has seeking to undertake a Statement of Common Ground. These submissions are presented and responded to in full in **Section 3** of this document.

- **Table 1-4** lists the statutory consultees, undertakers and notable parties that have submitted RRs and are not presented in Table 1-3. These submissions are presented and responded to in full in **Section 4** of this document.
- **Table 1-5** lists the town councils, parish councils, and parish meetings that have submitted RRs. These submissions are presented and responded to in full in **Section 5** of this document.
- **Table 1-6** lists the parties that have submitted RRs and are also listed within the **Book of Reference [APP-020]**. These submissions are presented and responded to in full in **Section 6** of this document.
- The Applicant's response to a summary of key themes arising from RRs submitted by members of the public is presented in **Section 7** of this document.

1.1.7 References to the Application documentation are provided in accordance with the referencing system set out in the Planning Inspectorate's Lime Down Solar Park Examination Library.

1.1.8 Revision suffixes have also been attached to any documents which, since submission, have been revised for and resubmitted by Procedural Deadline A to the Planning Inspectorate.

1.1.9 All documents submitted to the Planning Inspectorate on 19 September 2025 carry '/APP/' within their document reference. Submissions made to the Planning Inspectorate post-submission and during the pre-examination stage carry '/AS/' instead of '/APP/' within the document reference, to reflect the submission being made during the pre-examination stage.

Table 1-1 List of Acronyms for Submission Documents

Acronym	Document
DCO	Development Consent Order
CR	Consultation Report (shorthand for appendices)
EIA	Environmental Impact Assessment
ES	Environmental Statement
BNG	Biodiversity Net Gain
FRADS	Flood Risk Assessment and Drainage Strategy
OCEMP	Outline Construction Environmental Management Plan
OEPMP	Outline Ecological Protection and Mitigation Plan
OOEMP	Outline Operational Environmental Management Plan
ODS	Outline Decommissioning Strategy
OSRMP	Outline Soil Resources Management Plan
OSWMP	Outline Site Waste Management Plan
OPROWPPMP	Outline Public Rights of Way and Permissive Paths Management Plan
OLEMP	Outline Landscape and Ecological Management Plan
OSSCEP	Outline Skills, Supply Chain and Employment Plan
OBSMP	Outline Battery Safety Management Plan
OCTMP	Outline Construction Traffic Management Plan

Acronym	Document
EqIA	Equality Impact Assessment
OWRS	Outline Water Resources Strategy

1.3 Tables of Organisations Submitting Relevant Representations

Table 1-2 Listed Organisations whose Relevant Representations are Responded to in Section 2

Examination Library Reference	Acronym	Book of Reference Plot Number	Relevant Representation Received from
RR-4934	WC	Party not referenced in the Land and Rights Negotiations Tracker.	Wiltshire Council
RR-4402	SC	N/A	Somerset Council
RR-0455	BNESC	N/A	Bath and North East Somerset Council

Table 1-3 List of Organisations whose Relevant Representations are Responded to Section 3

Examination Library Reference	Acronym	Book of Reference Plot Number	Relevant Representation Received from
RR-1394	EA	N/A	Environment Agency
RR-1880	HE	N/A	Historic England
RR-3427	NE	N/A	Natural England
RR-0944	CNL	N/A	Cotswolds National Landscape Board
RR-3426	NH	09-018, 09-019, 09-020, 13-009, 13-006, 13-013, 13-014, 13-016, 20-001, 20-002, 21-003, 21-006, 21-007	National Highways
RR-1190	DWFR	N/A	Dorset and Wiltshire Fire & Rescue
RR-1125	DOI	Party not referenced in the Land	Defence Infrastructure Organisation

Examination Library Reference	Acronym	Book of Reference Plot Number	Relevant Representation Received from
		and Rights Negotiations Tracker.	
RR-3424	NGED	N/A	National Grid Electricity Distribution
RR-3425	NGET	16-014, 16-016, 16-019, 16-017, 16-020	National Grid Electricity Transmission Plc
RR-4647	BHS	N/A	British Horse Society (Wiltshire Access Team)
RR-4932	WBA	N/A	Wiltshire Bridleway Association

Table 1-4 List of Organisations whose Relevant Representations are Responded to in Section 4

Examination Library Reference	Acronym	Book of Reference Plot Number	Relevant Representation Received from
RR-4798	UKHSA and OHID	N/A	UK Health Security Agency and the Office for Health Improvements and Disparities (OHID)
RR-4123	RM	N/A	Royal Mail
RR-3423	NGT PLC	01-042, 01-045, 02-003, 02-005, 02-016, 03-001, 03-006, 03-014, 03-023, 03-025, 03-030, 03-035, 01-045, 02-003, 02-005, 02-006, 02-015, 02-016, 02-017, 02-018, 02-019, 02-020, 02-021, 02-022, 02-023, 03-014, 03-015, 03-016, 03-017, 03-018, 03-019, 03-020, 03-021, 03-022, 03-023, 03-024,03-025, 03-026, 03-027, 03-028, 03-029, 03-030, 03-031, 03-032, 03-033, 03-034, 03-035, 03-036, 03-037, 03-038, 03-039, 03-040, 03-041, 03-042, 03-067, 03-068, 03-078, 04-002, 04-003, 01-039, 01-046, 01-053, 01-054, 01-055, 01-056,	National Gas Transmission PLC

Examination Library Reference	Acronym	Book of Reference Plot Number	Relevant Representation Received from
		03-050, 10-006, 10-007, 01-044, 01-046, 01-047, 01-048, 01-052, 01-054, 02-002, 02-010	
RR-4652	CA	N/A	The Coal Authority (trading name The Mining Remediation Authority)
		11-011	Exolum Pipeline Ltd
RR-4086	RS	N/A	MP Roz Savage
RR-4495	SLD	N/A	Stop Lime Down
RR-0935	CAWS	N/A	Community Action: Whitley and Shaw
RR-3558	NWFOE	N/A	North Wiltshire Friends of the Earth
RR-0576	CPRE W	N/A	Campaign to Protect Rural England Wiltshire Branch
RR-1221	EDS	N/A	EATDRINKSLEEP
RR-3560	NPC	N/A	Norton Parochial Church
RR-1454	FRN	N/A	Foxley Road Nurseries
RR-1826	HHB	N/A	Helen Hood Business
RR-4494	SBS	N/A	Stop Beacon Solar
RR-0505	BSL	N/A	Big Bull Storage Limited
RR-4650	CHC	N/A	The Church of the Holy Cross
RR-2711	KMT	05-043, 06-003, 06-004, 06-005, 06-006	KMT Farming and Consultancy Limited
RR-4880	WHPR	N/A	W H P Renovations Ltd
RR-4897	WRPCIC	N/A	Wildnature Rites of Passage CIC
RR-0434	AVAS	N/A	Atlantis AV Solutions
RR-4935	WR	N/A	Wiltshire Ramblers
RR-0145	AHEL	N/A	Alicia Hawker Eventing Ltd
RR-4431	SMSECPCC	N/A	St Mary and St Ethelbert Church PCC
RR-4430	SCLB	N/A	South Cotswolds Liberal Democrats
RR-4893	WSFFP	N/A	West Street Farm Farming Partnership
RR-4315	SVS	Party not referenced in the Land and Rights Negotiations Tracker.	Sevington Victorian School
RR-4027	RBF	N/A	Roberts Berry Farm
RR-4654	VT	N/A	The Vine Tree
RR-0224	AKR	N/A	Amy Kent Rugs Ltd
RR-0456	BDPIH	N/A	BDP Imports Holdings Limited

Examination Library Reference	Acronym	Book of Reference Plot Number	Relevant Representation Received from
RR-4646	BCC	N/A	The Baraka Catering Company
RR-1793	HF	N/A	Hawker Farms
RR-0914	JA	N/A	Cllr Jon Atkey
RR-0943	CERC	N/A	Cotswolds Edge Riding Club
RR-1975	JDH	N/A	Jackdaws Coffee House
RR-4649	TCW	N/A	The Chimney Sweeper Ltd
RR-3033	MFS	N/A	Martin Fausing Smith
RR-1743	GS	Party not referenced in the Land and Rights Negotiations Tracker.	Grittleton Sevington and Leigh Delamere Village Hall and Recreation Ground
RR-4894	WMH	N/A	Whatley Manor Hotel
RR-4895	WMHS	N/A	Whatley Manor Hotel and Spa
RR-1744	GTC	N/A	Grittleton Tennis Club
RR-3841	PCVR	N/A	Practical Car and Van Rental
RR-2917	MPSL	N/A	M4 Property Solutions Limited
RR-3773	PCAP	N/A	Pewsey Community Area Partnership
RR-0915	C4KL	N/A	Clubs4Kids Ltd

Table 1-5 List of Organisations whose Relevant Representations are Responded to in Section 5

Examination Library Reference	Acronym	Relevant Representation Received from
RR-3141	MWPC	Melksham Without Parish Council
RR-1742	GPC	Grittleton Parish Council
RR-4432	SPMWPC	St Paul Malmesbury Without Parish Council
RR-0941	CTC	Corsham Town Council
RR-0504	BSPC	Biddestone & Slaughterford Parish Council
RR-2721	LBWPC	Langley Burrell Without Parish Council
RR-3443	NPC	Nettleton Parish Council
RR-0645	CCPC	Castle Combe Parish Council
RR-2701	KSMPC	Kington St Michael Parish Council
RR-4436	SSQPC	Stanton St Quintin Parish Council
RR-2873	LAPC	Luckington and Alderton Parish Council
RR-4350	SPC	Sherston Parish Council
RR-1905	HPC	Hullavington Parish Council
RR-3559	NFP	Norton and Foxley Parish
RR-1220	EGPM	Easton Grey Parish Meeting
RR-2932	MTC	Malmesbury Town Council
RR-4776	TPC	Tormarton Parish Council
RR-0979	DPC	Dauntsey Parish Council
RR-4303	SGPC	Seagrey Parish Council

Examination Library Reference	Acronym	Relevant Representation Received from
RR-4429	SPM	Sopworth Parish Meeting
RR-4941	YKPC	Yatton Keynell Parish Council
RR-4352	SHPC	Shipton Moyne Parish Council
RR-1732	GSPC	Great Somerford Parish Council
RR-2750	LGCPC	Lea, Garsdon and Cleverton Parish Council

Table 1-6 List of Parties whose Relevant Representations are Responded to in Section 6.

Examination Library Reference	Book of Reference Plot Number	Relevant Representation Received from
RR-4489	Party not referenced in the Land and Rights Negotiations Tracker.	Steven Purvis
RR-4032	Party not referenced in the Land and Rights Negotiations Tracker.	Robin Gerald Hill
RR-4846	Party not referenced in the Land and Rights Negotiations Tracker.	Victoria Knox
RR-2329	Party not referenced in the Land and Rights Negotiations Tracker.	Joel Knox
RR-2050	Party not referenced in the Land and Rights Negotiations Tracker.	James Howarth
RR-0345	Party not referenced in the Land and Rights Negotiations Tracker.	Anna Pitt
RR-3267	Party not referenced in the Land and Rights Negotiations Tracker.	Mr David Akerman
RR-3812	Party not referenced in the Land and Rights Negotiations Tracker.	Phillip Goodchild
RR-3127	Party not referenced in the Land and Rights Negotiations Tracker.	Melanie Hill
RR-2568	Party not referenced in the Land and Rights Negotiations Tracker.	Karen Hallam
RR-1494	Party not referenced in the Land and Rights Negotiations Tracker.	Gary Hill
RR-4076	Party not referenced in the Land and Rights Negotiations Tracker.	Rory Sweet
RR-4839	Party not referenced in the Land and Rights Negotiations Tracker.	Victoria Brenner

Examination Library Reference	Book of Reference Plot Number	Relevant Representation Received from
RR-3247	Party not referenced in the Land and Rights Negotiations Tracker.	Mostyn Neil Hamilton
RR-3411	10-011	Naomi Reynolds
RR-1127	Party not referenced in the Land and Rights Negotiations Tracker.	Deirdre Booty
RR-0841	03-015, 03-016, 03-017, 03-018, 03-019, 03-020, 03-021, 03-022, 03-023, 03-024, 03-025, 03-026, 03-027, 03-028, 03-029, 03-030, 03-031, 03-032, 03-033, 03-034, 03-035, 03-036, 03-037, 03-038, 03-039, 03-040, 03-041, 03-042, 03-067,03-068, 03-071, 03-072, 03-073, 03-074, 03-075, 03-077, 03-078, 03-079, 03-080, 03-014	Christopher Smith
RR-1409	Party not referenced in the Land and Rights Negotiations Tracker.	Eva Elisabeth Sweet
RR-1961	Party not referenced in the Land and Rights Negotiations Tracker.	Isobel Blackett
RR-0098	Party not referenced in the Land and Rights Negotiations Tracker.	Alexander Frost
RR-2078	Party not referenced in the Land and Rights Negotiations Tracker.	James Turner
RR-3146	16-011, 16-012, 16-013, 16-015	Carter Jonas on behalf of Messer Nicholas
RR-0949	Party not referenced in the Land and Rights Negotiations Tracker.	Craig Lance Newton Fuller
RR-2095	Party not referenced in the Land and Rights Negotiations Tracker.	Jane Andrews
RR-2041	01-039	James Gay
RR-0252	Party not referenced in the Land and Rights Negotiations Tracker.	Andrew Greenhill
RR-2674	Party not referenced in the Land and Rights Negotiations Tracker.	Kenneth T Blackmore
RR-4575	Party not referenced in the Land and Rights Negotiations Tracker.	Susan Russell
RR-3301	10-013	Mr Stephen Challis
RR-0976	Party not referenced in the Land and Rights Negotiations Tracker.	Darren Rawlings

Examination Library Reference	Book of Reference Plot Number	Relevant Representation Received from
RR-1069	Party not referenced in the Land and Rights Negotiations Tracker.	David Taylor
RR-2925	Party not referenced in the Land and Rights Negotiations Tracker.	Mairead Harrington
RR-2445	Party not referenced in the Land and Rights Negotiations Tracker.	Johnathan T Seymour-Williams
RR-1717	Party not referenced in the Land and Rights Negotiations Tracker.	Graham Lee
RR-0916	09-010, 09-011	Clyde Stanley Burgess
RR-3823	Party not referenced in the Land and Rights Negotiations Tracker.	Piers Dibben
RR-2611	09-003	Katherine Ruth Brunt
RR-4377	Party not referenced in the Land and Rights Negotiations Tracker.	Simon Gaskell
RR-4345	Party not referenced in the Land and Rights Negotiations Tracker.	Sheralyn Blackett
RR-0339	Party not referenced in the Land and Rights Negotiations Tracker.	Anna Kate Fuller
RR-4280	Party not referenced in the Land and Rights Negotiations Tracker.	Sarah Payne
RR-3970	Party not referenced in the Land and Rights Negotiations Tracker.	Richard Tanner
RR-3675	Party not referenced in the Land and Rights Negotiations Tracker.	Paul Martin Gatland
RR-3896	Party not referenced in the Land and Rights Negotiations Tracker.	Rebecca Gay
RR-3794	Party not referenced in the Land and Rights Negotiations Tracker.	Philip Miles
RR-1675	Party not referenced in the Land and Rights Negotiations Tracker.	Gillian Miles
RR-3652	Party not referenced in the Land and Rights Negotiations Tracker.	Paul Gregory
RR-4617	Party not referenced in the Land and Rights Negotiations Tracker.	Tamsyn Attiwell
RR-2178	Party not referenced in the Land and Rights Negotiations Tracker.	Janice Parker

Examination Library Reference	Book of Reference Plot Number	Relevant Representation Received from
RR-4455	Party not referenced in the Land and Rights Negotiations Tracker.	Stephen Booty
RR-1248	Party not referenced in the Land and Rights Negotiations Tracker.	Edward King
RR-2342	05-033, 05-039, 05-042	John Baillie
RR-3090	08-006	Matthew Gerard Newman
RR-3849	Party not referenced in the Land and Rights Negotiations Tracker.	Rachael Baker
RR-2469	Party not referenced in the Land and Rights Negotiations Tracker.	Joyce Kirk
RR-3583	Party not referenced in the Land and Rights Negotiations Tracker.	Olivia Frost
RR-4814	Party not referenced in the Land and Rights Negotiations Tracker.	Vanessa Shipp
RR-4707	10-011	Tim Reynolds
RR-2186	Party not referenced in the Land and Rights Negotiations Tracker.	Jason Clark
RR-4397	Party not referenced in the Land and Rights Negotiations Tracker.	Sir Michael Edward Pitt
RR-0342	Party not referenced in the Land and Rights Negotiations Tracker.	Anna Maria Pitt
RR-3782	Party not referenced in the Land and Rights Negotiations Tracker.	Philip Charles Davey
RR-3056	08-004	Mary Cole on behalf of Peter Cole
RR-2028	08-004	James Cole
RR-3018	Party not referenced in the Land and Rights Negotiations Tracker.	Mark Sturgess
RR-3669	Party not referenced in the Land and Rights Negotiations Tracker.	Paul Kirk
RR-2517	09-003	Julian Philip Edwin Brunt
RR-3131	Party not referenced in the Land and Rights Negotiations Tracker.	Melanie Sturgess
RR-0524	Party not referenced in the Land and Rights Negotiations Tracker.	Brendan Leo McCarron
RR-2261	Party not referenced in the Land and Rights Negotiations Tracker.	Jessica Phillips

Examination Library Reference	Book of Reference Plot Number	Relevant Representation Received from
RR-4591	Party not referenced in the Land and Rights Negotiations Tracker.	Susannah Dibben
RR-4557	Party not referenced in the Land and Rights Negotiations Tracker.	Susan Hunt
RR-1241	Party not referenced in the Land and Rights Negotiations Tracker.	Edward Hall
RR-3731	08-004	Peter Cole
RR-3012	Party not referenced in the Land and Rights Negotiations Tracker.	Mark Robert Michel
RR-2358	05-043, 06-003, 06-004, 06-005, 06-006	John Eavis
RR-0842	03-015, 03-016, 03-017, 03-018, 03-019, 03-020, 03-021, 03-022, 03-023, 03-024, 03-025, 03-026, 03-027, 03-028, 03-029, 03-030, 03-031, 03-032, 03-033, 03-034, 03-035, 03-036, 03-037, 03-038, 03-039, 03-040, 03-041, 03-042, 03-067, 03-068, 03-071, 03-072, 03-073, 03-074, 03-075, 03-077, 03-078, 03-079, 03-080, 03-014	Christopher Smith
RR-0542	Party not referenced in the Land and Rights Negotiations Tracker.	Bridget Marie Gregory
RR-0605	Party not referenced in the Land and Rights Negotiations Tracker.	Caroline Clark
RR-0431	08-002, 08-003, 09-012, 09-016	Ashton Hawker
RR-3086	Party not referenced in the Land and Rights Negotiations Tracker.	Matthew Dominik Shipp
RR-3034	Party not referenced in the Land and Rights Negotiations Tracker.	Martin Genner
RR-0787	Party not referenced in the Land and Rights Negotiations Tracker.	Christine King

2 The Applicant's responses to host and neighbouring Local Authorities

2.1 Wiltshire Council

Table 2-1: RR-4934

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
WC-001	Description and DCO Process	EIA Methodology	Executive Summary 2.1. Wiltshire Council is the primary host authority for the proposed Lime Down Solar Park, which spans 1,237Ha, including 749Ha of solar PV arrays and a 22km cable route corridor (CRC). It is located north of the M4, close to sensitive landscapes and ecological designations. The design life is 60 years (2029-2089). The scale and dispersed nature of the scheme raise concerns about serious cumulative impacts on landscape, ecology, heritage and communities. Significant details remain unresolved, including construction methodologies, access arrangements and embedded mitigation measures. 2.2. While national policy strongly supports renewable energy, Wiltshire's Climate Strategy commits to carbon neutrality by 2030. Local policies (Core Policy 42 and emerging Local Plan Policy 86) require robust mitigation for landscape, biodiversity, transport and heritage impacts. The council considers that compliance cannot yet be demonstrated due to outstanding	For the purposes of the Executive Summary representations, a summary of the Applicant's response is provided. For further detail and full response, please refer to the comment response which is provided following this Executive Summary section. The Applicant recognises the Scheme is located in a sensitive location and accordingly, at an early stage, developed landscape-led design principles to develop a scheme that integrates into the landscape. The **Design Approach Document [APP-268]** sets out how the Scheme has been designed to integrate into the surrounding landscape, and enhance existing natural ecological and landscape features, as well as provide improvements in PRoW facilities including the provision of 12.8 km of new permissive paths. Measures to mitigate visual effects are set out in the **Outline Landscape and Ecological Management Plan [APP-283]** to be secured through Requirement 7 in Schedule 2 to the **Draft Development Consent Order [APP-016]**.

			information and insufficient mitigation proposals. 2.3. The Applicant relies on the Rochdale Envelope for flexibility, but Wiltshire Council questions whether worst-case scenarios have been properly assessed. The Examining Authority (ExA) is asked to scrutinise whether the DCO parameters allow adequate environmental assessment and appropriate enforceable mitigation.	The Applicant has undertaken an assessment of likely cumulative effects, which is provided in each of the topic chapters of the ES and is summarised in **ES Volume 1, Chapter 21: Cumulative and In-Combination Effects [APP-073]**. In combination effect interactions during the construction, operation and decommissioning phase do not increase the significance of effects. With regard to cumulative effects, taking a conservative worse case approach, significant cumulative effects are identified at a limited and discrete number of receptors comprising tourism and recreation impacts during the construction phase on Corsham Park, PRoW WT|CORM|122, long path and Sustrans Cycle Route 403, and on skylark at a District level. The **Planning Statement [APP-267]** provides an assessment of the Scheme against national and local planning policy. **Annex B: Local Policy Accordance Tables of the Planning Statement [APP-267]** considers the Wiltshire Core Strategy (2015) and the emerging Wiltshire Local Plan, including Core Policy 42 (page 668 of the Planning Statement) and emerging Local Plan Policy 86 'Renewable Energy' (page 779 of the Planning Statement). The EIA presented within the ES has been undertaken adopting the principles set out in the Planning Inspectorate's Advice Note Nine:

				Rochdale Envelope which provides guidance regarding the degree of flexibility that may be considered appropriate within an application for development consent under the Planning Act 2008. **ES Volume 1 Chapter 6: EIA Methodology [APP-058]** sets out for each technical discipline, the maximum (and where relevant, minimum) parameters for the elements where flexibility needs to be retained have been assessed under the Rochdale Envelope approach. The approach also recognises that the worst-case parameter for one technical assessment may differ from another, ensuring that worst case overall impacts are predicted. Each technical chapter (**ES Volume 1, Chapter 7 [APP-059] to Chapter 20 [APP-072]**) describes the parameters applied in relation to the relevant assessment.
WC-002	Climate Change and Energy Need	Carbon Savings	2.4. The scheme offers long-term net carbon savings (approximately 218,000-254,000 tCO2e over 60 years) but construction emissions of circa 237,000 tCO2e will occur in the first two years; the equivalent to 4% of Wiltshire's annual emissions. Carbon break-even is not achieved until at least 2076 (council estimate) and may never be achieved in relation to whole life carbon emissions. Therefore, it is important to ensure that the long-term benefits outweigh the shorter-term impacts, on not only emissions and carbon budgets, but also the wider environmental, economic and community impacts.	As detailed in the **ES Volume 1, Chapter 7: Climate Change [APP-059]** (Paragraph 7.10.96), the net saving of 218,611–253,839 tCO2e represents the cumulative benefit across the entire 60-year lifecycle after deducting all construction, operational, and decommissioning emissions in comparison to a 'without-scheme' scenario. The carbon saving has already accounted for the construction phase emissions and so if the construction emissions were deduced from these savings, this would be double counting the construction phase emissions.

				Additionally, the **ES Volume 1, Chapter 7: Climate Change [APP-059]**, in paragraphs 7.10.65 to 7.10.69, forecast an additional carbon saving of approximately 245,696 tCO2e from the BESS grid balancing function over the Scheme's lifespan. As stated in paragraph 7.10.68, these savings have been conservatively excluded from the overall net savings figure stated above. Furthermore, the assessment in the **ES Volume 1, Chapter 7: Climate Change [APP-059]** considers the global operational Scheme emissions while the operational grid intensity only considers national emissions, resulting in an asymmetrical comparison that underestimates the Scheme's GHG savings. Regarding the assumption that the Scheme will contribute the equivalent of 4% of Wiltshire's annual emissions: The **ES Volume 1, Chapter 7: Climate Change [APP-059]** provides the Scheme's global emissions. For example, the assessment accounts for the embodied carbon of the materials and components (i.e. BESS, PV arrays, transformers, etc) which represent more than 95% of the total Scheme's emissions. Most of the materials and components are not expected to be produced within Wiltshire. Hence, it will have little impact on Wiltshire's annual territorial emissions. Additionally, most of the transport and shipping emissions will not count towards Wiltshire territorial emissions. The comparison

				presented by Wiltshire Council considers the total construction emissions while only a small percentage of the total Scheme's construc20,000tion emissions presented in the assessment will count towards Wiltshire's territorial emissions. Therefore, the scheme does not represent 4% of Wiltshire's annual emissions. At the Wiltshire Council steering group meeting on 13th January 2026, the Applicant asked Wiltshire Council if they could provide the calculations that sit behind their 2076 break-even statement. The calculations were received on 3rd March 2026. This Relevant Representation response document is being submitted at Procedural Deadline A 9th March. Comment on the calculations will be provided at a subsequent deadline.
WC-003	Landscape and Visual	Cotswolds National Landscape	2.5. The scheme will cause substantial, long-term harm to landscape character over 749Ha, in a sensitive location near the CNL. Whilst the LVIA methodology is broadly compliant with best practice, the council considers the assessment outputs are muddled, inaccurate, in places incomplete and lack transparency. Key concerns include: • Underestimation of effects on Landscape Fabric, landscape character and settlement settings • Lack of robust cumulative landscape assessment and sequential visual assessment (e.g., Fosse Way) • Embedded mitigation (hedgerows, buffers etc.) lacks clear linkage to	In terms of the comment that the Scheme will cause substantial, long-term harm to landscape character, the landscape impact of the Scheme is fully assessed in the Landscape and Visual Impact Assessment (LVIA) presented in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**. 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 **Landscape and Ecology Mitigation Plan (Environmental Statement Volume 2, Figure 3-4-1 to 3-4-5.2)**

			baseline character and may cause further harm • The draft DCO (dDCO) does not secure updates to Landscape and Ecology Mitigation Plans as the design evolves. A LEMP must be produced for the five Sites (A-E) and the CRC • The council considers compliance with Core Policy 51 ("*protect and enhance landscape character*") is impossible at this scale.	**[APP-084]**. The **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]** provides details of the proposed mitigation and enhancement which are described in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**, the **Landscape and Ecology Mitigation Plan [APP-084]**, the **OLEMP [APP-283]**, and the **Outline Ecological Protection and Mitigation Strategy (OEPMS) [APP-284]**. The LVIA presented in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]** identifies significant adverse effects to the character of the landscape within the 1km Local Study Area of the Sites, during construction and operation Year 1. This relates to the change in land use and thus landscape character from the addition of solar infrastructure, before the mitigation planting has become established. The effect is reduced to not significant from Year 15 of operation. Landscape Fabric relates to the individual tangible elements or features of the landscape, such as landform, woodland, hedges, tree cover and vegetation for example, which can be described and quantified. These physical elements and features within each of the solar Sites are predominantly retained with very low levels of hedgerow removal relating to access tracks where existing gaps cannot be utilised. The change in land use is from arable farmland and is

				considered within the assessment of effects on Landscape Character. Further clarification on the terminology and methodology used in the LVIA relating to Landscape Fabric will be provided in a technical note at P1. In relation to sequential effects on the Fosse Way Table 8-23 of **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]** identifies the following publicised routes where there are sequential visual effects • The Macmillan Way • The White Walls Way (Stage 3) • Sherston Walk 2 • The Fosse Way As the routes are made up of lots of individual sections of various footpaths, bridleways, roads etc. Table 8-33 also identifies the PRoW and Public Highway Receptors which have been fully assessed in the Visual Assessment. Sequential Effects for users of these Recreational Routes are not considered to be any greater than those effects identified for the individual sections as set out within **ES Volume 3, Appendix 8.3 series [APP-189-199].** Whilst it is recognised that there would be an appreciation of an overall increase in solar infrastructure as users of these routes move through the landscape, the discrete areas of land in the Scheme and the rolling topography of the landscape, the Scheme would not be perceived in its entirety and the

				solar panels are distributed 'in and amongst' the landscape features helping to assimilate them into the landscape. Embedded mitigation (hedgerows, buffers etc.) has been informed by the Landscape Character Assessment Guidelines set out in **ES Volume 3, Appendix 8-4 Landscape Character Area Descriptions [APP-195]** and Wiltshire's Nature Recovery Strategy to protect and enhance the landscape through the landscape- led design.

WC-004	Ecology and Biodiversity	Ecological Baseline	2.6. The council identified significant gaps in the ecological baseline data, especially for the CRC: • 17Ha un-surveyed; reliance on assumptions • No bat surveys in CRC despite proximity to Bath & Bradford-on-Avon Bats SAC and Bechstein's bat core areas around core maternity roosts • No breeding bird or wintering bird surveys in CRC • No otter, water vole, or white-clawed crayfish surveys • Great Crested Newt mitigation relies on District Level Licensing, but IACPC certificate from National England is missing • Mitigation measures (buffers, HDD under sensitive habits etc.) are welcomed but inconsistently applied. 2.7. The ExA should require the Applicant to: • Complete and submit all outstanding surveys • Adopt a precautionary approach for assumed habitats • Submit a detailed Ecological Mitigation and Enhancement Plan, Biodiversity Monitoring Strategy and enforceable BNG commitments. The BNG metric was submitted as a PDF rather than the required unlocked Excel format, which prevented full review.	The comments on ecological surveys and data are discussed in detail in the Applicant's response to paragraphs 9.58 to 9.104 in Wiltshire Council's Relevant Representation.

WC-005	Ecology and Biodiversity	Hedgerows	2.8. Furthermore, the ExA is requested to review the HRA with caution and require stipulation of the maximum extent of hedgerow that can be removed in dDCO Schedule 12, Parts 1 and 2.	The Applicant notes these comments. Hedgerow removal in the context of Habitat Regulations Assessment is addressed within the **Habitat Regulations Assessment (HRA) Report [APP-275].** In Section 8.2 of the HRA Report, and in order to minimise fragmentation impacts, the typical 25 m working width for the Cable Route Corridor will be narrowed to 12 m at all locations required for hedgerow breaches. For hedgerows lying within the Impact Zones for Bat Species, this will be a maximum of 10 m. This is secured in the **Outline Ecological Protection and Mitigation Strategy (OEPMS) [APP-284]** which in turn is secured by Requirement 8 within the **draft Development Consent Order (DCO)[APP-016].** It is therefore not necessary to include controls in relation to hedgerow removal within the main body of the DCO.

WC-006	Arboriculture	Veteran Trees and Ancient Woodland	2.9. In relation to arboriculture, the council's concerns include: • Potential impacts on 36 veteran trees and ancient woodland buffers • Lack of clarity on proposed methods and materials for construction of BESS piling and foundations near root protection areas • Insufficient detail on root protection at easement locations and for compound construction • The council will require a Detailed Arboricultural Method statement, covering foundation and piling design, facilitated pruning and arboricultural supervision within or near root protection areas including trees and hedgerows, prepared in accordance with relevant BS standards.	The comments on arboriculture are discussed in detail in the Applicant's response to paragraphs 9.14 to 10.27 in Wiltshire Council's Relevant Representation.

WC-007	Hydrology, Flood Risk and Drainage	Cumulative Assessment	2.10. The area has experienced frequent and significant flooding events. The council considers that the flood risk assessment aligns with NPPF and EA guidance, but there is limited cumulative assessment of the solar sites and CRC during construction. There is also missing linkage to Wiltshire's SuDS SPD and SFRA guidance. As there is no formal drainage strategy for the CRC, the DCO should secure detailed HDD design, riparian buffers integrated with SuDS and groundwater monitoring in source protection zone areas. Furthermore, the council requires approval for the HDD methodology at watercourse crossings.	The Applicant acknowledges that the area has experienced frequent and significant flooding events. The submitted assessment concludes that the Scheme would not increase flood risk, including during construction, with mitigation and controls secured through the Development Consent Order and outline management plans, as set out in **ES Volume 1, Chapter 11 Hydrology, Flood Risk and Drainage [APP-063]** and **Flood Risk Assessment and Drainage Strategy – Lime Down Cable Route Corridor [APP-218].** Cumulative construction-phase effects associated with the solar sites and Cable Route Corridor are addressed through the assessment framework and controlled via the **Outline Construction Environmental Management Plan (OCEMP) [APP-277]**, which secures construction drainage controls, protection of watercourses, and approval of detailed methods by the relevant consultees. Detailed design matters for HDD crossings, riparian buffers and groundwater protection within source protection zones are secured through Requirement 5 of the DCO and will be subject to approval prior to construction. To provide additional clarity, the Applicant will update **Appendix 11-1: Flood Risk Assessment and Drainage Strategy [APP-210]** to explicitly reference Wiltshire Council's SuDS SPD and SFRA guidance. These

				clarifications do not alter the assessment conclusions that the Scheme would not exacerbate existing flooding or result in off-site flood risk.

WC-008	Cultural Heritage	Listed Buildings	2.11. With regards to built heritage, further scrutiny of embedded mitigation is required and possible layout refinements for Bradfield Manor. The following issues have been identified: • Potential harm to Bradfield Manor (Grade I) and Rodbourne Conservation Area has been under-assessed • Lack of photomontages and seasonal screening analysis • No provision for mitigation monitoring and / or adaptive management.	**ES Volume 1, Chapter 12 Cultural Heritage [APP-064]**, supported by **Appendix 12.1: Heritage Statement [APP-219]**, has assessed the potential impact of the Scheme on built heritage assets, and where required appropriate mitigation has been proposed (see Section 12.9 of **ES Volume 1, Chapter 12 Cultural Heritage [APP-064]** for embedded mitigation). Site visits were undertaken with Historic England on the 28th March 2025 and the Wiltshire County Council Conservation Officer on the 11th April 2025, which included visiting land adjacent to Grade I Listed Bradfield Manor Farmhouse and Rodbourne Conservation Area. A second site visit with Historic England was undertaken in the grounds of Bradfield Manor Farmhouse on the 22nd May 2025 (see Table 12-2 in **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**). Feedback provided during the site visits was used to inform the Scheme design and assessment provided in **ES Volume 1, Chapter 12 Cultural Heritage [APP-064].** As stated in **Appendix 12.1: Heritage Statement [APP-219]** when considering the contribution of setting to the significance of the Grade I Listed Bradfield Manor Farmhouse (NHLE: 1198808), the asset is largely defined and experienced from within the Bradfield Manor Farmhouse grounds, in particular the walled courtyard to the south-west of the asset, where the full

				architectural interest of its south-facing primary elevation can be appreciated. Lime Down D is located within agricultural land to the north of asset. Following advice provided by Historic England panels in Field D5 were set back away from Grade I Listed Bradfield Manor Farmhouse and enhanced screening is proposed along existing hedgerows. Views of the proposed BESS and 400 kV Substation from Bradfield Manor Farmhouse will be largely mitigated by the proposed new woodland belt along the south-eastern boundary of Field D3 which, in combination with the existing woodland block west of D1 and south of D22, provides extensive screening in views to and from Bradfield Manor Farmhouse. It was identified that there would be a moderate / minor (not significant) adverse effect to the asset (less than substantial harm at the lower end in NPPF terms) as a result of indirect (i.e. setting) impacts. With consideration to Rodbourne Conservation Area, embedded mitigation including the removal of Fields E5 and E8 from the Scheme Order Limits, removal of panels from Fields E7, E9 and E10, offsets to the PROW and enhanced screening of existing hedgerows are considered sufficient mitigation to remove any adverse impacts to the Conservation Area. As stated in Section 3.7 of the **Outline Construction Environmental Management Plan (OCEMP) [APP-277],** construction traffic routes have

				been identified to avoid large increases in HGV movements near to heritage assets. Highway improvement works would cause at most temporary construction effects and would not result in harm to the Conservation Area's significance. Therefore, a neutral effect was identified as a result of the Scheme to the Conservation Area. The Applicant considers that the potential effects of the Scheme on the Grade I Listed Bradfield Manor Farmhouse and the Rodbourne Conservation Area have been robustly assessed and that the relevant embedded mitigation measures described above are reasonable and appropriate. **ES Volume 2, Figure 8-14 Baseline Photography and Photomontages [APP-103 to APP-104]**, which were used to inform **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]** supported by **Appendix 12.1: Heritage Statement [APP-219]**, include both summer and winter photography and as such show seasonal screening differences. Additional Heritage viewpoints were used to inform the assessment, a list of these is provided in Annex E of **Appendix 12.1: Heritage Statement [APP-219]**. The **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283],** sets out a framework for the planting, management and monitoring of

				landscaping mitigation, which is proposed as part of embedded mitigation for built heritage assets, with scope for adaptive management over the lifetime of the Scheme informed by monitoring outcomes.

WC-009	Cultural Heritage	Archaeology	2.12.Significant archaeological remains have been identified. The council cannot confirm the adequacy of archaeological protection as the mitigation strategy is incomplete: • Full trial trenching and geophysical survey of the CRC is outstanding • A Detailed Archaeological Mitigation Strategy (DAMS) has not yet been submitted, although this is required during the examination • Strip, Map and Record excavations are required for key sites • Site-Specific Written Schemes of Investigation (SSWSIs) should be produced for approval by the council • A written programme of archaeological investigation for on-site and off-site work, including analysis, publishing and archiving of the results should be produced for approval by the council • A public engagement plan is required during mitigation works.	**ES Volume 1, Chapter 12 Cultural Heritage [APP-064],** supported by appendices in **Volume 3 (12.2 to 12.6) [APP-220 to APP-230]** has assessed the potential impact of the Scheme on identified archaeological assets. Archaeological evaluation (**Appendix 12.3: Air Photo and LiDAR Mapping and Interpretation, Appendix 12.4a and 12.4b, Archaeological Geophysical Survey Reports,** and **Appendix 12.5: Interim Evaluation Trial Trenching Reports (Parts 1 to 5) [APP-222 to APP-229]**) have successfully been used to identify archaeological sites and have informed the overarching Archaeological Mitigation Strategy (AMS), which is provided in **ES Volume 3, Appendix 12.6 Archaeological Mitigation Strategy [APP-230].** During a meeting on the 19th November 2025 the progress of outstanding geophysical survey on the cable route corridor was discussed with the Wiltshire Council Archaeological Officer and it was agreed that survey would recommence in the Spring 2026 when land could be accessed. Full evaluation trial trenching reports are currently in production and will be issued to Wilshire Council and Historic England for review before being submitted into the examination at Deadline 2. As stated in Paragraph 1.1.2 of the **Outline Archaeological Mitigation Strategy [APP-230]** (Outline AMS)**,** the Outline AMS provides an overarching

				methodology for undertaking a programme of archaeological mitigation within the Scheme. Written Schemes of Investigations (WSIs) that detail site-specific mitigation measures, such as Strip, Map and Record if it is considered a viable option, will be appended to the Outline AMS in advance of each phase of mitigation works. It is intended that these WSIs will include information regarding the programme of archaeological investigation for on-site and off-site work (including analysis, publishing and archiving of the results) as well as public engagement plans, and will be approved by Wiltshire Council prior to their implementation. This approach is a common approach adopted on other consented solar DCO schemes such as Cottam and West Burton. It is secured by Requirement 12 of the draft **Development Consent Order [APP-016]** which states that no part of the Proposed Development can commence until the WSI for that part has been submitted to and approved by Wiltshire Council as the relevant planning authority. The WSIs must be substantially in accordance with the **Outline AMS [APP-230]** and must be implemented as approved. The **Outline AMS [APP-230]** has been drafted with consideration to the indicative Scheme design submitted with the DCO application for the Scheme (see the indicative site layout plan **[APP-081]**). It should be noted that

				the detailed Scheme design will be developed post consent of the DCO Application, and that without a detailed design it is not possible to produce a Detailed Archaeological Mitigation Strategy (DAMS). The Applicant highlights that an Outline AMS is a standard document that is submitted as part of Solar DCO schemes, as evidence by the consented Cottam and West Burton schemes, and site specific WSIs will be appended to the **Outline AMS [APP-230]** in advance of each phase of mitigation works. Where a DAMS has been produced to support a DCO Application, this is typically on developments where a detailed design is submitted with the DCO Application (i.e. road schemes). As detailed in Table 12-2 of **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, the Applicant has undertaken thorough consultation with the Wiltshire Council Archaeological Officer and will look to discuss comments on the Outline AMS with a view to updating the Outline AMS where necessary and appropriate.

WC-010	Transport and Access	Principal Concerns	2.13. From a highways and transport and network management perspective, the council's principal concerns are: • dDCO Articles (10, 14 and 15) weaken the council's ability to enforce highway standards as agreements under Article 15 are discretionary • Swept path analysis shows narrow minor roads cannot accommodate two-way HGV passage creating a risk of verge damage and safety issues • There is no clear mitigation for passing places or carriageway widening outside limited Highway Improvement Areas • Lack of clarity on temporary access design, reinstatement and abnormal load routing • CTMP commitments insufficient; formal agreements needed for technical approval, bonds and inspection fees.	The comments on highways, transport and network management are discussed in detail in the Applicant's response to paragraphs 14.3 to 14.9 in Wiltshire Council's Relevant Representation.
WC-011	Socio-Economics, Tourism and Recreation	PRoW	2.14. The scheme will increase pressure on PRoWs and adversely alter users' recreational experience. Therefore, the council seeks: • Provision of a £20,000 per annum index linked fund for PROW improvements • Delivery of identified improvements within the order limits • Funding for off-site enhancements through the Community Benefit Fund • Early engagement with council officers to secure accessibility standards.	The comments on PRoWs have been discussed in detail in the Applicant's response to paragraphs 12.10 to 12.14 and paragraph 18.13 in Wiltshire Council's Relevant Representation. The comments on Community Benefits have been discussed in detail in paragraphs 2.19, 15.2 and 22.4 in Wiltshire Council's Relevant Representation.

WC-012	Noise and Vibration Glint and Glare	Principal Concerns	2.15. From a public protection perspective, further analysis of noise levels is required. Operational noise from moving panels, BESS and substations requires an enforceable commitment to silencer units and enclosures. Furthermore, construction HDD works risk SOAEL exceedance. The mitigation wording in the outline Construction Environmental Management Plan must be strengthened. Whilst the air quality and dust mitigation measures appear to be broadly acceptable, robust monitoring will be required. In relation to glint and glare, the Applicant's reliance on natural vegetation growth for screening lacks evidence and assumption on height should be validated. The ambiguity over the "*optional*" fire suppression system, as noted in the Battery Safety Management Plan, must be resolved.	The comments on operational noise mitigation and noise from HDD works are discussed in detail in the Applicant's response to Paragraphs 16.12 and 16.9 respectively of Wiltshire Council's Relevant Representation. The comments on glint and glare screening and mitigation are responded to in detail in the Applicant's response to Paragraph 16.28 of Wiltshire Council's Relevant Representation.

WC-013	Socio-Economics, Tourism and Recreation	Tourism	2.16. Whilst the scheme's construction phase offers short-term GVA uplift and jobs, it will result in the loss of up to 20 FTE agricultural jobs and 50 FTE tourism jobs. There will be a reduction in tourism spending of at least £1.76m per year during construction. The long-term adverse impact on leisure and tourism businesses is contrary to Wiltshire's economic strategy. A mitigation plan is required for local businesses as well as clarity on tenanted farm viability.	This comment has been responded to within the Applicant's detailed responses to Wiltshire Council's related relevant representations below.

WC-014	Soils and Agriculture	Food Production and BMV	2.17. The scheme will result in approximately 878Ha of land removed from food production, including 30% best and most versatile land. This loss equates to approximately 5,000 tonnes of crops annually. While soil health may improve long-term, grazing under panels is uncertain. The council requires: • Evidence that a full and comprehensive assessment of availability of land, at lower level than BMV, has been conducted • Detailed soil remediation plan post-decommissioning • Pollution incident protocols and plan to be prepared and agreed by the council for the construction / decommissioning phases and for any contamination during lifetime of project • Clarity on grazing feasibility and responsibilities for protective measures.	**Assessment of effects on agricultural land and soils** The potential effects of the Scheme on agricultural land and soil resources are assessed in **ES Volume 1, Chapter 17: Soils and Agriculture [APP-069]**. The assessment considers baseline land use and agricultural land quality and evaluates likely effects during construction, operation and decommissioning. The assessment concludes that the Scheme will result in a temporary and reversible loss of agricultural land during the operational period, with land returned to its original use and condition as far as practicable following decommissioning. No permanent loss of agricultural land is anticipated. **Site selection and consideration of alternatives** An appraisal of alternative sites is presented in **ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP-056]** and **ES Volume 3, Appendix 4 1: Site Selection Assessment Report [APP-185]**. This assessment considered alternative sites within a 20 km radius of the existing National Grid Melksham Substation and concludes that there are no more suitable locations, including in relation to BMV, within the defined search area than the proposed Site. The **Site Selection Assessment Report [APP-185]** explains how brownfield land, industrial land, previously developed land and lower

				grade agricultural land were considered in accordance with policy. **Soil remediation and decommissioning** A detailed Soil Resource Management Plan (SRMP) will be prepared post consent and will be required to be in substantial accordance with the **Outline Soil Resource Management Plan [APP-280]** and is secured through Requirement 17 in Schedule 2 of the **draft DCO [APP-016].** The detailed SRMP will establish soil conditions at the time of decommissioning and set out how any requirement for remedial works will be identified. As best practice measures may evolve over the lifetime of the Scheme, the SRMP does not prescribe detailed remediation measures at this stage. Further detail on decommissioning activities will be provided within the detailed Decommissioning Environmental Management Plan (DEMP). **Pollution incident response** Measures to manage and respond to pollution incidents will be set out in the detailed Construction Environmental Management Plan (CEMP) and the detailed Decommissioning Strategy. These documents will be prepared substantially in accordance with the **Outline CEMP [APP-277]** and **Outline Decommissioning Strategy [APP-279].** The preparation and implementation of these management plans are secured through

				Requirements within Schedule 2 of the Draft DCO. **Grazing beneath panels** Whilst grazing of livestock (sheep) beneath the solar panels may be possible, this has not been relied upon as a mitigation measure within the assessment of effects on soils and agricultural land. As such, no detailed grazing strategy has been developed. If grazing were to take place during operation, no additional infrastructure or protective measures would be required, as each solar field will be enclosed by stock proof fencing and no additional panel protection would be necessary.

WC-015	Human Health	Mental Health and Wellbeing	2.18. Due to the scale of the proposed development, the scheme may have an adverse impact on the wellbeing and mental health of Wiltshire residents during all phases of the proposed development. Whilst the council is satisfied with the public health assessment methodology, the council recommends a comprehensive Community Liaison Strategy (not just Terms of Reference) is produced and secured through the DCO, which includes KPIs for engagement and wellbeing safeguards.	The Applicant has assessed the likely significant effects to human health and wellbeing in **ES Volume 1, Chapter 18: Human Health [APP-070]**, and finds that subject to implementation of mitigation measures, no significant adverse effects to human health (including mental health) are anticipated at any phase of the Scheme. The Applicant confirms that the assessment methodology has been consulted upon during pre-submission stages with Wiltshire Council's Public Health Team. The Applicant has sought to engage with communities ahead of construction through the implementation of a Community Liaison Group, as secured through Requirement 4 in Schedule 2 to the **draft DCO [APP-016]**. Whilst this group is set up for the construction phase of the Scheme, the Applicant has committed to providing a designated community contact within the Scheme's operation and maintenance team during the operational lifetime of the Scheme, with a dedicated Community Liaison Manager committed to during peak replacement events and decommissioning. This is secured through the **Outline OEMP [APP-279]** and **Outline DS [APP-279]** by Requirements 14 and 20 in Schedule 2 to the **Draft DCO [APP-016]**. The Applicant considers that the wording of Requirement 4 in Schedule 2 to the **draft DCO [APP-016]**, and the

				wording of the **OCEMP [APP-278]** to provide a Stakeholder Communications Plan (as secured through Requirements 13), together cover the level of detail being requested by Wiltshire Council. It should be noted that Wiltshire Council will be the designated discharging authority for both these requirements, and as such will be able to determine if sufficient detail has been included across these two requirements for them to be approved. The Applicant is happy to commit to drafting the Community Liaison Group Terms of Reference in reference to Suffolk County Council's Energy and Climate Adaptive Infrastructure Policy guidance on Community Engagement and Wellbeing. The production of a Stakeholder Communications Plan, or Communication Strategy would thereafter be the responsibility of the Community Liaison Group to draft following its establishment, and ahead of any construction works on the Scheme commencing.
WC-016	Community Benefits	Community Benefit Fund	2.19. The council is seeking amendments to the dDCO and further information regarding the proposed Community Benefit Fund.	As explained in the **Planning Statement [APP-267]** the Applicant has committed to a Community Benefit Fund (CBF) which will be available to fund local projects. The CBF does not form part of the DCO application, and this funding is not required to mitigate the impacts of the Scheme and accordingly cannot be taken into account in the decision-making process for determining the DCO application. Where a comment has been made about the CBF, the Applicant has

				provided a response in this table to the specific comment made.
WC-017	Description and DCO Process	Conclusion	2.20. In conclusion, Wiltshire Council acknowledges the scheme's limited long-term contribution to both local and national energy aspirations. However, impacts on Wiltshire's emissions, landscape, ecology, economy and communities are significant. The council seeks further information, mitigation, and strengthened requirements before balanced planning judgement can be made. As submitted, the council does not support the proposal.	This comment has been responded to in detail, as point repeated in Paragraph 7.1 of Wiltshire Council's Relevant Representation.

WC-018	Description and DCO Process	Introduction and Context	3. Introduction and Context 3.1. This document is Wiltshire Council's Relevant Representation in response to the submission of the Development Consent Order application to the Secretary of State for Energy Security and Net Zero by Lime Down Solar Park Limited under section 37 to the Planning Act 2008 (Planning Inspectorate Reference: EN010168). 3.2. As a Unitary Authority, Wiltshire Council provides a single tier of local government functions. It is the Highways Authority for all roads and public rights of way, which are not trunk roads. It is also the responsible authority for the implementation of a broad range of Government Regulation related to public protection and is the Local Planning Authority for the area. The Council has regulatory responsibility for managing impacts on Wiltshire's natural environment, heritage assets and landscape. As the Lead Local Flood Authority (LLFA), Wiltshire Council has a number of duties and powers to control and minimise flood risk. Furthermore, the Wiltshire Council Archaeology Service (WCAS) has a statutory duty to advise the Local Planning Authority on the impact of development proposals on archaeological remains in the county.	The Applicant notes this comment.

WC-019	Description and DCO Process	Concerns	3.3. As the primary Host Authority for the scheme, the council has a number of concerns with regards the details of the Lime Down Solar Park proposal, and has used this submission to highlight the key areas of concern, where there are outstanding questions that require answers during this process, and where there is a requirement for additional mitigation and compensation to be forthcoming in order to address or seek to address the council's concerns. The council has also identified some additional or strengthened Requirements that are considered to be necessary. 3.4. However, it is important to note that the DCO represents the preliminary / outline design for the scheme and further detail will emerge during the examination process and once the detailed design is developed. Significant information was only made available to the council immediately prior to application submission or at application acceptance, therefore the council's detailed assessment of the scheme is still on-going. 3.5. The issues raised herein are intended as a summary to assist the Examining Authority in the identification of the principal issues for examination. This response is without prejudice to any further representations the council will make throughout the examination process including detail submitted to the Examining Authority within the council's Written Representation, Local	The Applicant notes this comment. The Applicant held Officers and Members Briefings in January 2025 and since February 2025 has held a monthly Steering Group meeting with Wiltshire Council where it has sought to clarify issues and provide information, when that information has become available. The Steering Group meetings are ongoing and provide an opportunity for Wiltshire Council to raise technical matters for discussion with the Applicant. In addition, further ongoing engagement has been undertaken between the Applicant's project team and their technical officer counterparts at Wiltshire Council in order to aid understanding and provide information on technical points. The Statement of Common Ground with Wiltshire Council, to be submitted at Deadline 1, will set out the record of engagement with Wiltshire Council.

			Impact Report and through its Statement of Common Ground with the Applicant.	

WC-020	Description and DCO Process	The Scheme and Application Site	4. The Scheme and Application Site 4.1. The development is known as Lime Down Solar Park and is described within the Applicant's submission to comprise a solar photovoltaic (PV) electricity generating station of over 100 megawatts (MW) and associated development comprising Battery Energy Storage System (BESS) Area, substations, grid connection infrastructure and other infrastructure integral to the construction, operation and maintenance, and decommissioning phases. The design life of the Scheme is 60 years with decommissioning expected to take place 60 years after final commissioning (the design life is stated to be 2029-2089). 4.2. The application site is stated as extending to some 1,237 Ha and is largely situated within the administrative area of Wiltshire north of the M4 corridor, albeit with the grid connection route extending south to the substation at Melksham town. A small area of the application site is within areas of highway administered by South Gloucestershire Council. The site comprises predominantly agricultural fields and rural villages, including Sherston, Luckington, Corston, Hullavington, Rodbourne, as well as the town of Malmesbury. The cable route corridor is described as running for approximately 22km from the body of the solar panel development to the existing sub-station at Melksham. The	The Applicant notes Wiltshire Council's description of the Scheme and Application Site.

			application states that the area of the solar PV extends to some 749.3Ha, with the cable route corridor described as extending to some 463.2Ha. 4.3. The land identified as accommodating the solar PV primarily comprise agricultural fields with gently undulating topography, delineated by hedgerows, hedgerow trees, scattered woodland and woodland blocks. The Fosse Way, a Roman road built between Exeter and Lincoln (now part road and part PRoW), runs through the solar PV site. Watercourses within the solar PV site include Gauze Brook and Gabriel Well River running through the eastern extent of the site, as well as various unnamed drains. The landscape is described as fields, woodland and nearby rural villages, including Sherston, Luckington, Corston, Hullavington, Rodbourne and the town of Malmesbury. There are also several individual farm holdings, rural dwellings and small commercial business properties in the vicinity of the Solar PV. The Great Western Railway South Wales Main Line runs east to west through the body of the Solar PV site. The River Avon is located approximately 240 m north.	

WC-021	Description and DCO Process	Cable Route Corridor	4.4. The cable route corridor element of the application site is described as having a variable width from 50m, up to 665 m in some locations to provide space for what is described as "*trenchless construction techniques*" and temporary construction compounds, or to provide a wider area to allow space to avoid features such as trees, hedgerows and field boundaries. 4.5. The land within the Cable Route Corridor predominantly comprises agricultural fields, bordering hedgerows and short sections of road and railway line where crossings are required (including a crossing of the M4 motorway). The Cable Route Corridor is intersected by various tributaries associated with the River Avon. 4.6. The landscape surrounding the Cable Route Corridor comprises further agricultural fields, hedgerows, woodland and villages such as Grittleton (bordering to the west), Yatton Keynell (approximately 220 m to the west) and the towns of Chippenham, Corsham and Melksham towards the southern section of the cable route corridor.	The Applicant notes Wiltshire Councils description of the Scheme and Application Site.
WC-022	Landscape and Visual	Cotswolds National Landscape	4.7. The application site is not within any landscape designation, but the Order Limits extend up to the boundary of the Cotswolds National Landscape (CNL) and Lime Down Sites A, B and C are considered to fall within the setting of the CNL. However, minor highway improvement works would be undertaken within the CNL.	The Applicant confirms that the Cotswolds National Landscape (CNL) is located adjacent to the Order Limits and that minor highway works would be undertaken in the CNL, which would comprise minor road widening at the locations shown on the **Works Plan [APP-007]**. Sheets 18, 20 and 21 include the works, and works number 8A states that these are temporary. The

				works include minor road widening into the verge and in the public highway.
WC-023	Ecology and Biodiversity	Ecological Sites	Similarly, whilst the application site is not within any ecological designation, there are four statutory internationally designated ecological sites located within 30 km. These include the Bath and Bradford on Avon Bats Special Area of Conservation (SAC), Severn Estuary Special Protection Area (SPA) and Ramsar, and Salisbury Plain SPA. There are four statutory nationally designated ecological sites located outside of, but within 5 km of the application site. These are Harries Ground, Rodbourne Site of Special Scientific Interest (SSSI); Corston Quarry and Pond Local Nature Reserve (LNR); Sutton Lane Meadows SSSI; and Conygre Mead LNR. There are 37 non-statutory locally designated sites located outside of, but within 2 km of, the application site. These comprise 36 Local Wildlife Sites (LWS) and one Protected Road Verge. There are no World Heritage Sites, Registered Battlefields, or Protected Wrecks within 2 km of the solar PV and 250 m of the cable route corridor. No designated heritage assets are located within the solar PV site, however, various Listed Buildings, Scheduled Monuments, Conservation Areas are located within 2 km of the Solar PV Sites.	The Applicant notes Wiltshire Councils description of the ecological baseline within and beyond the Order Limits.

WC-024	Climate Change and Energy Need	National and Local Policy Context for Low Carbon Energy Developments	5. National and Local Policy Context for Low Carbon Energy Developments 5.1. The applicant sets out the legislative and planning policy context for the project in Section 6 of 7.2 to their Planning Statement [APP-267]. 5.2. Paragraph 165 of the National Planning Policy Framework (NPPF) requires local plans to help increase the use and supply of renewable and low-carbon energy whilst ensuring that adverse impacts are addressed appropriately. The scheme is also aligned with the NPPF's requirement for the planning system to support the transition to a low carbon future, with recent revisions advising at NPPF paragraph 168(a): When determining planning applications for all forms of renewable and low carbon energy developments and their associated infrastructure, local planning authorities should: a) not require applicants to demonstrate the overall need for renewable or low carbon energy, and give significant weight to the benefits associated with renewable and low carbon energy generation and the proposal's contribution to a net zero future. 5.3. National Policy Statements for Energy EN-1, EN-3 and EN-5, offer significant support for NSIP renewable energy development. Furthermore, both the last and the current government have issued Written Ministerial Statements (WMS) confirming the importance of renewable energy development.	Noted. The Applicant's **Statement of Need [APP-266]** also explains how and why the Scheme addresses all relevant aspects of government policy, including national policy. Notably, Section 3.5 of the **Statement of Need [APP-266]** includes the government's view that the UK has huge potential for solar power and that solar energy is at the heart of the Clean Power 2030 Mission [NPS EN-3 (2025), Paras 2.10.1 & 2.10.2] The NPPF and Energy NPSs EN-1, EN-3 and EN-5, confirm that substantial weight should be given to the carbon benefits of renewable generation, without requiring applicants to demonstrate overall need. The Project therefore aligns with the established policy imperative to accelerate the transition to a net zero energy system. The **Planning Statement [APP-267]** provides a detailed assessment of the Scheme against national and local planning policy, including the Energy NPSs, the NPPF, the Wiltshire Core Strategy, and the emerging Wiltshire Local Plan.

WC-025	Climate Change and Energy Need	National and Local Policy Context for Low Carbon Energy Developments	5.4. In line with national legislation and guidance, Wiltshire Council has made a firm commitment to becoming a carbon neutral council by 2030. The Wiltshire Climate Strategy reiterates this commitment and expresses objectives that include renewable energy generation as part of the efficient and environmentally sensitive use of land, providing for the needs of an increasing population and nature. 5.5. Policies CP1 and CP2 of the Wiltshire Core Strategy relate to the spatial strategy for Wilshire, setting the policy foundations for the promotion of sustainable development within the county. The scheme is for a standalone renewable energy installation and will not directly impact existing housing or employment sites. The scheme will result in some employment provision in the form of construction jobs but does not relate explicitly to employment development.	The Scheme directly supports Wiltshire Council's objective of achieving carbon neutrality by 2030 by delivering a substantial, long-term source of renewable energy generation. As set out in **ES Volume 1, Chapter 7: Climate Change [APP-059]**, the Solar PV and BESS installation will make a meaningful contribution to national and local decarbonisation targets by displacing electricity generated from fossil-fuel sources over its 60-year operational life. The assessment demonstrates that operational greenhouse gas emissions are negligible and that the scheme will result in a significant net reduction in UK emissions, aligning with both the Wiltshire Climate Strategy and national commitments under the Climate Change Act. With regard to Core Policies CP1 and CP2, the Scheme is consistent with the strategic objective of promoting sustainable development and the transition to a low-carbon energy system. Although the Scheme is not employment-led and does not relate to housing delivery, it does not conflict with existing allocations or growth areas and will generate temporary construction employment alongside wider economic benefits associated with supporting energy security and decarbonisation. The Climate Change assessment concludes that the Scheme represents an appropriate and sustainable use of land for renewable energy infrastructure, complementing

				Wiltshire's spatial strategy and climate ambitions. The Applicant has furthermore sought to support ongoing skills and employment opportunities through the measures set out in the **OSSCEP [APP-285]**, secured by Requirement 18 in Schedule 2 to the **Draft DCO [APP-016]**, to help increase business activity and local skill capabilities in Wiltshire during the construction, operational, and decommissioning phases of the Scheme, thus contributing to strategic aims for economic development in the county of Wiltshire.
WC-026	Description and DCO Process	National and Local Policy Context for Low Carbon Energy Developments	5.6. Policy CP42 of the Wiltshire Core Strategy expresses that proposals for standalone renewable energy schemes will be supported where it has been demonstrated that impacts (both individual and cumulative) specific to following factors (relevant to this scheme) have been satisfactorily considered: (i) The landscape, particularly in and around Areas of Outstanding National Beauty (AONBs) (iv) Biodiversity (v) The historic environment […] (vi) Use of the local transport network (vii) Residential amenity, including noise, odour, visual amenity and safety (viii) Best and most versatile agricultural land	The Applicant notes this comment. Annex B of the **Planning Statement [APP-267]** provides an assessment of the Scheme against Core Policy CP42 'Standalone Renewable Energy Installations' (page 668 of the Planning Statement).

WC-027	Description and DCO Process	National and Local Policy Context for Low Carbon Energy Developments	5.7. The cable connection search corridor passes through the Chippenham Neighbourhood Plan area. Policy SCC3 of the Chippenham Neighbourhood Plan reiterates the aims of CP42 expressing that proposals for standalone renewable energy development will be supported where all the following factors have been robustly demonstrated: a) the costs and benefits compare favourably with potentially less intrusive options, such as large scale building mounted renewable energy b) a comprehensive landscape impact assessment has been undertaken which has informed the proposals for the location of new infrastructure and all mitigation measures identified in that are implemented c) the wider benefits of providing energy from renewable sources, including contributions to national carbon reduction objectives and targets, outweigh any adverse impacts on the local environment or amenity, including any cumulative adverse impacts from existing or planned renewable energy developments; and d) additional social, economic or environmental benefits which benefit the local community over the lifetime of the project are provided. 5.8. Policy SCC3 further expresses that any proposal for a community energy project, where there is full or partial community ownership involvement, will be strongly supported.	The Applicant notes this comment. Annex B of the **Planning Statement [APP-267]** provides an assessment of the Scheme against Core Policy CP42 'Standalone Renewable Energy Installations' (page 668 of the Planning Statement). As the Chippenham Neighbourhood Plan area falls outside of the Order Limits, policy SCC3 has not been considered in the planning appraisal set out in the **Planning Statement [APP-267]**.

WC-028	Climate Change and Energy Need Community Benefits	National and Local Policy Context for Low Carbon Energy Developments	5.9. Wiltshire Council's Climate Strategy and delivery plans are supportive of renewable energy generation, subject to assessment of impacts. In particular, the council is supportive of community energy, and there are community energy organisations operating within Wiltshire which would be able to support a shared ownership model of delivery, enabling the community to benefit financially from the Scheme.	The Scheme directly supports Wiltshire Council's objective of achieving carbon neutrality by 2030 by delivering a substantial, long-term source of renewable energy generation. As set out in **ES Volume 1, Chapter 7: Climate Change [APP-059]**, the Solar PV and BESS installation will make a meaningful contribution to national and local decarbonisation targets by displacing electricity generated from fossil-fuel sources over its 60-year operational life. Due to the nature of the grid connection agreement, the Applicant cannot determine where the exported electricity is ultimately consumed. Notwithstanding this, the Scheme will contribute materially to decarbonising the UK grid and therefore support increased availability of low-carbon electricity in Wiltshire more generally. Recognising the importance of enabling local benefit, the Applicant has already established a Community Benefit Fund to provide direct financial support to local projects over the lifetime of the Scheme, complementing wider socioeconomic and environmental benefits delivered through the design and mitigation strategy.

WC-029	Climate Change and Energy Need	National and Local Policy Context for Low Carbon Energy Developments	5.10. In summary, the principle of proposals for renewable energy development receives broad support from local planning policies CP42 to the Wiltshire Core Strategy and policy SCC3 to the Chippenham Neighbourhood Plan, as well as supporting Wiltshire's Green and Blue Infrastructure and Climate strategies, provided that they are suitably located and sufficiently mitigate any adverse development specific and cumulative environmental effects. As set out in this response, further information is required from the Applicant before the council can make an objective balanced planning judgement on the merits of the proposed scheme and therefore adequately assess its compliance with the aforementioned key policies.	The Applicant notes this comment. The Scheme's compliance with local planning policies is set out in Annex B of the **Planning Statement [APP-267]** which provides an assessment of the Scheme against Core Policy CP42 of the Wiltshire Core Strategy. As the Chippenham Neighbourhood Plan area falls outside of the Order Limits, policy SCC3 has not been considered in the planning appraisal set out in the **Planning Statement [APP-267]**.
WC-030	Description and DCO Process	Policy Considerations	Policy Considerations 6.1. The Applicant intends for the Planning Statement to be read in conjunction with 7.1 Statement of Need [APP-266], which explains how the project responds to the relevant aspects of national policy. This includes evidence to support the suitability of the proposed location of the project, including whether the proposed connection point is suitable. 6.2. Section 8 of 7.2 Planning Statement [APP-267] sets out the Applicant's appraisal of the project's compliance with the main relevant policy and legislative requirements. 'Annex A: National Policy Accordance Tables' and 'Annex B: Local Policy Accordance Tables' appended to the Planning Statement provide a more	The Applicant notes this comment.

			detailed assessment of how the project accords with relevant policies.	
WC-031	Description and DCO Process	Environmental Assessment Considerations	Environmental Assessment Considerations 6.3. The Environmental Statement does not assess whether the project accords with planning policy, this is presented in 7.2 Planning Statement [APP-267]. 6.4. However, in line with NPS requirements the Applicant has set out in 6.3 Environmental Statement Volume 3, Appendix 4-1 Site Selection Assessment Report [APP-185] information about the approach taken by the Applicant to identify the proposed location for the project and evaluate whether this is a suitable location for a large-scale solar development. 6.5. The report notes that there is no prescribed methodology in national planning policy or guidance for site selection in relation to solar development. The Applicant has therefore followed a six-stage approach to identify and evaluate the proposed location. 6.6. Wiltshire Council will address relevant local planning policies in its Local Impact Report (LIR).	The Applicant notes this comment.

WC-032	Climate Change and Energy Need	Climate Change Consideration	7. Climate Change Considerations Environmental Assessment Considerations 7.1. Wiltshire Council's climate team does not have any detailed comments to make further to its representation at the statutory consultation stage. It is noted that the Applicant has acknowledged the comments and responded with more detail. However, the council's climate team does have some observations from a strategic level, as follows. 7.2. Officers' note the figures provided in ES Vol 1, 6.1 Chapter 7 Climate Change [APP-059] for energy generation and greenhouse gas emissions over the lifetime of the scheme (60 years). It is noted that net carbon emissions savings are estimated up to 253,839 tCO2e, whilst overall lifetime emissions of the project are estimated to be 933,140 tCO2e, and that the largest proportion of emissions are associated with the construction phase, with additional emissions during operational (maintenance) and decommissioning phases. 7.3. Total lifetime energy generation is estimated to be between 23.54 and 24.26 TW, although it is queried whether this should be TWh, over the 60-year scheme lifespan, which has been estimated to result in the scheme having a net positive impact on emissions reduction, in the region of 218,611 tCO2e or 253,839 tCO2e	Regarding 7.2: As detailed in **ES Volume 1, Chapter 7: Climate Change [APP-059]** (Paragraph 7.10.96), the net saving of 218,611–253,839 tCO2e represent the cumulative benefit across the entire 60-year lifecycle after deducting all construction, operational, and decommissioning emissions. Regarding 7.3: While the **ES Volume 1, Chapter 7: Climate Change [APP-059]** states: "*The total energy generated by the Scheme would be around 23.54 TWh and 24.26 TW over the 60-year Scheme lifespan for tracker and fixed panels respectively."* It should be noted that the second unit should also be "*TWh*". Regarding 7.4: **ES Volume 1, Chapter 7: Climate Change [APP-059]** states in Table 7-23 that the annualised emissions from the construction of the Scheme contribute to equal or less than 0.030% and 0.034% of the 4th (2023-2027) and 5th (2028-2032) carbon budgets respectively. It is worth noting that UK carbon budgets only account for national emissions while the assessment presented in the chapter considers the Scheme's global emissions (i.e., including upstream and downstream emissions created in other countries) thereby presenting a conservative approach to the Scheme's contribution to the UK carbon budgets. Schemes that reduce the carbon intensity of the grid, like Lime Down, are required to decarbonise the power

			depending on the technology used. 7.4. The lifetime savings of the scheme are therefore significant; however, timing is critical. The fact is that the GHG emissions in the construction phase are substantial, and these will be emitted at a time when the UK is aiming to reduce emissions year on year, towards being net zero by 2050. The proposal does not currently make it clear that carbon emissions are going to increase as a result of the project in the short and medium term, in order to achieve longer term gain in emissions reduction, and a decision must transparently consider these impacts. 7.5. The submitted document highlights that the manufacture of the components is the major contributor to the scheme's GHG emissions and total construction emissions are estimated at 237,149 tCO2e, which take place during the first two years (2027 and 2028). To provide a sense of scale and significance, this would equate to 118,575 tCO2e per year on average, approximately 4% of Wiltshire's annual territorial emissions in 2023 (2025 DESNZ data), which is equivalent to the current emissions from the waste sector in Wiltshire. In terms of local impact, this project will therefore significantly impact on the county of Wiltshire's ability to reduce short- and medium-term emissions and to be carbon neutral by 2030 or even by 2050. Furthermore, given the scheme's timescales, it is unlikely to contribute to the council's ambition for the county of	sector and achieve UK's net zero objectives and reduce the global impact of GHG emissions. Regarding 7.5: **ES Volume 1, Chapter 7: Climate Change [APP-059]** provides the Scheme's global emissions. For example, the assessment accounts for the embodied carbon of the materials and components, which represent more than 95% of the total Scheme emissions and are unlikely to be produced in Wiltshire or impact Wiltshire's annual territorial emissions. Additionally, most of the transport and shipping emissions will not count towards Wiltshire territorial emissions. The comparison presented by Wiltshire Council considers the total construction emissions while only a small percentage of the total Scheme's construction emissions presented in the assessment will count towards Wiltshire territorial emissions. Once operational, the Scheme will contribute to reducing carbon emissions both locally and nationally by generating significant quantities of low-carbon energy to displace fossil fuel use in power, heat, transport and industry and reduce associated carbon emissions. Regarding 7.6: At the Wiltshire Council steering group meeting on 13th January 2026, the Applicant asked Wiltshire Council if they could please provide the calculations that sit behind their 2076 break-even statement. As of February

			Wiltshire to be carbon neutral by 2030, given that it will have been operational for a maximum of 1-year period by then. 7.6. So whilst the overall emissions across the 60 year project lifetime provide a net benefit, consideration must be given to the fact that the scheme's total GHG emissions, are significant (at 933,140 tCO2e) and by the council's calculations, this means that the scheme does not start to break even in terms of whole life carbon emissions until at least 2076, 47 years into the scheme, if at all.	2026, the calculations have not been received. As the Scheme will require replacement of components, and will generate some minimal emissions during operation, it is not considered that a 'break-even' date is a useful measure of the scheme's beneficial effect. However, as the GHG electricity generation intensity figure for the Scheme is anticipated to sit continually below the forecast grid average for 2029, GHG emissions savings are expected to be achieved throughout the lifetime of the Scheme compared to a generation scenario in the absence of the Scheme. Therefore, the GHG emissions during construction, operation, and decommissioning of the Scheme can be considered to be 'offset' by the net positive impact of the Scheme on GHG emissions and the UK's ability to meet its carbon targets. Please see previous responses for further clarification of the Scheme's carbon net savings.

WC-033	Climate Change and Energy Need	Climate Change Consideration	7.7. The scheme is expected to start to generate clean energy from 2029, and there are additionally the benefits of the BESS that should help to balance the electricity supply and demand. However, the positive impacts over the long term should be considered transparently in the context of the GHG emissions in any given year and their effect on the UK carbon budgets and the necessary emissions reduction to 2050.	As explained in the responses to Sections 7.4 and 7.5 above, the Scheme's construction emissions represent only a very small fraction of the relevant UK carbon budgets, and the assessment takes a conservative approach by using global rather than UK-territorial emissions. The majority of these emissions arise from embodied carbon and transport outside Wiltshire and would not contribute to Wiltshire's local emissions inventory. As set out earlier, the Scheme will subsequently deliver sustained carbon reductions by displacing fossil-fuel-based generation and lowering the carbon intensity of the national grid. These operational benefits are essential for meeting the UK's statutory carbon budgets and progressing towards net zero.
WC-034	Climate Change and Energy Need	Climate Change Consideration	7.8. It is acknowledged that the methodology follows guidance that the appropriate approach is to consider the scheme's emissions in the context of UK carbon budgets as they are considered to be inherently cumulative (para 7.13.4).	The Applicant notes Wiltshire Council's comments on the methodology used within **ES Volume 1, Chapter 7: Climate Change [APP-059]**.
WC-035	Climate Change and Energy Need	Climate Change Consideration	7.9. This results in a conclusion that the impacts are low, however it is difficult to be sure from the assessment firstly whether the emissions during the construction and early years of the scheme (during the 4th and 5th carbon budgets 'CB4' and CB5') could be further reduced, and secondly whether this specific scheme and its impacts (estimated to be just under 0.5% of CB4 and CB5) is a good use of those	The assessment has tended to use conservative assumptions wherever appropriate to provide a realistic worst-case scenario in terms of emissions. In practice it is likely that emissions will be lower than those reported. Notwithstanding this, there will be every effort through each phase of the scheme to reduce emissions wherever possible (please refer to Section 7.9 of

			carbon budgets. Officers observe that in the absence of a national Strategic Spatial Energy Plan it is not clear how this outcome would be assessed.	**ES Volume 1, Chapter 7: Climate Change [APP-059]** for further detail on specific embedded mitigation measures proposed to avoid and reduce the impacts and effects of climate change). These measures are set in the **Outline CEMP [APP-277]**, **Outline OEMP [APP-278]** and **Outline Decommissioning Strategy [APP-279]** respectively. These management plans will be developed into detailed documents and secured via requirements as set out in the **draft DCO [APP-016]**.

WC-036	Climate Change and Energy Need	Climate Change Consideration	7.10. It is acknowledged that in the government's Clean Power Plan 2030 and the Carbon Budget and Growth Delivery Plan a rapid deployment of ground mounted solar is necessary and should be supported by the planning system. However, it is also noted that the national policies are estimated to result in negative carbon savings during CB4, with positive savings from CB5 onwards (Carbon Budget and Growth Delivery Plan, Technical Summary, Appendix B, Table 4. Item 118 and 122). 7.11. Against this context that the current national policy to rapidly increase the deployment of solar will contribute to an increase in emissions, exceeding CB4, the ExA is asked to consider whether this particular scheme is a nationally strategic priority, and an appropriate scale and location, when considered alongside other proposed and planned development for power generation, homes, industry etc. within the CB4 carbon budget timeframe.	**ES Volume 1, Chapter 7: Climate Change [APP-059]** states in Table 7-23 that the annualised emissions from the construction of the Scheme contribute to equal or less than 0.030% and 0.034% of the 4th (2023-2027) and 5th (2028-2032) carbon budgets respectively. It is worth noting that UK carbon budgets only account for national emissions while the assessment presented in the chapter considers the Scheme's global emissions (i.e., including upstream and downstream emissions created in other countries) thereby presenting a conservative approach to the Scheme's contribution to the UK carbon budgets. Schemes that reduce the carbon intensity of the grid, like Lime Down, are required to decarbonise the power sector and achieve UK's net zero objectives and reduce the global impact of GHG emissions. The **Statement of Need [APP-266]** describes that there is an urgent and unprecedented need for new low carbon generation in the UK to meet our climate change, energy security and affordability targets. Further, the Government considers that a secure, reliable, affordable, net zero consistent system in 2050 is likely to be composed predominantly of wind and solar (NPS EN-1, Para 3.3.20). Section 2.9 of the **Statement of Need [APP-266]** describes that the government is seeking a large capacity of new low carbon schemes to come

				forwards to prioritise projects needed for 2030, while maintaining a robust pipeline of projects beyond 2030 towards meeting net zero by 2050. The Scheme has received notification that, as part of NESO's connection queue reprioritisation process, the solar component of the scheme has been re-prioritised as a Gate 2 Phase 1 connection (i.e. connecting in 2030 or earlier) and that the BESS component of the Scheme has been re-prioritised as a Gate 1 connection. The indicative connection date of the BESS has not yet been confirmed. National Policy Statement EN-1 also states that the Secretary of State should assess all applications for development consent for the types of infrastructure included by the NPS (including solar) on the basis that there is demonstrated urgent need for them, that substantial weight should be given to this need, and that the Secretary of State is not required to consider the specific contribution of any individual project to be satisfied that need is established [EN-1 Paras 3.2.6 - 3.2.8]. This representation goes to the merits of the NPS, and to have regard to it would be directly in contradiction of NPS EN-1 (in particular the paragraphs cited above that make clear that the need is established and that there is no requirement to consider the contribution of individual projects). The determination of the Applicant's DCO Application is not the means by which

				to challenge the provisions of the NPS, and it is for this reason that the ExA and SoS are able to disregard this representation and any similar others, pursuant to sections 87, 94 and 106 of the Planning Act 2008 during the examination of the Application and when determining the Application. It is noted that Annex B of the Examining Authority's **Rule 6 letter [PD-006]** is clear that the merits of the designated NPSs are not a matter for discussion during the Examination, stating "*The SoS is entitled to disregard any representations that relate to the merits of the designated NPSs. In practice, this means that the ExA will not spend time examining representations that challenge policy set out in NPSs, or the validity of NPSs themselves. The focus will be on the merits or otherwise of the proposed development, tested to the appropriate extent using the tests set out in relevant designated NPSs that are in force".*

WC-037	Climate Change and Energy Need	Climate Change Consideration	7.12. It is acknowledged that in relation to average carbon dioxide emission per kilowatt hour (carbon intensity) is lower than the average gCO2e/kWh from the grid and therefore the scheme will contribute to reducing the average emissions from the grid. However, the carbon intensity figures do not take into account the upstream and downstream emissions associated with the Scheme (i.e. the construction, maintenance and decommissioning phases) – as mentioned the lifetime emissions are significant. Again, the council considers that acknowledgement of these factors should be considered within decision-making and the ExA is asked to carefully consider these factors.	The Applicant disputes the claim that the carbon intensity figures do not take into account the upstream and downstream emissions associated with the Scheme. **ES Volume 1, Chapter 7: Climate Change [APP-059]** in Paragraph 7.10.74 provides the carbon intensity of the Scheme including upstream and downstream emissions associated with the Scheme from embodied carbon in products. This is inclusive of mineral extraction and processing emissions. As explained in Paragraph 7.10.75, the global operational emissions of the Scheme are assessed, e.g. emissions from global production of products and potential international shipping emissions. These have been used to compare the performance of the Scheme with the UK grid emissions, which considering only the national emissions of the current UK grid. This represents a highly conservative approach.
WC-038	Climate Change and Energy Need	Climate Change Consideration	7.13. Notwithstanding this, Table 7-11 of ES Vol 1, 6.1 Chapter 7 Climate Change [APP-059] shows that solar schemes have a relatively low carbon intensity compared to other technologies e.g. coal, natural gas and nuclear, albeit higher than wind and hydropower. It is considered that this is likely to be the case even with upstream and downstream emissions included.	The Applicant concurs that solar technology represents a lower carbon intensity than coal, natural gas and nuclear. Please refer to the above response to Comment 7.12 which confirms that the Applicant has appropriately assessed upstream and downstream emissions associated with the Scheme.

WC-039	Climate Change and Energy Need	Climate Change Consideration	7.14. In conclusion, from a climate perspective the proposal demonstrates that there will be significant and beneficial net GHG emissions savings over the lifetime of the project. Whilst it is acknowledged that on a national strategic level, the overall negative impacts of the energy development considered necessary to achieve net zero are considered to be outweighed by the positive benefits, Wiltshire Council's view is that it would be important to be able to justify that the long-term benefits of this specific project, at this scale and location, outweigh the short-term impacts both on Wiltshire's territorial carbon emissions and the UK Carbon Budgets (and the associated locked in global warming) as well as the wider environmental, economic and community impacts of the project.	The Applicant notes this comment and would refer to the Applicant's responses to paragraphs 7 to 7.13 in Wiltshire Council's Relevant Representation to inform the Climate Change assessment's conclusions in the wider context of Wiltshire's own Climate goals.
WC-040	Climate Change and Energy Need Description and DCO Process	Draft DCO and Control Document Considerations	Draft DCO and Control Document Considerations 7.15. Based on the above observations, it is imperative that the scheme, if permitted, does everything it can to minimise GHG emissions during the lifetime of the project, and in particular the construction phase. 7.16. It would be helpful to include a Requirement to ensure the GHG emissions mitigation measures listed are implemented and enforced, as a minimum. 7.17. The mitigation listed for GHG emissions at construction, operation and decommissioning phases must include measures to reduce emissions as much as the current technology	Measures to mitigate the emissions from the scheme are included in the **Outline CEMP [APP-277]**, **Outline OEMP [APP-278]** and **Outline Decommissioning Strategy [APP-279]** respectively. These management plans will be developed into detailed documents and secured via requirements as set out in the **draft DCO [APP-016]**. Best endeavours to utilise low emission plant will be in place. In relation to vehicles, the **Outline CEMP [APP-277]** contains mitigation and enhancement measures for operating vehicles, machinery and

			allows, and project planning must be flexible enough to allow for future innovations. 7.18. Specifically in relation to vehicles, to ensure that as well as staff travel, low carbon vehicles, equipment and tools are used in construction, maintenance and decommissioning and further carbon emissions reduction measures are included in detail in a Sustainable Construction Plan. Part of this should set out a sustainable procurement policy with requirements for all contractors in relation to carbon reduction, environmental, community and ethical considerations, to ensure the contractors minimise their impact and take opportunities to innovate through contract lifetime, in construction, maintenance and decommissioning phases. 7.19. In addition, circular economy solutions are also evolving, and a Requirement could be used to ensure that these are built into the construction, maintenance and decommissioning plan during the lifetime of the scheme.	sustainable travel. This includes the implementation of a Travel Plan that supports and encourages sustainable travel (public transport, cycling, walking, and car-sharing). This is secured by a Requirement within the **Draft DCO [APP-016]**. The **Outline CEMP [APP-277]** also requires the production of a Construction Traffic Management Plan. The **Outline CTMP [APP-287]** contains Travel Plan Measures including, amongst other commitments, encouraging the use of electric vehicles (EV) and the provision of information on the closest available EV charging points in the local area.

WC-041	Landscape and Visual	Policy Considerations	8. Landscape and Visual Considerations Policy Considerations 8.1. The 6.1 Environmental Statement Volume 1, Chapter 8 Landscape and Visual [APP-060] at Section 8.3 provides a resumé of the relevant landscape legislation and policy pertinent to the project, apart from Policy 86 Renewable Energy of the Wiltshire Local Plan Review 2020-2038, which is not included. 8.2. Policy 86 is a comprehensive policy which will ensure that there is a satisfactory resolution to all site-specific constraints and requires that the following relevant to landscape and visual matters are considered (along with other relevant policies in the Local Plan): *a. the need to balance the wider environment, social and economic benefits of renewable electricity, heat and / or fuel production / distribution / storage;* *b. the landscape, particularly in and around Area of Outstanding Natural Beauty and the setting of the New Forest National Park;* *d. the need to conserve and where possible enhance biodiversity including species and habitats;* *f. the cumulative environmental effects of proposals with other renewable energy installations;* *g. best and most versatile agricultural land;* *h. for ground mounted solar*	The Applicant notes the comments. Criteria a) of Policy 86 Renewable Energy of the Wiltshire Local Plan Review 2020-2038 relates to the planning balance. The Scheme must be decided in accordance with the relevant National Policy Statements (NPSs EN-1, EN-3 and EN-5), and local policy such as this may be an important and relevant consideration. It is for the Examining Authority to make a recommendation to the SoS, who will ultimately make the decision. Criteria b) relates specifically to the Cotswolds National Landscape. **ES Volume 1, Chapter 8 Landscape and Visual Impact Assessment (LVIA) [APP-060]** includes **Appendix 8-6 Effects on the Cotswolds National Landscape and its Special Qualities [APP-197]**, which considers the landscape and visual effects of the Scheme on the Cotswolds National Landscape (CNL) and its special qualities. In relation to visual amenity within Criteria k), the **LVIA [APP-060]** assesses effects on the visual amenity of residents in detail and acknowledges that there would be an immediate change to views from some residential properties as a result of the solar infrastructure resulting in Significant adverse effects visual amenity. NPS EN-1 recognises at para 5.10.5 that impacts and effects are likely to be

			development, that grazing practices are maintained, particularly within defined SAC bat sustenance zones; *i. the proper functioning of the local highway network, recognising the value and function of the designated rights of way network;* *k. the amenity of local residents, including noise, odour, visual amenity and safety.* 8.3. As yet, it is difficult to ascertain from the ES submission that the above criteria have been given due consideration. In particular, the LPA would draw attention to criteria a., b., and k., where the balance between the potential effects on the wider receiving environment (landscape) and the benefits of the scheme; the setting of the Cotswolds National Landscape and; the amenity of local residents, whilst being acknowledged, do not appear to have been given due regard in the selection of the proposed development sites and the scale of the project as a whole.	experienced with large scale ground mounted solar developments. The Scheme is not permanent. The application is for a period of up to 60 years operational life. At which point, the development would be required to be decommissioned. At decommissioning, agricultural fields would be returned back to the landowner. As infrastructure is removed, there would be an overall benefit to the character of the area with landscape proposals retained providing long term benefit towards legacy landscape. Following decommissioning, the Site would benefit from the significantly enhanced tree and hedgerow planting that has been carried out and has matured to create a much stronger and robust landscape, retaining, and enhancing the overall character and providing considerable biodiversity benefits over the years. Due to the development, the landscape would be left in a better condition than current day. This betterment is established as a consequence of the landscape proposals resulting in greater species variety, greater age depth, enhanced structure, resilience to pest and disease and reinforcement of local landscape character across the Sites. The proposals have been developed in line with Wiltshire's Nature Recovery Strategy and the defining legacy of the landscape would be the robust

				framework of features that have improved through the mitigation and landscape enhancements embedded within the Scheme. This mitigation in turn would give rise to long-term wider benefits, including maintaining and enhancing biodiversity and in promoting the resilience of ecosystems. Noting that Policy 86 is a comprehensive Policy, it is considered that the proposed Scheme as assessed in the landscape and visual assessment has given due consideration to the landscape and visual matters set out in the Policy.

WC-042	Landscape and Visual	Policy Considerations	8.4. Compliance with Wiltshire Core Strategy Policy CP51 'Landscape' is not possible as the project cannot fulfil the requirement to: 'protect, conserve and where possible enhance landscape character and that new development must not have a harmful impact upon landscape character'. The Project will have a harmful impact on landscape character due to its contrasting nature with the existing baseline situation and scale of land use change proposed. However, the scale of this harm over 749.30ha plus the CRC corridor, is clearly a major 18 issue over a protracted, intergenerational project lasting for 60 years. Landscape mitigation and enhancement proposals are provided, but whether these are actually suitable to be sympathetic to the baseline character of the receiving landscape is debatable. This is because the existing low hedgerows currently allow longer views over and appreciation of the wider landscape, which would be impacted by the visual mitigation strategy, which proposes to allow most hedgerows to grow taller to deliver the required screening. While planting lines of trees offset from hedgerows, i.e. along the Fosse Way north-west of Fosse Lodge, or planting double width hedgerows to improve screening are not identified to be characteristic of landscape baseline features.	**ES Volume 1, Chapter 8 Landscape and Visual Impact Assessment (LVIA) [APP-060]** identifies a significant adverse effect to the character of the landscape within the 1km Local Study Area of the Sites, during construction and operation Year 1. This relates to the change in land use and thus landscape character from the addition of solar infrastructure, before the mitigation planting has become established. The effect is reduced to not significant from Year 15 of operation. The Scheme is not permanent. The application is for a period of up to 60 years operational life. At which point, the development would be required to be decommissioned. With regard to mitigation, the proposed mitigation planting includes for substantial areas of new woodland, hedgerow and meadow planting, which once established would provide positive contributions to the countryside in line with the Wiltshire's Nature Recovery Strategy. It is agreed that the mitigation planting, particularly allowing hedgerows to become taller and maintained to a height of 4.5m would cause a change in landscape character and loss of longer views over the landscape in some places. However, it is noted that not all of Wiltshire's hedgerows are maintained to a low height and this change would not be significant or permanent as hedgerows

				could be clipped low again following decommissioning. The defining legacy of the landscape would be the robust framework of features that have improved through the mitigation and landscape enhancements. This mitigation in turn would give rise to long-term wider benefits, including maintaining and enhancing biodiversity and in promoting the resilience of ecosystems. NPS EN-1 recognises at para 5.10.5 that "*Virtually all nationally significant energy infrastructure projects will have adverse effects on the landscape, but there may also be beneficial landscape character impacts arising from mitigation*." Annex B of the **Planning Statement [APP-267]** provides an assessment of the Scheme against Core Policy CP51 'Landscape' (page 687 of the Planning Statement).

WC-043	Landscape and Visual	Policy Considerations	8.5. Policy 91 'Conserving and enhancing Wiltshire's landscapes', is a key policy covering rural development in the Wiltshire Local Plan Review, with a current adoption date of the second quarter of 2026, which is likely to be within the decision-making period for this proposal. Of particular relevance to this project are the following sections: *"Development will conserve and where possible enhance Wiltshire's landscapes by:* *1) being located and designed to respect landscape character and maintain an area's distinctive sense of place and reinforce local distinctiveness as set out in the Wiltshire Landscape Character Assessment and landscape strategy;* *2) conserving, enhancing, and restoring the characteristics and views of landscapes along with valued attributes and existing site features such as trees, hedgerows, dry stone walls and waterbodies that contribute to the character and quality of the area;* *3) conserving and enhancing the locally distinctive character of settlements and their landscape settings;* *Wiltshire's designated landscapes* *Great weight will be given to conserving and enhancing the landscape and scenic beauty of Wiltshire's designated landscapes, Areas of Outstanding Natural Beauty and the New Forest National Park. Development within, and influencing the setting of, these designated areas should be limited in scale and extent and are expected to contribute towards conserving and*	The Scheme has been landscape led and reflects the requirements of Policy 91. This process has been informed by feedback received through various consultation activities, including engagement with stakeholders, statutory consultees, host authorities, local communities, and residents. The **Design Approach Document [APP-268]** demonstrates how the fundamental principles of good design have been embedded throughout the Scheme, which has been shaped by a series of design principles and parameters. These principles include for example a landscape-led approach, application of the mitigation hierarchy and delivery of biodiversity net gain. The design development of the Scheme recognises the need for careful siting, design and mitigation, and the importance of an iterative approach to design to ensure appropriate design solutions are reached. The Scheme has been designed to be sympathetic to local character and setting, helping to protect and enhance the landscape through the landscape- led design. The LVIA process is iterative and as a result, the design of the Scheme has changed to respond to the findings of the assessment to ensure that landscape mitigation is fully considered as part of the process within the environmental masterplan. This has involved setting out the key elements of constraint within parameter plans and

			enhancing their natural beauty. Proposals for development within or affecting designated landscapes must demonstrate that they have taken account of the objectives, policies and actions set out in the relevant management plans for these areas. Proposals for development outside of an Area."	adopting the mitigation hierarchy in accordance with GLVIA3. This has taken account of the context and features of the land within the Order limits, nearby sensitive receptors and assets, information emerging from environmental surveys, feedback from stakeholders, and opportunities and constraints in order to develop a good design that balances the need to maximise the energy generation capacity of the Scheme, with the avoidance and mitigation of impacts, and provision of environmental and other enhancements, where practicable. With regards to the Cotswolds National Landscape (CNL), the **ES Appendix 8-6 Assessment of Effects on the Cotswolds National Landscape and its Special Qualities [APP-197]** sets out specific avoidance measures to protect the CNL. This includes the avoidance of infrastructure to the boundary of the CNL as well as further removal of panels following Consultation, within the setting of the CNL in Sites A, B and C where there is a strong visual relationship between the CNL and the Scheme. This includes: • Site A: The northern part of fields A1, A11 and A12. • Site B: B12. • Site C: C1, C6, C8, part of C9 and the majority of C10. Panels in C2, C3 and C4, where significant visual effects on receptors within the CNL were recorded at PEIR

				were subsequently removed from the Scheme following Statutory Consultation with the CNL. Furthermore, the CNL Management Plan as well as its and Wiltshire's Nature Recovery Strategy have informed the approach to mitigation and positive enhancement. Annex B of the **Planning Statement [APP-267]** provides an assessment of the Scheme against emerging Policy CP91 'Conserving and Enhancing Wiltshire's Landscapes' (page 803 of the Planning Statement).

WC-044	Landscape and Visual	Policy Considerations	8.6. Policy 91 is relevant to all potential solar developments within the county, but in this case takes on particular relevance due to the very large scale of the proposed development within the setting of the Cotswolds National Landscape and within a landscape which in part is considered to be of High Value due to proximity to and shared intervisibility with the CNL and its complementary landscape character (Lime Down Sites A, B and C). There is little evidence within ES Chapter 8 [APP-060] that the value and sensitivity of the landscape, coupled with the effects of the dramatic change in land-use, function and perception of the landscape, have been given due attention in the application. For example, the settlement of Norton is proposed to have extensive solar development on two sides (north and south), but there appears to be very little attempt to reduce the potential effects on its landscape setting by restricting solar panels close to the settlement, therefore failing to comply with 3) above.	The value of the Landscape associated with the Scheme has been robustly assessed within **ES Volume 1, Chapter 8 Landscape and Visual [APP-060]** and **Appendix 8-3-2-2 Landscape and Visual Assessment Sheets [APP-191]**. A standalone Assessment on the CNL and its Special Qualities has been undertaken in **ES Appendix 8-6 Assessment of Effects on the Cotswolds National Landscape and its Special Qualities [APP-197].** The value of the CNL has been assessed as having a High Value, consistent with its designation. The vast majority of land within the Scheme is outside the CNL (aside from minor highway improvements within the CNL itself). However, the land is in close proximity to the CNL; has shared intervisibility, and Sites A, B and C are agreed to be within the setting of the CNL. The **LVIA [APP-060]** assessed land within its setting also to be High Value. This reflects the proximity to the CNL and its complementary landscape character. Although the character of the landscape is complimentary its condition is not. Land within and outside the CNL is distinctly different. There is a visible absence of stone walls within the landscape outside of the CNL, a defining special quality of the CNL which is clearly visible within the CNL. There is also a visual difference in the scale and pattern of fields and associated land use where smaller fields of pasture are

				characteristic within the CNL whilst larger arable fields define the landscape beyond the CNL. With reference to **Section 3 [APP-191]**, the value of Sites A, B and C within the setting of the CNL have been assessed as having a High Value at all levels of the Assessment (on Landscape Fabric, the 1km Local Study Area, the 2km Wider Study Area and the 5km Outer Study Area. However, on Sensitivity, which is a combined judgement of Value and Susceptibility the LVIA assessment of Susceptibility changes depending on the level of Assessment as follows: • On landscape fabric where the key features that make up the fabric of the landscape are retained, susceptibility to the development is assessed as Low leading to Medium Sensitivity to change. • On the 1km Local Study Area susceptibility to the development is assessed as Medium leading to High to Medium Sensitivity to change. • On the 2km Wider Study Area, susceptibility to the development is assessed as Medium leading to High to Medium Sensitivity to change. • On the 5km Outer Study Area as a higher proportion of the study area contains the CNL

				susceptibility to the development is assessed as High, leading to High Sensitivity to change. In relation to Policy 9, the settlement of Norton (visual receptor number RS008) has been assessed in **Appendix 8-3-2-1-1 [APP-190].** Mitigation measures are shown on the of LEMP **[APP-084]** and include buffers to the village and new hedgerows to the boundaries of infrastructure. Annex B of the **Planning Statement [APP-267]** provides an assessment of the Scheme against emerging Policy CP91 'Conserving and Enhancing Wiltshire's Landscapes' (page 803 of the Planning Statement).

WC-045	Landscape and Visual	Policy Considerations	8.7. Overall, the effects of the proposals on the character and visual amenity of the receiving landscape have been consistently under-estimated.	The LVIA as presented in **ES Volume, Chapter 8: Landscape and Visual [APP-060]** follows guidance in GLVIA and is robust. The LVIA identifies that there would be significant effects on the 1km Local Study Area as a result of the change in land use. However, due to the nature of the dispersed Sites and the character of the receiving landscape, with its rolling topography the effect of the Scheme on the Wider and Outer Study Area reduces to Non-significant.
WC-046	Landscape and Visual	Policy Considerations	Environmental Assessment Considerations General Comments on Accuracy of Information Included 8.8. An initial comment is that for the LVIA document to provide any confidence to local residents and those with a local interest in the project that it has been carefully prepared, is that place names, road and property names are spelt correctly. For example, the three different spellings of Malmesbury noted in ES Chapter 8 [APP-060] does not instil confidence that the consultants / applicant have taken care or developed a detailed knowledge of the area, or that that the document has been checked with sufficient time or care before its DCO submission.	The Applicant notes this comment.

WC-047	Landscape and Visual	Environmental Assessment Considerations	8.9. A further observation is that the LVIA and its supporting appendices cross reference various application documents. Some cross-references are incorrect, which both frustrates and complicates review of the submitted information. An example of this is contained within ES Vol 3, Appendix 8-3-2-2-1 - Landscape and Visual Assessment Sheets [APP-191], where two references are included at Page 19, paragraph 4 and both appear to be wrong i.e. *''Construction activities within the Scheme would be managed by the Outline Construction and Environmental Management Plan (CEMP) in ES Volume 1: Chapter 7.12 [EN010168/APP/7.12] and the Arboricultural Impact Assessment and Outline Method Statement in Volume 3: Appendix 10-4 [EN010168/APP/6.3] to ensure the protection of all existing landscape features to be retained during the Construction Phase.''* ES, Vol 1, Chapter 7.12 relates to the Climate Change ES topic subject matter, not the outline CEMP, which is ES, other documents [APP-277], while Appendix 10-4 [APP-209] relates to Relevant legislation, policy and guidance. It is Appendix 10-1 [APP-206] which is the reference that should be signposted.	The Applicant notes this comment.
WC-048	Landscape and Visual	LVIA Assessment Methodology	8.10. The LVIA assessment methodology is included as a separate appendix to the main report ES Vol 3, 6.3, Appendix 8-1: Landscape and Visual Impact Assessment	The Applicant notes this comments and welcomes confirmation on the compliance of the LVIA Methodology with GLVIA3.

			Methodology [APP-187]. The methodology is generally considered standard and compliant with best practice (GLVIA 3) for undertaking the LVIA process, however the resulting outputs are muddled, inaccurate, in places incomplete, and lack transparency.	
WC-049	Landscape and Visual	LVIA Assessment Methodology	8.11. The terminology used within the assessment is outlined at Section 1.2 of the LVIA methodology [APP-187]. At paragraph 1.2.1 a description of the definitions, scope and context of the terminology used in the LVIA process includes a reference to the LVIA Glossary used in the assessment. The LVIA Glossary is included at Page 46 to 49 of this appendix 8-1. The definition of 'Landscape Fabric' at Page 48, 3rd row of this glossary is a concern. While the term 'Landscape fabric' is not formally defined in the GLVIA3 (2013) or its 2024 Technical Guidance Note (LITGN/2024/01) it is being increasingly used in practice by landscape professionals to describe the tangible elements and components of the landscape that comprise the landscape baseline and that may be impacted by a development proposal. This is not in itself highlighted to be a concern, although the definition of 'Landscape Fabric' should be clearly denoted with an * within this glossary (indicating it is in fact a departure from published GLVIA3 terminology). 8.12. The issue of concern relates to the limited examples included in the definition of 'Landscape Fabric' within	A technical note to clarify how landscape fabric and landscape character is considered within the assessment will be provided at Deadline 1 and will be provided directly to Wiltshire Council.

			this assessment's 'LVIA Glossary' which does not include any representative 'built elements' or 'perceptual or aesthetic' qualities. It only includes the more natural elements such as landform, woodland, hedges, tree cover and vegetation.	
WC-050	Landscape and Visual	LVIA Assessment Methodology	8.13. The definition of the term Landscape fabric needs to encompass all the physical and spatial components that combine and interact with each other. These include natural, cultural and historic features, land-use and current management practices, built elements such as infrastructure and roads, settlement pattern, including perceptual and aesthetic aspects such as relative tranquillity and sense of openness / enclosure and ruralness, all of which collectively define the baseline landscape fabric and combine and interact to form the characteristics of the site and the receiving landscape context. At present, the limited nature of landscape fabric components that the Applicant has considered within their assessment (both existing and introduced), is contributing to assessment scores which are not considered to give a true reflection of change to the baseline landscape fabric components, which in turn, collectively	A technical note to clarify how landscape fabric and landscape character has been considered within the assessment will be provided at Deadline 1 and will be provided directly to Wiltshire Council.

			comprise to give overall baseline landscape character.	
WC-051	Landscape and Visual	LVIA Assessment Methodology	8.14. The various introduced new built elements / components such as substations, internal access tracks, solar PV arrays, alongside changes to current land use and management, alterations to the rural road network, new planting and changes to vegetation management are all components that together influence the baseline landscape fabric, including its perceptual and aesthetic qualities. 8.15. The council believes this contributes to the obvious short comings of the assessment of 'Landscape Fabric' included within the LVIA (this is discussed further under Landscape Fabric).	**ES Volume 1, Chapter 8 Landscape and Visual [APP-060]** has fully assessed the Scheme which includes: new built elements / components such as substations, internal access tracks, solar PV arrays, alongside changes to current land use and management, alterations to the rural road network, new planting and changes to vegetation management are all components that together influence the baseline landscape fabric, including its perceptual and aesthetic qualities within the three Study Areas. The assessment of Landscape Fabric looks at how this is changing at the site level in order to better understand what the differences would be from the Scheme on the character of the wider landscape as assessed within the three study areas. A technical note to clarify how landscape fabric and landscape character is considered within the assessment will be provided at Deadline 1 and will be provided directly to Wiltshire Council.

WC-052	Landscape and Visual	ZTV and ZoI	8.16. The ZTV is an important component in the process that initially informs the extent of the Zone of Influence and thus the Study Area. This is typically checked on site and refined or confirmed following subsequent visits to the site and surrounding area. This was initially undertaken as a bare-earth assessment, which is of limited value as the whole essence of the Landscape and Visual study is to gain a detailed knowledge of the landcover, landform, built form and their interactions. Therefore, the Augmented ZTV is a far more useful tool than the original bare earth assessment. 8.17. It is not clear what the height of the structures used to establish the ZTV is and from where the surface model has taken the points of visibility for each of the site's A-E. This includes: type and height of solar panels, substations, BESS, and other ancillary structures. It is not clear whether the substations have been assessed separately or ignored, being potentially the tallest structures on the sites. The ZTVs of the tallest structures should be assessed separately. 8.18. It is also not clear whether the calculated ZTVs for each of the component sites A-E have been over-laid to produce an accurate ZTV for the whole project in order to be enabled to determine the locations of the primary intra-project Combined Cumulative Visual Effects (and, in combination with Landscape Character Type (LCT) and	It is agreed that the Augmented ZTVs are a far more useful tool than the bare earth assessment. Numerous Site visits have been undertaken to establish the baseline character and condition of the landscape within and surrounding the five Sites as well as assessing the potential visibility of the Sites using the Augmented ZTVs. It should be recognised that ZTVs are only a tool to support on ground assessment and are not definitive. The extensive field work identified locations where there are intra-project Combined Visual Effects. The ZTV Methodology is set out in Section 4 of **ES Volume 3, Appendix 8-1 Landscape and Visual Impact Assessment Methodology [APP-187]**, the Bare Earth ZTVs are shown on **ES Volume 2, Figure 8-8 to 8-8-13 Bare Earth Zone of Theoretical Visibility (ZTV) [APP-097]** and the Augmented ZTVs are shown on **ES Volume 2, Figure 8-9 to 8-9-13 Augmented ZTV [APP-098].** Each drawing in both Figure series provide the following text: "*This ZTV was produced to indicate theoretical visibility as a worst case, with an assumption that the proposed development would fill the full extent of the development area at a maximum panel height of 4.5m, a BESS height of 4.5m, a 400kV substation height of 13m and 132kV substation height of 7m, with an observer height of 1.7m*".

			Landscape Character Area (LCA) information, the Cumulative Landscape Effects). 8.19. It is therefore considered that the efficacy of the ZTV does not provide the required quality for the major and complex project to which it is being applied.	Each Figure series include: • ZTV for the Full Scheme at each individual Site A-E and the Cable Route Corridor (Bare Earth Figures 8.8.1- 8.8.8 and Augmented Figures 8.9.1-8.9.8) • ZTV for each Site only at each individual Site A-E (Bare Earth Figures 8.8.9-8.8.13 and Augmented Figures 8.9.9-8.9.13) It is considered that the ZTVs for the Full scheme demonstrate the potential visibility of Combined Cumulative Visual Effects.
WC-053	Landscape and Visual Cumulative Impacts	Cumulative Impacts	Cumulative Impacts 8.20. This response refers to the likely cumulative landscape and visual impacts of the project and forms a key part of the EIA process. For a project of the scale and disparate nature proposed, it is necessary to undertake an intra-project Cumulative Impact Assessment of the potential landscape and visual interactions between the sites A-E and their potential effects on the receiving landscape and visual amenity. 8.21. An assessment of the cumulative landscape effects of Sites A-E is required. This will involve a comprehensive assessment of the effects of the proposals on landscape	The LVIA includes an assessment of the cumulative effects of the five Solar Sites making up the Scheme (intra-project cumulative effects) to ensure the effects of the Scheme as a whole are understood. It also assesses the cumulative effects of the Scheme in combination with other similar developments in the area. The full detailed LVIA methodology is set out in **ES Volume 3, Appendix 8-1 Landscape and Visual Impact Assessment Methodology [APP-187]** and **ES Volume 1, Chapter 6 Environmental Impact Assessment Methodology [APP-058].** The cumulative landscape effects of the Scheme are set out in **ES Volume 3, Appendix 8-3-2-2 Landscape and**

			fabric, including land use and embedded mitigation. These cannot merely be assessed by combining the results from each individual site. They must be assessed together. 8.22. An assessment of cumulative visual effects of Sites A-E must be undertaken in two parts. Firstly, a combined or in combination assessment is required, which will be undertaken to cover a) where more than one site is visible in a viewing arc; b) where the receptor turns and is able to see another, or several other sites, in 360 degrees but without moving for the viewpoint location. Combined intra-project viewpoints can be simply ascertained by utilising a detailed ZTV methodology, suitable for the project scale, as detailed above in ZTV and ZoI.	**Visual Assessment Sheets (Significant) [APP-191]** and summarised in Table 1. In relation to point 8.22, cumulative visual effects have been assessed. For each visual receptor assessed the visibility of the Scheme was identified firstly to the Site in closest proximity and secondly to the visibility of any other site. There are very few receptors where cumulative visibility was identified. Receptor TP097 Bridleway WT|SHER|16 is an example where cumulative visibility was identified. The initial assessment noted: "*The Bridleway passes through the centre of Site A and there is direct visibility to A2, A3, A7, A8, A9 and A10. There are also longer distance views towards Lime Down Site C from the southern end of the Bridleway near Lordswood Farm beyond intervening vegetation*". The effects of Site A are assessed first which identified Major/ Moderate Adverse effects. In considering the effects of the additional visibility of Site C which is visible in longer distance views beyond intervening vegetation from the eastern end of the Bridleway, the assessment concluded "*This would not increase the effects above those described above*" for Site A (refer to p236, **Appendix 8-3-2-2-3 [APP-191].** The above example represents sequential visibility. There are other examples within the LVIA where other types of cumulative visual effects are identified including a) where more than

				one site is visible in a viewing arc; b) where the receptor turns and is able to see another, or several other sites, in 360 degrees but without moving for the viewpoint location. Refer to **Visual Assessment Sheets [APP-189]** and **[APP-191]**
WC-054	Landscape and Visual Cumulativeand In-Combination Effects	Cumulative Impacts	8.23. Secondly, a sequential assessment must be undertaken. Sequential visual effects occur when an observer moves along what would be considered to be a well-travelled route. In this case the Fosse Way, which is a very popular recreational route is considered to be a key route where sequential effects should be assessed, but there are also PRoW and minor road links, particularly routes between settlements and circular routes close to settlements which will require assessment. A selection of potential Sequential Visual Effect routes is given at Table 8-23 of ES Chapter 8 [APP-060]. However, these have not been adequately assessed for potential effects and a full description of the effects as the receptor passes though the landscape is required. The ES focusses, erroneously, on Major Roads	As shown by the example of Receptor TP097 above, sequential visual effects on individual receptors have been addressed in the visual assessment. Table 8-23 of **ES Volume 1, Chapter 8 Landscape and Visual [APP-060]** identifies the following publicised routes where there are sequential visual effects: • The Macmillan Way • The White Walls Way (Stage 3) • Sherston Walk 2 • The Fosse Way As the routes are made up of lots of individual sections of various footpaths, bridleways, roads etc., Table 8-33 also identifies the PRoW and Public Highway Receptors which have been fully assessed in the Visual Assessment. Sequential Effects for

			for determining sequential effects from roads. At ES para 8.10.46 it is stated that GVLIA3 refers to major roads. It does, but only as an example. It also states in GLVIA3 Table 7.1 that: "*Sequential effects may be assessed for travel along regularly used routes*….". Given the receiving landscape contains very few roads which would be classified as more than minor, it is obvious that these routes are those which are going to be used for travel within the area and therefore the sequential effects of travelling along them must be assessed.	users of these Recreational Routes are not considered to be any greater than those effects identified for the individual sections as set out within **ES Volume 3, Appendix 8.3 series [APP189-199]**. Whilst it is recognised that there would be an appreciation of an overall increase in solar infrastructure as users of these routes move through the landscape, due to the discrete areas of land within the Scheme and the rolling topography of the landscape, the Scheme would not be perceived in its entirety and the solar panels are distributed 'in and amongst' the landscape features helping to assimilate them into the landscape.
WC-055	Landscape and Visual Cumulative and In-Combination Effects	Cumulative Impacts	8.24. It is noted that due to the disaggregated / disparate nature of the Lime Down Sites A to E, the Applicant has structured their assessment to include a combined or intra-project assessment of individual DCO sites combined. The council considers that it is not appropriate to simply conclude that because no individual site on its own generates significant effects above a certain threshold, then the combined resulting impact for these sites assessed together could therefore not be greater than for the assessment of the individual site areas. Intra-project cumulative effects should be treated separately from the site-specific Landscape and Visual Impacts.	The Assessment of the Scheme Intra-project effects is set out in detail in Section 2 of **ES Volume 3, Appendix 8-3-2-2 Landscape and Visual Assessment Sheets (Significant) [APP-191].** In this section, details of the combined Scheme effects rather than the individual Site effects are assessed. The project has evolved as part of the iterative design process and higher levels of effects were recorded in Site C initially. This resulted in avoidance measures being taken to reduce the level effects. It is due to the "disaggregated / disparate nature of the Lime Down Sites A to E" that the assessment does not consider there to be a greater effect than for the assessment of the individual sites.

WC-056	Landscape and Visual Cumulativeand In-Combination Effects	Cumulative Impacts	8.25. Cumulative effects with other similar (Solar / BESS) projects at up to 10km from the site, including the CRC, should be assessed as described above. However, in terms of cumulative landscape effects, the combined or in combination effects are unlikely to be determined through ZTVs. Therefore, it shouldn't be assumed that there will be no effects with projects outside the project ZTV. Other potential combined effects can be determined by further desk top study, site visits and photography. 8.26. Sequential visual effects need to be treated as described above. It is of concern to the LPA that the effects on users of the Fosse Way have not been fully addressed. The sequential assessment should include the Newton Dairy, Long Newton Airfield and Upper Marsh Farm installations, north of Malmesbury before proceeding to Lime Down Sites B and C. Further potential sequential effects should be assessed along the A429 / A350 route from west of Charlton Park (north of Malmesbury); passing Rodbourne Rail solar farm; south to Lime Down Sites D & E; then land at Red Barn NE of Kington St Michael. It does not appear that these sequential assessments have been undertaken as part of the ES.	The Study Area was extended to 10km for the Cumulative Assessment. The Cumulative Assessment of the Scheme (which includes the CRC) is set out in Section 4 of **ES Volume 3, Appendix 8-3-2-2 Landscape and Visual Assessment Sheets (Significant) [APP-191].** It is agreed that sequential cumulative visual effects on the Fosse Way and the A429 / A350 have not been extended to the 10Km Cumulative Study Area. However, the visual effects of users of the Fosse Way and the A429 have been assessed within the LVIA and there is no further intervisibility with any of the identified Cumulative Sites. The A3540 is more associated with the Cable Route Corridor and was not considered a visual receptor. Although a small section of the route, near Chippenham, is just within the Cable Route Study Area there is no intervisibility with the Cable route or Lime Down Sites A-E. It is noted that some existing and Cumulative Sites are visible from these routes as well as the Scheme. However, an assessment of the sequential effects of these routes is unlikely to identify any greater effects than from the Scheme alone due to the distance between the Sites across over 20km.

WC-057	Landscape and Visual	Landscape Fabric	8.27. Landscape Fabric was given limited consideration within the PEIR document at statutory consultation stage. ES Volume 3 Appendix 8-3-2-2-1 [APP-191], Section 2.1 deals with Landscape Fabric, but unfortunately the key features, components and their interactions, which are essential to include as part of a proper analysis of the receiving landscape, have only been given limited consideration. This does not give confidence that the individual sites have been assessed properly. 8.28. Taking Site C as an example: it covers 241ha and has four short sentences devoted to its key features. This is a very large development, with many differing features, components and interactions. This should be fully detailed as part of the assessment process. Interestingly, apart from stating that the site is in agricultural use, land-use does not feature in the assessment. When it comes to the Susceptibility to the proposed changes, the assessment has concluded that Landscape Fabric has a Low Susceptibility to change. This seems to be predicated on the fact that if land use change from agriculture to solar (industrial) is ignored, all the peripheral features can remain intact and thus there is "*a high ability to accommodate the specific proposed change, with little, or no, undue consequences for the maintenance of the baseline situation*". This is entirely incorrect and is not accepted by the LPA as an acceptable	Further clarification on the terminology used in the LVIA and the definition of the term Landscape Fabric will be provided in a technical note at Deadline 1 and will be provided directly to Wiltshire Council.

			way in which to assess Susceptibility of Change in the LVIA. Land use cannot be scoped out if it gives the wrong result in the assessment. 8.29. Paragraph 8.3.52 of ES Chapter 8 [APP-060] quotes the Wiltshire Council Renewable Energy Study Landscape Sensitivity Assessment 2023 as stating: "*Landscape sensitivity to these very large schemes would be categorised as "high" sensitivity regardless of location, requiring developers to pay particular attention to this issue in their specific applications*". Therefore, as the site has an accepted 'High' Receptor Value and a 'High' Sensitivity, its Susceptibility to the change proposed can only be 'High'. The matrix does not allow for downgrading this by ignoring key components of the Landscape Fabric. 8.30. Therefore, in respect of Site C, as an example, the assessment of effect on Landscape Fabric has been downplayed to an extent where the suitability of the Landscape Assessment must be called into question. At no point does the assessment acknowledge adverse effects and indeed suggests that after 15 years the effects will be beneficial. This is incorrect and is based on a flawed assessment (see Embedded Mitigation below). The Magnitude of Change and the Significance of Effect have been grossly underestimated. The proposals for Site C are looking at a land use change of a tranquil, rural landscape of 241ha (inclusive of	

			mitigation and landscape / ecological enhancement areas) to an extent which dwarfs the scale of the receiving landscape and any other development in the area. 8.31. Consequently, the LPA considers that the Landscape Assessment cannot be relied on to give an accurate and impartial assessment of impact.	

WC-058	Landscape and Visual	Embedded Mitigation	Embedded Mitigation 8.32. Embedded Mitigation is the primary mitigation which forms part of the design process of the project and is considered best practice on large, sensitive and EIA projects. The aim is to integrate environmental considerations into the project design to seek to mitigate negative and harmful effects, as well as to provide enhancements. In this project, this has resulted in the removal of panels from some fields and layout changes. Buffer strips in the form of hedgerows and woodlands have been introduced throughout, which are welcomed. Other buffers have been applied around ecological, residential and boundaries. 8.33. Landscape Design Parameters form a key part of the of the Embedded Mitigation. These parameters are based on the baseline landscape and visual considerations including the relevant landscape character assessments and, crucially, the existing landscape fabric and their interactions. Therefore, before taking the mitigation proposals forward, it is essential that there is a detailed description for each of the individual sites and their component fields. As discussed above, the landscape fabric has not been adequately covered in ES Chapter 8 [APP-060]. The LVIA findings in this regard should not be regarded as an acceptable basis to inform the decision maker. 8.34. The DCO process approval would effectively give the green light for the development, although much of the detailed design work and exact	The Applicant notes comment 8.32. With reference to comments in 8.33, as noted above, full Site Assessments are found in Section 3 of **ES Volume 3, Appendix 8-3-2-2 Landscape and Visual Assessment Sheets (Significant) [APP-191]** with Tables 6-10 providing the assessment for Sites A-E respectively. The Key Features of the individual Site are described, as well as its Site character in relation to the relevant Landscape Character Assessments. This, as well as extensive site work has provided a full understanding of the Solar Sites and its receiving landscape and visual character which has informed the approach to mitigation. The design of the Scheme has undergone an iterative development process involving collaboration between the Applicant, design team, and the environmental consultant team. This process has been informed by feedback received through various consultation activities, including engagement with stakeholders, statutory consultees, host authorities, local communities, and residents. Further clarification on the terminology used in the LVIA and the definition of the term Landscape Fabric will be provided in a technical note. The **Design Approach Document [APP-268]** demonstrates how the fundamental principles of good design

			locations of the components of the development are still to be finalised. This means that, although the Embedded Mitigation proposals are a key part of the project, they may have to be changed as the design progresses. Additionally, because the baseline landscape fabric has not been adequately considered, there is a very real danger that landscape planting and 'enhancement' measures could end up adversely changing the baseline condition. 8.35. All embedded landscape mitigation and enhancement measures should have their basis in the current baseline condition of the receiving landscape. Planting for mitigation, which does not relate to the existing landscape structure, could result in detrimental effects on the receiving landscape at decommissioning. 8.36. References to embedded mitigation measures as currently presented to achieve the stated assessed residual effects are not clear. It should be clear within the assessments what is being relied upon as mitigation, and what is a genuine landscape or visual enhancement over and above that essentially required and proposed to mitigate or compensate for adverse landscape or visual effects.	have been embedded throughout the Scheme, which has been shaped by a series of design principles and parameters. These principles include for example a landscape-led approach, application of the mitigation hierarchy and delivery of biodiversity net gain. The design development of the Scheme recognises the need for careful siting, design and mitigation, and the importance of an iterative approach to design to ensure appropriate design solutions are reached. The Scheme has been designed to be sympathetic to local character and setting having been informed by the Landscape Character Assessment Guidelines set out in **ES Volume 3, Appendix 8-4 Landscape Character Area Descriptions [APP-195]** and Wiltshire's Nature Recovery Strategy to protect and enhance the landscape through the landscape- led design. Re 8.36, the Applicant notes this comment. Measures for the implementation (including species and sizes), management, monitoring and replacement of landscape and ecological mitigation are set out in the **Outline Landscape and Ecological Management Plan [APP-283].** The detailed LEMP will need to substantially in accordance with the **OLEMP [APP-283]** secured through Requirement 7 in Schedule 2 of the **Draft Development Consent Order [APP-016]** NPS EN-1 recognises at para 5.10.5

				there may also be beneficial landscape character impacts arising from mitigation.”
WC-059	Landscape and Visual	Embedded Mitigation	8.37. There is also concern that some essential mitigation measures necessary to mitigate ecological harm are also being presented and possibly double counted as landscape enhancement, but without also acknowledging the harm it seeks to mitigate or compensate for, potentially skewing assessment scores. This is viewed to be relevant to consideration of positive environmental enhancement within the overall consideration of planning balance.	As the design of development has followed a landscape led approach, where cross disciplinary constraints and opportunities have been considered from the outset, it is entirely appropriate for some design features to be relied on as both ecological and landscape enhancement as well as mitigation. NPS EN-1 further supports this by recognising at para 5.10.5 “…*there may also be beneficial landscape character impacts arising from mitigation*.”

WC-060	Landscape and Visual	Visual Considerations	8.38. The photo viewpoints to be assessed were agreed with the LPA and CNL. Despite its very large size in a generally small-scale and intimate landscape, much of the proposed development is relatively well-contained visually from the wider landscape. 8.39. The photography undertaken is good. However, the interpretation of the results and the presentation of relevant information is poor and is difficult to interpret. The following issues are highlighted, and which need to be addressed: • The viewpoint locations do not follow a logical sequence and should have been grouped for each of the component Sites A-E and then extended to cover the intra-project cumulative viewpoints. • Viewpoint 57 is not mentioned in ES Chapter 8 [APP-060]. • The notation on the viewpoint photographs is very sparse and includes nothing more than a rough indication of potential visibility of the site. For the orientation of the reader and to enable a proper assessment of visual effects to be undertaken, the following information is required and would normally be provided: PRoW and road locations and any the relevant information and key features (e.g. Landscape features, prominent built form, woodland, etc.). • The viewpoints must be fully cross-referenced with ES Volume 3 Appendices 8-3-2-2 [APP-191] and 8.3.3 [APP-192] and the tables 8.20	Comment 8.38 and recommendations for additional clarification in **ES Volume 2, Figure 8-14 Baseline Photography and Photomontages [APP103- 105]** and **ES Volume 2, Figure 8-14 Baseline Photography and Photomontages - Viewpoint45- CNL G (Part 3) (Revision 2) [APP-AS001]** in 8.39 is noted by the Applicant. The viewpoint locations on the photosheets are broadly grouped per Site except for the additional viewpoints requested by Wiltshire Council and the CNL Board which are added to the end of the sequence (viewpoints WC1-3 and CNL A- G). The sequencing of the photography is unchanged since the scoping and PEIR submissions and no comments were made at these stages. Photography for viewpoint 57 is shown in **APP-AS001** as amended and is representative of views from WT|MALW|52 (Receptor No TP165). This receptor is fully assessed in **ES Volume 3, Appendix 8-3-2-2 Landscape and Visual Assessment Sheets [APP-191]**. In the assessment reference is made to the Photography for VP 57. In the LVIA, presented in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060].** Viewpoint 57 is listed in Table 8.9 on page 113 and the Moderate/Adverse effects on Receptor No TP165 are listed within Table 8-20: Significant Visual Effects: Public Receptors on page 144.

			and 8.22 in Chapter 8 of the ES text [APP-060]. The viewpoint locations and photography should assist the reviewer's and decision maker's understanding of the visual context and help transparently illustrate the visual assessment undertaken and the conclusions it reaches. There is concern that a number of apparent viewpoints where there are significant adverse impacts have not been referenced in 8.3.3 [APP-192]. If these public receptors have not been assessed in the proper manner, with a photographic record, this work should be undertaken and included in the ES document at this stage.	The notation on the viewpoints remains unchanged since the scoping and PEIR submissions and no comments were made at these stages. The representative viewpoints support the assessment of visual effects and have been appropriately referenced in the assessment of the visual receptors where applicable in **ES Volume 3, Appendix 8-3-2-2 [APP-191]** and **Appendix 8-3-3 [APP-192]** as noted in the above response to VP57. Tables 8.20, 8.21 and 8.22 in Chapter 8 of the ES text in **ES Volume1, Chapter 8: Landscape and Visual [APP-060]** in the LVIA provides a summary of the Significant Visual Effects in accordance with EIA procedure. Cross referencing to the supporting viewpoints within these tables is not considered to be appropriate as it is a summary of effects on Receptors and not viewpoints. In accordance with GLVIA3 (paragraph 6.19) '*representative viewpoints, have been selected to represent the experience of different types of visual receptor, where larger numbers of viewpoints cannot all be included individually and where the significant effects are unlikely to differ – for example, certain points may be chosen to represent the views of users of particular public footpaths and bridleways'*. It is considered that the submitted photography is representative of the

				visibility of the Scheme and the photography provided from the agreed viewpoints is suitable to assist the reviewer's and decision maker's understanding of the both the landscape and visual context and effects of the Scheme.

WC-061	Landscape and Visual Transport and Access	Assessments	8.40. The assessments of landscape and visual effects have been assessed during the construction, operation, maintenance and decommissioning of the scheme. They have been applied to Sites A-E and to the CRC route. 8.41. The construction phase is anticipated to last about two years, during which time there will be a requirement for the importation of very large amounts of material onto the sites (including aggregates for new track construction), often along roads which are single track. Whilst traffic may be considered a secondary effect, HGV construction movements, road signage and traffic safety control measures alongside enabling 'highway improvement areas' for access will have potentially high landscape and visual effects, albeit over a period of 24 months and to a lesser extent during the staged replacement of over a million solar panels, and 100's of battery units 2 or even 3 times during the operational lifespan of the project (as the panels and batteries reach the end of their anticipated design life). 8.42. Within the sites there will be a requirement for works compounds including: material storage and work areas, fuel storage, staff facilities, parking areas and possibly living accommodation. These sites will be extensive and have only been identified as Indicative Temporary Construction Compounds yet and have not been assessed. 8.43. Therefore, until full access and construction details are supplied, it is	With reference to paragraph 8.40, the assessments of landscape and visual effects also include an assessment of the Scheme as a whole. This is set out in Section 2 of **ES Volume 3, Appendix 8-3-2-2 Landscape and Visual Assessment Sheets (Significant) [APP191].** Paragraphs 8.41, 8.42 and 8.43 are noted by the Applicant. With reference to paragraph 8.44, Table 8-17 of **ES Volume 1, Chapter 8 Landscape and Visual [APP-060],** it is noted that the comments above do not note that Moderate Adverse effects within the 1 km Study Area were recorded. As explained above Landscape Fabric relates to the individual tangible elements or features of the landscape, such as landform, woodland, hedges, tree cover and vegetation for example, which can be described and quantified. These physical elements and features within each of the solar Sites are predominantly retained with very low levels of hedgerow removal relating to access tracks where existing gaps cannot be utilised. The change in land use is from arable farmland and is considered within the assessment of effects on Landscape Character. Further clarification on the terminology used in the LVIA and the definition of the term Landscape Fabric will be provided in a technical note. In the assessment of effects for the

			considered that, at best, the construction landscape and visual effects providing little more than an indication of the likely effects and cannot be relied upon to provide an assessment of the worst-case scenario. 8.44. The construction phase is deemed to have a Moderate / Minor Neutral effect on Landscape Fabric [APP-060] ES Vol 1, Chapter 8, Table 8-17 Significant Landscape Effects. It is considered that this is likely to be a gross under-estimate as it clearly has not included the changes mentioned above or the land use change. Thus, the consideration that Operation Year 1 will also be Moderate / Minor Neutral, appears to also be predicated on the erroneous assumption in the ES that 749,3ha of solar panels plus infrastructure plus mitigation / enhancement is not a change to the landscape fabric which needs to be assessed.	1km Local Study Area in Table 2.2 of **ES Volume 3: Appendix 8-3-2-2 [APP-191]** it is noted that "*Construction activities would have an impact locally, and the change in land use from arable farmland to a solar scheme would cause a noticeable change to the character of the 1km Local Study Area. There would be short term Moderate Adverse effects during the construction phase*". With reference to paragraph 8.43, full details of how the EIA has been undertaken adopting the principles of Rochdale Envelope and the Design Parameters (Table 3-1) used for the Environmental Statement are set out in **ES Volume 1, Chapter 3: The Scheme [APP-055].** The maximum and minimum parameters of the Scheme are set out in the parameters set out in **Design Principles and Parameters [APP-269]**, which are secured by Requirement 5 in the draft **Development Consent Order [APP-016]**. The LVIA has undertaken a worst-case scenario assessment based on these Design Parameters and so can be relied upon.

WC-062	Landscape and Visual	Assessments	8.45. By Operation Year 15, the ES assessed effect on Landscape Fabric is Moderate Beneficial (Significant). This is clearly a gross underestimation of the landscape effects of the project on the receiving landscape and the landscape fabric receptors. The proposed mitigation will only have a limited effect on landscape fabric receptors such that the key impacts of the proposed development on landscape fabric will remain undiminished for the operational life of development. 8.46. The effects of decommissioning are anticipated to be similar to those of the construction phase, although the mitigating planting will probably remain in place. The actual removal of the components of the scheme will likely involve landscape effects which will be adverse and will certainly not be 'Moderate, Beneficial (Significant)' as assessed in the ES. Post decommissioning, so long as the built infrastructure is totally removed leaving the legacy landscape, which should be the current baseline for the development (red line) area, there will be either a Neutral or Minor Beneficial Effect. Retention of any built infrastructure will be Adverse. 8.47. ES, Vol 1, Chapter 8 [APP-060] at Tables 8-19 Significant Visual Effects: Private Receptors and 8-20 Significant Visual Effects: Public Receptors, acknowledges that there will be significant adverse effects during Construction and at Operation Year 1, which will decrease in some cases at Operation Year 15 as the mitigation	The Landscape and Visual Impact Assessment (LVIA), presented in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060],** has been undertaken with consideration of the appropriate and relevant guidance and robustly assesses both the landscape and visual effects of the Scheme independently to ensure both the impacts and effects on the fabric and character of the landscape are taken into account as well as the views and visibility. A detailed LVIA methodology is included within **ES Volume 3: Appendix 8.1 [APP187],** which has been progressed and agreed with the Local Planning Authorities. As explained above land use change is assessed as part of the effect on landscape character within the 1km, 2km and 5km Study Areas. The extensive mitigation measures embedded within the Scheme are set out in Section 8.9 of the LVIA as set out in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]** and include General Offsets / Buffers as set out in Table 8-11 and a series of Landscape Design Parameters as set out in Table 8-12. These measures were informed by: • Statements of Environmental Opportunities for NCA Profile: 107- Cotswolds and NCA Profile: 117- Avon Vales as defined by Natural England; Broad Management Objectives

			matures. Decommissioning will experience some Significant Adverse visual effects due to the nature and scale of the work to be undertaken, and this is acknowledged in the ES assessments. This will decrease considerably once decommissioning is complete and the legacy landscape remain.	for LCT 16: Limestone Lowland LCA (16A: Malmesbury-Corsham Limestone Lowlands) as defined by the Wilshire Landscape Character Assessment; • Management guidelines and strategy actions for LCA 8: Hullavington Rolling Lowland as defined in the North Wiltshire Landscape Character Assessment; and • Landscape Strategy and Guidelines for LCT 14 Cornbrash Lowlands (LCT 11 Dip Slope Lowland) and LCA 14B West Malmesbury Lowland Farmland (LCA 11A South and Mid Cotswolds Lowlands) as defined in the Cotswolds Landscape Character Assessment The Approach to mitigation has also been informed by Wiltshire's Nature Recovery Strategy (still in draft at time of submission) and the Cotswolds Nature Recovery Plan in conjunction with liaison with the project Ecologist and consultation with officers at Wiltshire Council and the CNLB. A technical note to clarify how landscape fabric and landscape character is considered within the assessment will be provided at Deadline 1 and will be provided directly to Wiltshire Council.

WC-063	Landscape and Visual	Cotswolds National Landscape	8.48. The Cotswolds National Landscape is an important material planning consideration. It has been assessed as its own standalone receptor in [APP-197] ES Vol 3, Appendix 8.6 – Assessment of Effects on the Cotswolds National Landscape and its Special Qualities [APP-197]. 8.49. This Appendix includes assessment of the impacts of the proposal upon landscape character and visual amenity, drawing on the findings of the LVIA and also assesses the effects of the proposals on the special qualities of the Cotswolds National Landscape. This Appendix also considers the enhancement measures incorporated into the scheme, stated to further the purposes of the Cotswolds National Landscape. 8.50. The council considers that the CNL Conservation Board is better placed to offer technical comment in relation to matters directly and indirectly impacting the CNL and its special qualities.	The Applicant notes this comment.

WC-064	Landscape and Visual	Rochdale Envelope	8.51. The Applicant is relying on the Rochdale Envelope as the method by which they will be able to make changes to the DCO scheme. However, the Rochdale Envelope relies upon the maximum and minimum parameters having been established during the EIA. There is limited evidence that the worst-case scenario assessment has been carried out within Chapter 8 of the ES [APP-060]. 8.52. Version 3 of 'Nationally Significant Infrastructure Projects – Advice Note Nine: Rochdale Envelope' updated in March 2025, gives guidance on the use of the Rochdale Envelope. 8.53. Paragraph 2.3 (Judge (Sullivan J. (as he then was)) in Milne (No. 2) ('the Judgment')), is clear in that the assessment should be carried out on the worst case scenario; contain sufficient information to enable the main and likely significant effects to be assessed and mitigation measures to be described; and that the need for flexibility should not be abused. It states: *"This does not give developers an excuse to provide inadequate descriptions of their projects. It will be for the authority responsible for issuing the development consent to decide whether it is satisfied, given the nature of the project in question, that it has 'full knowledge' of its likely significant effects on the environment. If it considers that an unnecessary degree of flexibility, and hence uncertainty as to the likely significant environmental effects, has been incorporated into the*	The Applicant notes this comment. Full details of how the EIA has been undertaken adopting the principles of Rochdale Envelope and the Design Parameters (Table 3-1) used for the Environmental Statement are set out in **ES Volume 1 Chapter 3: The Scheme [APP055].** The maximum and minimum parameters of the Scheme are set out in 7.4 **Design Principles and Parameters [APP-269],** which are secured by Requirement 5 in the **draft Development Consent Order [APP-016]**. The LVIA has undertaken a worst-case scenario assessment based on these Design Parameters.

			description of the development, then it can require more detail, or refuse consent" (para 95 of the Judgment); *8.54. Paragraph 2.4 provides additional insight into the practical application of the above judgement. The key principles in the context of the DCO application are summarised below:* *• the DCO application documents should explain the need for and the timescales associated with the flexibility sought and this should be established within clearly defined parameters;* *• the clearly defined parameters established for the Proposed Development must be sufficiently detailed to enable a proper assessment of the likely significant environmental effects and to allow for the identification of necessary mitigation, if necessary within a range of possibilities;* *• the assessments in the ES should be consistent with the clearly defined parameters and ensure a robust assessment of the likely significant effects;* *• the DCO must not permit the Proposed Development to extend beyond the 'clearly defined parameters' which have been requested and assessed. The Secretary of State may choose to impose requirements to ensure that the Proposed Development is constrained in this way;* *• the more detailed the DCO application is, the easier it will be to ensure compliance with the Regulations.*	

WC-065	Landscape and Visual	Draft DCO and Control Document Considerations	8.55. Schedule 2 of the draft DCO (3.1) [APP-016] includes the Requirement for submission of a written 'Landscape and Ecological Management Plan' (LEMP) for the LPA's approval as prescribed by DCO Requirement 7, under schedule 2, which must be substantially in accordance with the outline LEMP. 8.56. The draft DCO also includes a Requirement for submission of a written 'ecological protection and mitigation strategy' (EPMS) for the LPA's approval as prescribed by DCO Requirement 8, under schedule 2, which must be substantially in accordance with the outline EPMS. 8.57.Given that both of the above DCO Requirements (7 & 8) anticipate some refinements and changes to suit the flexible design parameter approach under Rochdale Envelope principles, it seems logical that the currently presented 'Landscape and Ecology Mitigation Plan(s)' illustrated by ES, Vol 2, 6.2, Figures 3-4-1 to 3-4-5.2 [APP-084] would also likely require update amendments as they illustrate the spatial arrangement of the landscape and ecology proposals. This is considered important for planning enforcement function during the operational and maintenance phase of the project. The draft DCO should include provision for this. 8.58. There is a risk that DCO Requirements, 7, 8 and 9 (10% BNG) could produce slightly different strategy	The Applicant notes the comments at 8.55 and 8.56 With reference to 8.57 and 8.58, the 'Landscape and Ecology Mitigation Plan(s) in **ES Volume 2, 6.2, Figures 3-4-1 to 3-4-5.2 [APP-084]** would secure the areas of specific mitigation planting and are not going to change as a result of detailed design, because they are designed around the maximum parameters of the Scheme. The final detailed plans would be consistent with the drawings in **ES Volume 2, 6.2, Figures 3-4-1 to 3-4-5.2 [APP-084]** and ultimately would need to be signed off by Wiltshire Council. A revised plan would be attached to the detailed Landscape and Ecological Management Plan.

			and management plan outputs / expectations. These need to be carefully co-ordinated or combined so that they do not conflict with each other, to ensure there is a clear landscape scheme for future planning enforcement and monitoring purposes.	

WC-066	Landscape and Visual	Draft DCO and Control Document Considerations	8.59. Furthermore, the Outline Construction Environmental Management Plan (oCEMP) and outline Landscape and Ecological Management Plan (oLEMP) are broad brush documents which will provide a framework for the preparation of the final CEMP (DCO Requirement 13) and LEMP (DCO Requirement 7) documents to be prepared in broad accordance with. Both documents are proposed to be secured as specific DCO requirements, requiring final approval by the LPA based on the final scheme design. 8.60. The information included within the outline LEMP (7.18) [APP-283], appears reasonable for this stage of the application process given that the Applicant seeks some final design flexibility. The outline LEMP should be read alongside the 'Landscape and Ecology Mitigation Plan' ES Vol 2, 6.2, Figures 3-4-1 to 3-4-5.2 [APP-084]. These figures illustrate the principle of the envisaged landscape and ecological mitigation proposals for each of the areas (Sites A to E) based on the current illustrative design layout. No specific landscape and visual concerns are raised in relation to the content of the outline LEMP at this stage. However, this document should acknowledge within the introduction at Section 1 that the purpose of this document should also recognise its function to detail management of any specific landscape and visual mitigation measures identified through the LVIA	The Applicant notes the comment at paragraph 8.59. The Applicant will review the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]** and will update the introduction with the suggested changes. An amended version will be submitted at Deadline 1. With reference to 8.61, the 'Landscape and Ecology Mitigation Plan(s) in **ES Volume 2, 6.2, Figures 3-4-1 to 3-4-5.2 [APP-084]** would secure the areas of specific mitigation planting and would not significantly change as a result of detailed design, because they are designed around the maximum parameters of the Scheme. The final detailed plans would be consistent with the drawings in **ES Volume 2, 6.2, Figures 3-4-1 to 3-4-5.2 [APP-084]** and ultimately would be approved by Wiltshire Council. A revised plan would be attached to the detailed Landscape and Ecological Management Plan. The detailed Landscape and Ecological Management Plan (LEMP), which will need to be substantially in accordance with the **OLEMP [APP-283]**, will be appropriate for the management requirements of the Scheme. The Applicant does not intend to confirm at this stage whether or not one LEMP for each of the five Solar PV Sites will be prepared, but will continue to consult with Wiltshire Council on the most appropriate approach in this regard at the detailed design stage.

			e.g. maintain hedges at a lower height adjoining the CNL boundary or to develop and maintain structured screening of solar and BESS infrastructure, in order to ensure residual landscape and visual effects and impacts are reduced in line with assessment. 8.61.Alongside the LEMP there should be a tandem or combined DCO Requirement to update the Landscape and Ecology Mitigation Plan(s) [APP-084] with further detail based on any finally agreed scheme. The final LEMP report must be accompanied by relevant plans illustrating the spatial relationship of features and habitats to be established, managed and monitored on the ground and to provide a clearly enforceable planning scheme. 8.62. The LEMP gives a general overview but does not currently provide the level of detail required to ensure that the landscape and ecological mitigation and enhancement measures are going to be adequately dealt with. It is recommended that the final LEMP should start with an overview of the project and the general LEMP recommendations; then a LEMP is then detailed for each of the five Sites (A-E) and the CRC. These are still very large areas, but the project areas can be broken down into manageable parts, which will incorporate differences in the planting and management requirements across the sites and CRC. Any final LEMP needs to be accompanied by	Within the Cable Route Corridor (CRC), any existing habitats impacted by cabling works will be reinstated following temporary works and thereafter control of the land given back to the landowners. As such, it is not appropriate in the Applicant's view to prescribe ongoing management of habitats within the Cable Route Corridor within the **OLEMP [APP-283]** so as to minimise impacts on relevant landowners.

			clear plans to ensure the management prescriptions within the written report relate to the spatial arrangement and management requirements on site. 8.63. The LPA does not agree that the CRC should not be included within the LEMP, although the wording at Section 1.1.6 of the Outline LEMP [APP-283] is somewhat ambiguous and it is not clear what, or whether any management at all is proposed. However, it is essential that the planting specifications and management regimes are secured for the reinstatement and successful establishment of landscape features and ecological habitats along the route alongside longer-term management recommendations. The LPA considers this should be secured with a CRC LEMP. This might run for a much shorter timeframe i.e. 5yrs, which would align with the typical establishment and maintenance period for a standard conditioned landscaping scheme. 8.64. The outline CEMP is relatively broadbrush and the final iteration can be issued as an overarching document. However, site specific (A-E) and CRC issues should be grouped together for ease of interpretation and future use.	

WC-067	Ecology and Biodiversity	Policy Considerations	Policy Considerations 9.1.Section 9.3 of the ES Vol 1, 6.1 Chapter 9: Ecology and Biodiversity [APP-061] provides a comprehensive list of relevant ecological legislation, national planning policy and local planning policy pertinent to the project. 9.2. Local planning policy cited has included relevant policies from the Wiltshire Local Plan Pre-Submission Draft 2020-2038 (Regulation 19) (hereafter referred to as draft Local Plan), namely Policy 86 Renewable Energy, Policy 88 Biodiversity and Geodiversity, Policy 89 Biodiversity Net Gain, Policy 90 Woodland, Hedgerows and Trees and Policy 93 Green and Blue Infrastructure. This is welcomed because the draft Local Plan, which is currently at Examination, presents Wiltshire Council's policy intent and as stipulated in Paragraph 49 of the National Planning Policy Framework (NPPF) (December 2024), weight may be given to relevant policies in emerging plans. However, the weight to be attributed to the draft Local Plan is subject to the provisions of clauses a) to c) of Paragraph 49 and will be a matter for the decision-making authority (Secretary of State) and the Examining Authority (the Planning Inspectorate (PINS)). 9.3. The approach taken to the project as detailed in ES Vol 1, 6.1 Chapter 9 Ecology and Biodiversity [APP-06]) has had due regard to the requirements of the NPPF and Core policy 50 Biodiversity and Geodiversity of the Wiltshire Core Strategy (WCS)	The Applicant notes the Council's comments on the relevant ecological legislation and national and local policy cited. The Applicant acknowledges that some adverse ecological effects are unavoidable. These are transparently reported within **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]** and are summarised within the residual effects summary tables (Table 9-14 and 9-15). The Chapter provides a balanced assessment of likely significant effects, identifying residual effects where these remain after mitigation. Unavoidable losses of priority habitats, including hedgerows, have been minimised through careful design and are subsequently addressed through mitigation, compensation and long-term management to be secured via DCO Requirements including the **Outline Landscape and Ecological Management Plan (Outline LEMP) [APP-283]** and the **Outline Ecological Protection and Mitigation Strategy (Outline EPMS) [APP-284].** The Applicant considers that residual significant effects on habitats and species are clearly set out within **ES Volume1, Chapter 9: Ecology and Biodiversity [APP-061]** in line with EIA guidance and are limited to short-term loss of hedgerows and displacement of ground nesting birds, which have been mitigated for as far as possible within the Scheme, and the residual adverse

			(Adopted January 2015), and the principle of the mitigation hierarchy has been followed as far as possible in accordance with Core policy 50. Nonetheless, it is inevitable given the extent of the Order Limits and the scale and nature of the proposed Nationally Significant Infrastructure Project (NSIP), that there will be impacts upon ecological receptors and features during the construction, operation and decommissioning phases that result in adverse effects that cannot be entirely mitigated. For example, there will inevitably be some adverse effects on priority habitats / habitats of principal importance (HPI) listed under Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006 such as on account of hedgerow removal. Therefore, it is considered unlikely to be possible for the proposed Scheme to wholly comply with all requirements of national and local planning policy. 9.4. In addition, it is considered that overall, the potential for adverse effects on ecological features and receptors as a result of the proposals is consistently under-estimated, notably in relation to construction related impacts within the Cable Route Corridor (CRC). This overarching issue was also raised in the Council's statutory consultation response (March 2025).	effects will be balanced against the Scheme's benefits. The Applicant does not agree that adverse ecological effects, including those associated with construction within the Cable Route Corridor, have been under-estimated. The assessment is based on robust baseline habitat and habitat suitability data, a realistic worst-case construction scenario and the application of embedded and secured mitigation measures, including through the **Outline EPMS [APP-284]** Temporary construction effects within the Cable Route Corridor have been explicitly assessed, and residual effects reported where relevant. The Applicant considers the conclusions of ES Chapter 9 to be based on a robust and proportionate assessment and consistent with accepted Environmental Impact Assessment practice. Annex B of the **Planning Statement [APP-267]** provides an assessment of the Scheme against the emerging Wiltshire Local Plan policies, including Policy 86 Renewable Energy, Policy 88 Biodiversity and Geodiversity, Policy 89 Biodiversity Net Gain, Policy 90 Woodland, Hedgerows and Trees and Policy 93 Green and Blue Infrastructure.

WC-068	Ecology and Biodiversity	Environmental Assessment Considerations	Rochdale Envelope Approach 9.5. ES Vol 1, 6.1 Chapter 3: The Scheme [APP-055] sets out the Applicant's intent to rely on the 'Rochdale Envelope' approach to the environmental assessment. Planning Inspectorate Guidance: Nationally Significant Infrastructure Projects – Advice Note Nine: Rochdale Envelope states at paragraph 1.2: *"The 'Rochdale Envelope' approach is employed where the nature of the Proposed Development means that some details of the whole project have not been confirmed (for instance the precise dimensions of structures) when the application is submitted, and flexibility is sought to address uncertainty."* 9.6. Paragraph 1.3 of Advice Note Nine goes on to state: *"However, Energy (EN-1), the NPS for Renewable Energy Infrastructure (EN-3) and the NPS for National Networks all stress the need to ensure that the significant effects of a Proposed Development have been properly assessed."* *9.7. Paragraph 1.4 of the Advice Note Nine stipulates: "If flexibility is sought then it is essential that Applicants ensure the following is achieved:* *• that the approach is explained clearly for the purpose of consultation and publicity at the Pre-application stage;* *• that the **ES** explains fully how the flexibility sought has been taken into account in the assessments and why it is required; and* *• that there is consistency across the application documents including any*	The Applicant acknowledges Wiltshire Council's comments on the use of the Rochdale Envelope. As set out in **Chapter 3: The Scheme [APP-055],** the extent and purpose of the design flexibility sought have been clearly defined and follow the Planning Inspectorate's Advice Note Nine. The flexibility is targeted and proportionate, not an unrestricted ability to alter all aspects of the Scheme. In line with paragraphs 1.2–1.4 of the Advice Note: • The Rochdale Envelope approach was explained during pre-application consultation, supported by the PEIR and statutory consultation materials. • **ES Volume 1 Chapter 6: EIA Methodology [APP-058]** sets out *"for each technical discipline, the maximum (and where relevant, minimum) parameters for the elements where flexibility needs to be retained have been assessed under the Rochdale Envelope approach. The approach also recognises that the worst-case parameter for one technical assessment may differ from another, ensuring that worst case overall impacts are predicted. Each technical chapter (**ES Volume 1, Chapter 7 to Chapter 20 [APP-059 to APP-072**)*

			other relevant environmental assessments (e.g Habitats Regulations Assessment (HRA) or Water Framework Directive (WFD) assessment).” 9.8. Whilst it is recognised that the Applicant has the option to use this approach, APP-055 details the scope of the intended approach and it is evident that the Applicant effectively wants flexibility over all aspects of the Scheme and would therefore be able to make changes to any aspect of the Scheme. This does present some concerns for Wiltshire Council’s ecology team because as specified in paragraph 3.2.23 of APP-055, the Rochdale Envelope approach to assessment relies upon the maximum, and where relevant, the minimum parameters having been established and considered in detail during the Environmental Impact Assessment (EIA) to ensure the realistic worst-case effects of the Scheme are assessed for each potential receptor, however, it is not always apparent this has been the case. Furthermore, it is not entirely clear whether the requirements of the second and third bullet points of paragraph 1.4 of Advice Note Nine have been wholly fulfilled, and as such it is recommended that the Examining Authority gives this due consideration.	*describes the parameters applied in relation to the relevant assessment.”* • The parameters and assumptions are applied consistently across the ES. The Applicant does not agree that worst-case parameters are unclear. **Chapter 3: The Scheme [APP-055]** and the individual technical chapters set out the relevant design parameters which underpin the precautionary assessments. The Applicant is therefore satisfied that the requirements of Advice Note Nine have been met and that the ES provides the Examining Authority with a robust and transparent basis for assessing likely significant effects. In relation to ecology and biodiversity, the Applicant considers that the Rochdale Envelope has been applied in accordance with Planning Inspectorate Advice Note Nine and that the assessment presented in **ES Volume 1, Chapter 9 Ecology and Biodiversity [APP-061]** assesses the realistic worst-case effects on all ecological receptors. The assessment presented in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]** has been undertaken using precautionary worst-case assumptions, including the reasonably anticipated maximum extent of land take, infrastructure footprint and

				timescales of construction activities. For example, a reasonable estimate of calculated permanent and temporary hedgerow removal requirements are set out in **ES Volume 1, Chapter 9; Ecology and Biodiversity [APP-061]** (paragraph 9.10.1380) and shown on a plan within the **Outline Ecological Protection and Mitigation Strategy (OEPMS) [APP-284].** The Applicant acknowledges the final extent of permanent and temporary hedgerow removal cannot be determined until the detailed design stage. The estimates provided are however considered a reasonable precautionary, and likely worst-case scenario. The parameters assessed are consistent with those applied in the **Habitats Regulations Assessment Report [APP-275].** Any subsequent design refinement will be required to remain within the assessed parameters and will be controlled through the DCO Requirements, including the Outline EPMS and Outline LEMP, which provide further assurance that ecological mitigation and enhancement will be secured. These prescribe certain parameters that constrain post-consent design (for example, maximum width of hedgerow breaches within the Cable Route Corridor) and will ensure no greater ecological effects could arise than those reported. The Applicant therefore considers that the Rochdale Envelope has been applied correctly for ecology and that

				ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061 provides a robust assessment on which the Examining Authority can rely
WC-069	Ecology and Biodiversity	Cable Route Corridor	9.9. In ES Vol 1, 6.1 Chapter 4: Alternatives and Design [APP-056], paragraph 4.6.11 specifies that the cable route corridor (CRC) may be up to 600m wide in some locations, whereas other DCO application documents state that it would be up to 665m in some locations. This discrepancy should be rectified, and it has been assumed that the reference to 665m width is correct.	As stated in the Applicant's response to advice and observations provided at acceptance in the **Application Form [APP-002]**, the Applicant confirms that the width stated should be 665m and that as this is a minor typographical error, the Applicant does not propose to update and resubmit the document unless any substantive amendments are required.
WC-070	Ecology and Biodiversity	Cable Route Corridor	9.10. With the exception of habitat surveys which have been undertaken across most of the CRC since Wiltshire Council provided its statutory consultation response (March 2025), there doesn't appear to have been any other ecological or species-specific survey conducted within the CRC to inform the ES and DCO application. The overarching rationale provided for this in the ES and associated appendices is that impacts within the CRC will effectively be restricted to primarily temporary construction related impacts. The council considers that this is not a sufficiently robust justification for the lack of species-specific and further ecological survey. As such, the council remains concerned regarding the lack of ecological baseline data and	The Applicant notes the Council's comments regarding the scope of ecological survey within the Cable Route Corridor (CRC). Habitat surveys have been undertaken across the entirety of the CRC, including at additional areas completed following the Council's statutory consultation response, and this data has informed the assessment presented in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061].** The scope of ecological and species-specific survey within the CRC was defined using a proportionate, risk-based approach. Survey scope and effort across the Order Limits were targeted to areas and features where there was a reasonable likelihood of

			information that has been collated for the CRC and surrounding areas and considers that the potential significance of effects upon ecological receptors and features within the CRC and the surrounding vicinity over the approximate 18-month construction period and beyond, has potentially been under-estimated. 9.11. It should be noted that approximately 17 ha of land within the CRC has not been accessed for the purposes of ecological survey and as such, there is a gap in the ecological baseline information (this is discussed further below).	significant effects, rather than applied uniformly across the Order Limits irrespective of risk. The assessment has had regard to the short-term, temporary and construction-phase nature of works within the CRC, the absence of permanent operational effects, and a robust appraisal of habitat suitability for species based on baseline habitat data collected through surveys. Based on this a reduced survey effort within the Cable Route Corridor has been undertaken compared to the Solar PV Sites. This is consistent with the approach to cable route baseline surveys adopted for other similar consented solar NSIP schemes which feature significant cable routes, including West Burton Solar Project [EN010132], Cottam Solar Project [EN010133], Byers Gill Solar [EN010139] and Botley West Solar Farm [EN010147]. Potential impacts within the CRC, including temporary habitat loss, disturbance and fragmentation, have been assessed on a precautionary reasonable worst-case basis. This assumes that works within the CRC will be progressive over the approximate 18-month period, within which no one single area of the CRC will be under construction for the expected 18-month duration of works in the overall CRC. Embedded mitigation and further controls secured through the **Outline EPMS [APP-284]**, including pre-construction surveys and inspections,

				micro-siting of cabling works, appointment of an Ecological Clerk of Works and species-specific protection measures, where appropriate, provide a recognised mechanism for managing residual risk. Furthermore, reinstatement of any disturbed habitats will take place as a priority following construction within the CRC. The Applicant does not agree that the survey approach results in an under-estimation of effects. The baseline information is considered sufficient to support a robust and proportionate assessment of likely significant effects within the CRC, and the conclusions of **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-**061**]** remain appropriate and justified.
WC-071	Ecology and Biodiversity	Cable Route Corridor	9.12. Section 9.9 of ES Vol 1, 6.1 Chapter 9: Ecology and Biodiversity [APP-061] details 'embedded' design measures. Under the heading of 'Construction Phase Embedded Mitigation' it is detailed that buffers from field boundary habitats and other ecological features will be implemented and that buffers will not contain any array structures, hard standing or electrical hardware. It is assumed that these ecological buffers will be implemented within the CRC. However, it is stated in ES Vol 1, 6.1 Chapter 2: The Order Limits [APP-054] that within the CRC, where practicable, cable routing would be to the edge of fields to minimise impacts. This approach would fail to accord with the embedded mitigation measures put forward in	The Applicant notes the comments regarding the application of embedded mitigation measures within the Cable Route Corridor (CRC) and the relationship between **ES Volume 1, Chapter 9 [APP-061]** and **Chapter 2 [APP-054].** The reference in Chapter 2 to routing cables towards the edge of fields reflects an indicative design principle intended to reduce land take and disruption to agricultural operations where practicable. It does not override or negate the embedded mitigation measures set out elsewhere within the Environmental Statement. Within the CRC, the ecological buffers described in **ES Volume 1, Chapter 9:**

			APP-061, given that to undertake the works in this way would not permit the implementation of buffers from important ecological features along field boundaries. As such, it is unclear why APP-054 has specified that routing cables to the edge of fields would minimise impacts; it is queried whether this is referring to impacts on agricultural land uses / arable production. Routing cables along field boundaries will likely increase the potential for ecological and arboricultural impacts due to adverse effects on sensitive field boundary habitat including hedgerows, hedgerow trees and arable field margin flora as well as the fauna that use these habitats. 9.13. In addition, paragraph 3.3.58 of ES Vol 1, 6.1 Chapter 3: The Scheme [APP-055] states: "Fibre communication chambers will be installed typically every 500 to 750m but can be up to 2,000 m apart along the cable route. These are generally located at field boundaries. The final locations would be determined at detailed design. The excavation for this type of chamber would be approximately 1.5 m length, 1 m wide and 1.5 m deep." This further suggests that there will be works within proximity to sensitive field boundary habitats including hedgerows and trees, and that the implementation of a buffer zone at these locations will not be possible contrary to the indication in ES Vol 1, 6.1 Chapter 9: Ecology and Biodiversity [APP-061].	**Ecology and Biodiversity [APP-061]** will be implemented where practicable, informed by detailed design and local site conditions. Notwithstanding this, all tree and hedgerow Root Protection Areas (RPAs) will be respected, and works will be designed to avoid encroachment into RPAs in accordance with best practice arboricultural guidance. Hedgerows, hedgerow trees and associated field boundary habitats are therefore afforded protection irrespective of the final cable alignment. Where routing adjacent to field boundaries is proposed, this will be subject to detailed assessment at the construction stage to ensure that unacceptable ecological or arboricultural effects are avoided. This will be secured through the **Outline EPMS [APP-284]** and **Outline Arboricultural Method Statement [APP-206],** which will define working methods, exclusion zones and protection measures as appropriate. A risk-based approach to micrositing of the final cable route will take into account the presence of priority habitats and habitat of suitability for various protected species and species of conservation concern. Accordingly, the Applicant does not agree that routing cables towards field edges inherently increases ecological impacts, nor that there is a conflict between **ES Volume 1, Chapter 2: The Order Limits [APP-054]** and **ES Volume 1, Chapter 9: Ecology and**

				Biodiversity [APP-061]. The final alignment within the CRC will be determined through detailed design, applying the mitigation hierarchy and ensuring protection of sensitive ecological and arboricultural features.
WC-072	Ecology and Biodiversity	Targeted Consultation	9.14.In June 2025, the Applicant consulted on fifteen proposed changes to the Scheme via a targeted consultation. It is noted that the proposed changes have been taken forward and incorporated within the Scheme proposals as detailed in the DCO application submission documentation and figures. The council raised concerns regarding a couple of the proposed locations and remains concerned, particularly in regard to: • Change 7: South West of Rodbourne, Lime Down E where works have potential to impact the edge of an ancient broadleaved woodland / priority habitat / HPI that is known as North Bincombe Wood and is also designated as a CWS named Rodbourne Plantation; and • Change Location 10: A429 / B4014 Roundabout where the potential for impacts to traditional orchard priority habitat / HPI should be determined and addressed, where necessary;	The Applicant notes these comments. The Traditional Orchard referred to with reference to Change Location 10 lies within a private residential property and is outside of the Order Limits, beyond an existing road verge. Change Location 10 refers to a Highway Improvement Area, which as stated in paragraph 3.2.5 of **ES Volume 1, Chapter 3: The Scheme [APP-055]** comprises a section of the highway network which will be subject to localised improvements. Any such works at this location would not extend into the curtilage of the private property and thus no impacts to the Traditional Orchard within are anticipated. Within **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**, any potential impacts on Rodbourne Plantation LWS (relevant to change location 7) as a result of the Scheme are assessed at paragraphs 9.10.70 to 9.10.81. Regarding Change 7 at north Bincombe wood, there is an existing farm track and impacts to North Bincombe Wood are identified as an incursion into ancient woodland buffer and the likely requirement for a crown raise of overhanging branches if required to facilitate construction traffic. Within **ES**

				Volume 3, Appendix 10-1 [APP-206] any potential impacts on North Bincombe Wood (relevant to change location 7) as a result of the Scheme are identified in Table 7 and explored in Paragraph 4.1.10. The overall impacts to North Bincombe Wood as a result of the access track installation are expected to be negligible.
WC-073	Ecology and Biodiversity	Availability of Confidential Reports	Availability of Confidential Reports and Figures and Redaction / Obscuring of Information 9.15. ES Vol 3, 6.3 Appendix 9-2 [APP-199] and 9-8 [APP-205] and the ES Vol 2, Figure 9-2-1 to 9-2-5 [APP-115] and Figure 9-2-6 to 9-2-10 [APP-116], the badger sett figures for the Solar PV Sites and CRC, are listed as confidential. These reports were not provided to the council and had to be specifically requested by the council's Ecology Officer, thereby frustrating the review process which was already very tight in terms of timeframe. 9.16. In addition, key information is redacted / obscured throughout the entirety of ES Vol 1, 6.1 Chapter 9: Ecology and Biodiversity [APP-061] which hindered the review process significantly. It is unfortunate that the Applicant did not provide an unredacted version of the chapter to the council to aid review, not even after the request for the confidential documentation cited in the preceding paragraph.	The Applicant notes these comments. **Appendices 9-2 [APP-199]** and **9-8 [APP-205]** as well as corresponding **Figure 9-2-1 to 9-2-5 [APP-115]** and **9-2-6 and 9-2-10 [APP-116]** were made confidential at the instruction of PINS due to containing sensitive information relating to species at risk of persecution. These documents are available on request to those with a legitimate need to view them, and the Applicant promptly provided them following the receipt a request from the Council. The redaction of certain information from **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]** was a decision made post-submission by PINS and not the Applicant. An unredacted version of the Chapter will be made available for the Council's review.

WC-074	Ecology and Biodiversity Description and DCO Process	132kV Substations	132kV Substations 9.17. The DCO application documentation doesn't appear to stipulate how many 132kV substations are proposed. Paragraph 3.3.37 of ES Vol 1, 6.1 Chapter 3: The Scheme [APP-055] reads as though it intended to specify the number of 132kV substations proposed, and yet omits the number presumably in error as it states: "*Up to 132 kV Substations will be located at Lime Down A, Lime Down C, Lime Down D and Lime Down E (refer to ES Volume 2, Figure 3-1: Indicative Site Layout Plan [EN010168/APP/6.2]).*" It shouldn't be necessary to cross-reference to plans in order to attain this key information about proposed Scheme infrastructure.	The Applicant notes this comment. The quote in **ES Volume 1, Chapter 3 The Scheme [APP-055]** refers to the maximum kilovolts planned for the substation within those land parcels. **Figure 3-1: Indicative Site Layout Plan [APP-081]** illustrates four 132kV substations within the Order Limits (one in each of the Sites mentioned).
WC-075	Ecology and Biodiversity	Ecological Baseline Methodology	Desk Study 9.18. Section 2.2 of ES Vol 3, 6.3 Appendix 9-1: Ecological Baseline Report [APP-198] presents details of the desk study undertaken. In respect of the CRC, paragraph 2.2.5 states: "Data pertaining to designated sites and Priority Habitat within the Cable Route Corridor was consulted during the desk study exercise using the same sources. Given the temporary and limited nature of impacts associated with construction activities within the Cable Route Corridor, and that the construction working area will be refined further to an approximate width of 25 m, data pertaining to designated sites and Priority Habitats within a search radius around (i.e. beyond) the Cable Route Corridor was not considered proportionate."	The Applicant notes the Council's comments regarding the scope of the desk study undertaken for the Cable Route Corridor (CRC), as set out in **ES Volume 3, Appendix 9-1: Ecological Baseline Report [APP-198].** The desk study methodology for the CRC was defined using a proportionate approach, having regard to the temporary nature of works, the absence of permanent operational effects, and the refinement of the construction working width for cabling works to approximately 25 m (narrower at hedgerow breaches). On this basis, desk study searches for designated sites and Priority Habitats were focused on features within the CRC. It is noted that a wider search area for non-statutory designated sites was adopted

			9.19. Thus, the desk study exercise has not entailed a search for, and identification of, statutory and non-statutory designated sites beyond the CRC. The council would have at the very least expected 2km and 1km search areas around the CRC to be used to obtain information relating to statutory and non-statutory designated sites respectively. 9.20. The desk methodology in relation to the CRC is therefore a concern to the council as it has not facilitated the identification of any international, national or local designated sites, HPI / priority habitats or ancient woodland beyond the CRC even though it extends the substantial distance of approximately 22km and will be up to approximately 665m in some locations and temporary construction compounds will be sited throughout the CRC. 9.21. The approach to the desk study method for the CRC and the underpinning rationale presented in the above extract from APP-198 is considered to be representative of the way that the potential mechanism for adverse effects on ecological receptors as a result of impacts associated with the proposed activities within the CRC has been under-estimated. The council considers that the perceived assumption that there will be no / limited pathways for impacts on ecological features and receptors beyond the construction footprint of the CRC to be incorrect. As such, the desk study methodology is considered inadequate particularly given that the	at the Preliminary Environmental Information Report (PEIR) stage of the project. At this stage, all non-statutory designated sites within the Cable Route Search Corridor (which covered a larger area than the CRC), were presented within the PEIR, and this information was used to help defined the narrower CRC. The Applicant does not agree that fixed 2 km and 1 km search radii are automatically required in all circumstances, but should be informed by the potential zone of influence of Scheme and the existence of credible impact pathways. For the CRC, works will occupy a smaller area than that covered by the Order Limits and will be temporary, contained and relatively low impact, and as such a low risk of impact pathways were identified for construction activities to give rise to likely significant effects on designated sites, ancient woodland or priority habitats beyond the CRC itself. Notwithstanding this, the assessment has had regard to the wider ecological context through desk study information, statutory datasets and baseline data collected across the Order Limits. Where relevant receptors are present in proximity to the CRC, potential indirect effects (such as disturbance) have been considered using a precautionary worst-case approach. The Rochdale Envelope has been applied appropriately, with the CRC

			Applicant has opted to rely on the Rochdale Envelope approach and that the realistic worst-case effects of the CRC should be assessed for all potential ecological receptors.	assessed on the basis of the maximum reasonable construction footprint and duration. Embedded mitigation and controls secured through the **Outline CEMP [APP-277]** and **Outline EPMS [APP-284]** provide further assurance that effects beyond the CRC will be avoided. The Applicant therefore considers that the desk study methodology for the CRC is proportionate and sufficient to support a robust assessment of likely significant effects.
WC-076	Ecology and Biodiversity	Ecological Baseline Methodology	9.22. Paragraph 2.2.6 of ES Vol 3, 6.3 Appendix 9-1: Ecological Baseline Report [APP-198] goes on to detail that existing records of legally protected species and species of conservation concern within 500m of the CRC were obtained from WSBRC compared to the 2km search parameter used for the Solar PV Sites. As such, the search parameter for the acquisition of species records was restricted to the CRC itself. This is likewise considered inadequate given that the construction works will be substantive and be undertaken along an approximate 22km long route which will include temporary construction compounds with artificial lighting and that the CRC will be up to approximately 665m wide at some locations. This works footprint will comprise a considerable area when considered in totality. As such, it is deemed necessary to ensure that the desk study entails collation of data regarding protected species and species of conservation concern within	The Applicant notes the Council's comments regarding the search radius applied to the desk study for protected and notable species records within the Cable Route Corridor (CRC), as set out in **ES Volume 3, Appendix 9-1 [APP-198].** The 500 m search radius applied to the CRC was defined using a proportionate approach reflecting the short-term and temporary and nature of construction works and the absence of permanent operational effects. The approach differs from that applied to the Solar PV Sites, where long-term land-use change warranted a wider search area. For the CRC, the 500 m search radius was considered sufficient to identify relevant protected and notable species populations for which construction-phase impacts, such as disturbance, temporary habitat loss or fragmentation, could realistically occur.

			an adequate search area in order to aid assessment of the potential for presence of species / species groups within the construction working area and within adjoining / nearby habitats so as to be suitably precautionary and to align with industry best practice. Moreover, there have been no species-specific or Phase 2 surveys within the CRC, and so the acquisition of more comprehensive data would be expected to augment the ecological baseline.	The Applicant does not agree that the scale or length of the CRC necessitates a wider desk study search radius. Temporary construction compounds and associated lighting will be subject to embedded mitigation and controls secured through the **Outline CEMP [APP-277]** and **Outline EPMS [APP-284]** limiting the potential for effects beyond the immediate working area. In addition to desk study data, the assessment has been informed by habitat surveys across the CRC, habitat suitability assessments for protected / notable species, and a precautionary worst-case assessment of construction impacts. Where uncertainty remains, mitigation measures including pre-construction checks and species protection measures to be secured via the **Outline EPMS [APP-284]** provide a robust mechanism to manage risk and ensure legal compliance as is typically employed in other similar consented schemes. The Applicant therefore considers that the desk study search radius applied to the CRC is proportionate and sufficient to support a robust assessment of likely significant effects, notwithstanding the absence of more extensive species-specific survey within the CRC.

WC-077	Ecology and Biodiversity	Ecological Baseline Methodology	9.23. The council again highlights the requirements given that the Applicant has opted to rely on the Rochdale Envelope approach in respect of the CRC and indeed, the Scheme in general, and of the need to be precautionary and to assess realistic worst-case effects of the CRC for all potential ecological receptors, including protected and notable species and species of conservation concern.	The Applicant considers that the Rochdale Envelope has been applied in a precautionary and proportionate manner, and that the assessment in respect of the CRC adequately addresses realistic worst-case effects for relevant ecological features.
WC-078	Ecology and Biodiversity	Ecological Baseline Methodology	9.24. By way of an example to augment the point being raised herein, if the council were to receive a dedicated planning application for a project akin to the CRC, covering a distance of approximately 22km and with a construction working area of up to approximately 665m wide at some locations along the route, which is clearly a considerable width, including the installation of temporary construction compounds along the route, the council would expect a comprehensive desk study to have been conducted in accordance with best practice so as to be suitably precautionary. This would ensure that sufficient information and data is provided to facilitate a robust and fully informed impact assessment. This would be the expectation even if the potential for effects would mainly occur during the construction phase.	The Applicant notes the Council's comments by way of example regarding the scale of the Cable Route Corridor (CRC) and the expectations for desk study scope. The Applicant clarifies that the figure of up to approximately 665 m refers to the maximum width of the Order Limits in certain locations within the CRC and does not represent the construction working area. The construction working width within the CRC will be substantially narrower and is anticipated to be refined to approximately 25 m (narrower at hedgerow breaches), with temporary works taking place in a progressive manner. The desk study methodology and the assessment of likely effects within **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]** has not been based on a construction working area being 665 m wide in any one location along the CRC. The desk study and assessment for the CRC have been undertaken applying a proportionate and precautionary

				approach that reflects the realistic worst-case construction scenario within the Rochdale Envelope. The assessment is based on the maximum reasonable construction footprint, duration and severity of works, and considers receptors for which there is a plausible pathway for impacts.
WC-079	Ecology and Biodiversity	Habitat Surveys	9.25. Section 2.3 of ES Vol 3, 6.3 Appendix 9-1: Ecological Baseline Report [APP-198] presents the methodology for the habitat surveys. It does not specify that survey of any of the fifteen areas where amendments to the development boundary were proposed and which were the subject of a Targeted Consultation in June 2025, have been undertaken. The proposed changes have now been subsumed within the red line boundary of the Scheme and so clarity regarding whether these areas have been surveyed should be sought, especially in relation to Change Locations 7 and 10. 9.26. Paragraph 2.6.7 of ES Vol 3, 6.3 Appendix 9-1: Ecological Baseline Report [APP-198] stipulates: "As of August 2025, approximately 17 ha of land within the Cable Route Corridor has not been accessed for ecological survey due to a lack of access	The Applicant notes the Council's comments and confirms that all of the fifteen areas subject to Targeted Consultation in June have been surveyed. The Applicant acknowledges that some areas within the Cable Route Corridor had not been subject to ecological survey at the point of finalising the **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**. Since the preparation of **ES Appendix 9-1 [APP-198]**, habitat surveys have now been completed across all previously unsurveyed areas. The survey methodology applied was consistent with that reported in the **ES Appendix 9-1 [APP-198]** for the rest of the Cable Route Corridor The results of these surveys have been reviewed and, in the Applicant's view, do not alter the conclusions of **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]** regarding

			permission. Habitats within these areas have therefore not been classified under UKHab and have not been assessed for their potential to support protected species. An assumption of the likely habitats present has been made, based on available desk study information (using satellite imagery and opensource datasets, where relevant), and the context of other habitats present within the local landscape. The precautionary principle has been applied when considering the habitat classification and suitability of habitats for protected species. Access agreements are being sought for these areas, and it is intended for all currently un-surveyed areas of the Cable Route Corridor to be surveyed. Following completion of the outstanding survey work, the results of the surveys will be submitted into the Examination and amendments to this appendix will be made, if required." 9.27. The un-surveyed area within the CRC is a concern for the council as the primary host authority. Although, it is stipulated in APP-198 that the precautionary principle has been applied, the absence of the associated ecological baseline data represents a significant omission and could give rise to inaccuracies in the ES.	likely significant effects. The precautionary assumptions previously applied in the ES were conservative and appropriately accounted for any uncertainty associated with un-surveyed areas. The Applicant has updated **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]** and a revised version will be submitted at Deadline 1 with the findings of these surveys, and it is considered these do not materially change the assessment of likely significant effects presented in the chapter.

WC-080	Ecology and Biodiversity	Ecological Baseline	Statutory Designated Sites Solar PV Sites 9.28. Paragraph 3.1.1 of ES Vol 3, 6.3 Appendix 9-1: Ecological Baseline Report [APP-198] states that …"*four international designated sites with qualifying mobile species (bats and/or migratory birds) were identified within the wider search radius of 30 km*." However, paragraph 3.1.2 then states: "*These five international designated sites are summarised in Table 9-1-2 below*." This discrepancy should be addressed.	The Applicant notes the Council's comments. To confirm, four international designated sites with qualifying mobile species (bats and/or migratory birds) were identified within the wider 30 km search radius, namely the Bath and Bradford-on-Avon Bats SAC, Severn Estuary SPA, Severn Estuary Ramsar, and Salisbury Plain SPA . In addition to these four sites, and as stated further in Paragraph 3.1.1 of **ES Volume 3, 6.3 Appendix 9-1: Ecological Baseline Report [APP-198]**, an additional international designated site (the Severn Estuary SAC) was scoped into the assessment. This was not on account of it supporting qualifying mobile species but rather on account of its hydrological connection to the scheme. Consequently, there are five international designated sites subsequently referred to in paragraph 3.1.2 and Table 9-1-2 and this is not a discrepancy.
WC-081	Ecology and Biodiversity	Ecological Baseline	Cable Route Corridor 9.29. As discussed earlier in this response, the desk study methodology for the CRC entailed identifying statutorily designated nature conservation sites within or immediately adjacent to the CRC only.	Please refer the Applicant's earlier response on this matter, in response to paragraphs 9.18 to 9.21 of the Council's comments.

WC-082	Ecology and Biodiversity	Ecological Baseline	Bath and Bradford-on-Avon Bats SAC 9.30. Paragraph 3.1.4 of ES Vol 3, 6.3 Appendix 9-1: Ecological Baseline Report [APP-198] identifies that a component area of the Bath and Bradford-on-Avon Bats Special Area of Conservation (SAC) lies approximately 3.77km west of the CRC at its closest point. Paragraph 3.1.7 then states: "*An amalgamation of up-to-date Core Areas are presented within the 'Impact Zones for Bat Species' layer on the publicly available 'Wiltshire Planning Explorer' map (Ref 9-1-26). The Cable Route Corridor intersects an Impact Zone for Bat Species for approximately 1.5 km (covering an area of approximately 10.5 ha) to the southeast of Corsham*." This does not recognise that the consultation zone that the CRC coincides with comprises the Bath and Bradford-on-Avon Bats SAC greater horseshoe bat consultation zone that encompasses a 4km radius around the Box Mine component of the SAC. This is illustrated on Plan 2 of the Bat SAC Planning Guidance for Wiltshire (Wiltshire Council and Natural England, September 2015) which is cited in paragraph 3.1.4. of APP-198. Nonetheless, in paragraph 1.3.19 of ES Vol 3, 6.3 Appendix 9-3 Bat Survey Report [APP-200] this is correctly identified. As such, it would be prudent for the same level of detail and description to have been transposed to APP-198 for consistency and completeness and given the requirement for the scheme to be assessed under The Conservation of	The Applicant notes the Council's comment. Whilst it is acknowledged that the relevant species for which the 4 km bat consultation zone around Box Hill mine is not specified in **ES Volume 3, Appendix 9-1: Ecological Baseline Report [APP-198]**, it is defined in **ES Volume 3, Appendix 9-3: Bat Survey Report [APP-200]** as acknowledged by the Council. Furthermore, the assessment of this area within Chapter 9 of the ES has recognised that this area comprises a consultation zone for greater horseshoe bats, as detailed in paragraph 9.10.11 **of ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]** and the omission of this level of detail from **ES Volume 3, Appendix 9-1: Ecological Baseline Report [APP-198]** does not affect the overall assessment of significant effects on the Bath and Bradford-on-Avon SAC made within the ES itself.

			Habitats and Species Regulations 2017 (as amended) (hereafter referred to as 'the Habitats Regulations').	
WC-083	Ecology and Biodiversity	Ecological Baseline	9.31. Paragraph 1.3.19 of ES Vol 3, 6.3 Appendix 9-3 Bat Survey Report [APP-200] also specifies that approximately 10.5 ha of the 4km greater horseshoe bat consultation zone around the Box Mine component of the SAC is intersected by the CRC and correctly suggests that this area should be assumed to be land that is functionally linked to the SAC. 9.32. It is important to note that the eastern extent of the CRC lies only just beyond the extent of the 1.5km core area around two Bechstein's bat core maternity roosts near Lackham to the south of Chippenham which have been assumed to be functionally and demographically linked to the Bath and Bradford-on-Avon Bats SAC in the absence of evidence to the contrary; this precautionary approach has been agreed with Natural England.	The Applicant notes these comments. Both areas referred to are correctly identified within the assessment (for instance at paragraphs 1.3.19 and 1.3.24 within **Volume 3, Appendix 9-3: Ecological Baseline Report [APP-200]** and on **Figure 9-1-4 [APP-110]** and are fully considered within the assessment, for instance within paragraphs 9.10.11 and 9.10.14 of the **Volume 1, ES Chapter 9: Ecology and Biodiversity [APP-061].**

WC-084	Ecology and Biodiversity	Ecological Baseline	9.33. The proximity of these core areas is recognised in ES Vol 3, 6.3 Appendix 9-3 Bat Survey Report [APP-200] as paragraph 1.3.24 states: "*Although the CRC does not intersect this Core Area, it does run between the Core Area (which lies to the east of the CRC) and the SAC (which lies to the west). It can therefore be assumed that Bechstein's bats associated with the Core Roosts to the east of the CRC may utilise habitats within the CRC to commute between those Core Roosts and the SAC*." The council welcomes the adoption of this precautionary approach especially given the need for Habitats Regulations Assessment (HRA) (the HRA is discussed under the Assessment heading).	The Applicant welcomes the Council's agreement of the precautionary approach taken with respect to this Core Area for Bechstein's bats

WC-085	Ecology and Biodiversity	Ecological Baseline	Non-Statutory Designated Sites Solar PV Sites and Cable Route Corridor 9.34. Non-statutory designated nature conservation sites within 2km of the solar PV sites are identified and listed in Table 9-1-4 in ES Vol 3, 6.3 Appendix 9-1: Ecological Baseline Report [APP-198] and yet as discussed above, the search parameter for the CRC comprised solely of the CRC itself with no search beyond the Order Limits. This is not considered to be adequate as the construction phase and associated activities could give rise to impacts on non-statutory designated sites and the species that utilise the sites, beyond the CRC itself, such as due to light spill from the temporary construction compounds, dust deposition and noise. Therefore, sufficient baseline information should be collated to inform a sound impact assessment. This includes the undertaking of an adequate desk study, the scope of which should be informed by a realistic and worst-case consideration of the potential mechanisms and pathways for effects, both direct and indirect, temporary and permanent. This is especially pertinent given the reliance of the DCO application on the Rochdale Envelope approach to the ES and hence, there is a need to apply the precautionary principle. It is considered that this requirement has not been wholly fulfilled.	The Applicant notes the Council's comments but considers that the desk study methodology for the CRC is proportionate and sufficient to support a robust assessment of likely significant effects. The Applicant does not agree that a wider search area for non-statutory designated sites is essential due to the short-term and temporary nature of works with the CRC and lack of plausible impact pathways. Temporary construction compounds (and associated lighting), dust deposition and noise impacts will be subject to embedded mitigation and additional controls secured through the **Outline CEMP [APP-277]** and **Outline EPMS [APP-284]**, limiting the potential for effects beyond the immediate working area. It is noted that a wider search area for non-statutory designated sites was adopted at the Preliminary Environmental Information Report (PEIR) stage of the project. At this stage, all non-statutory designated sites within the Cable Route Search Corridor (which covered a larger area than the CRC), were presented within the PEIR, and this information was used to help define the narrower CRC. The Applicant therefore considers the Rochdale Envelope has been applied appropriately, with the CRC assessed on the basis of the maximum reasonable construction impact. Embedded mitigation and controls secured through the **Outline CEMP**

				[APP-277] and **Outline EPMS [APP-284]** provide further assurance that effects beyond the CRC will be avoided.

WC-086	Ecology and Biodiversity	Ecological Baseline	Habitats 9.35. It is considered that it is not made sufficiently clear in paragraphs 3.2.3 to 3.2.7 of ES Vol 3, 6.3 Appendix 9-1: Ecological Baseline Report [APP-198] that the information presented regarding the presence of priority habitats relates to what has been identified during the desk study only rather than data and information collated regarding HPI within the Order Limits during field survey. As a result, it gives the incorrect impression that other HPIs / priority habitats are not present within the Solar PV Sites and CRC. It is suggested that a suitable heading is included along the lines of 'Desk Study Results'.	The Applicant notes this comment and acknowledges those priority habitats listed in those paragraphs relate to only priority habitats identified during the desk study. The text in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]** will be updated to make this clear and the revised version will be submitted at Deadline 1. It is considered that this does not change the conclusions presented in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**. All HPI / Priority Habitats present within the CRC are reported within the **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**.

WC-087	Ecology and Biodiversity	Ecological Baseline	Arable Field Margins - Solar PV Sites and CRC 9.36. Paragraph 3.2.16 – 3.2.21 of ES Vol 3, 6.3 Appendix 9-1: Ecological Baseline Report [APP-198] describes the arable field margins present within the Solar PV Sites and CRC in terms of the UKHab habitat types and extent of the habitat present. Paragraph 3.2.22 recognises the arable field margins present as comprising an HPI / priority habitat of Local Importance and the council concurs with this evaluation.	The Applicant welcomes the Council's comment

WC-088	Ecology and Biodiversity	Ecological Baseline	Modified Grassland – Solar PV Sites and CRC 9.37. Paragraph 3.2.24 ES Vol 3, 6.3 Appendix 9-1: Ecological Baseline Report [APP-198] specifies that modified grassland habitat, either grazed by cattle or sheep or in grass silage production, accounts for 75.18 ha and 9.53% of the total extent of land at the Solar PV Sites and that although small areas of modified grassland are present at Lime Down Sites A, B, C and D, this habitat was mostly prevalent at Lime Down Site E. 9.38. In terms of the CRC, paragraph 3.2.26 of ES Vol 3, 6.3 Appendix 9-1: Ecological Baseline Report [APP-198] details that livestock grazing is frequent throughout and that over 25% of the land area (approximately 117.15 ha) within the CRC is classified as modified grassland. Paragraph 3.2.27 recognises that modified grassland, particularly cattle-grazed pasture, does provide suitable foraging habitat for a range of species but evaluates the habitats as being of Site Importance.	The Applicant notes the Council's comment.

WC-089	Ecology and Biodiversity	Ecological Baseline	Other Neutral Grassland – Solar PV Sites and CRC 9.39. Paragraphs 3.2.29 to 3.2.44 of ES Vol 3, 6.3 Appendix 9-1: Ecological Baseline Report [APP-198] provides details of the other neutral grassland habitat within the Solar PV Sites and describes specific areas of this habitat in Fields E12, E18, E26 and C29. However, none are assessed to qualify as HPI / priority habitat. 9.40. In respect of the CRC, paragraph 3.2.45 of ES Vol 3, 6.3 Appendix 9-1: Ecological Baseline Report [APP-198] specifies that there is over 15.44 ha of other neutral grassland which equates to 3.34% of the CRC. It then goes on to state: "*The vast majority of other neutral grassland was considered to represent a good example of this habitat type and was diverse in botanical species composition*." Nonetheless, there is no further detail provided regarding the species composition of the other neutral grassland within the CRC or discussion in terms of whether any of the areas could qualify as HPI / priority. 9.41. Paragraph 3.2.46 of ES Vol 3, 6.3 Appendix 9-1: Ecological Baseline Report [APP-198] states: "*When combined as a whole, the other neutral grassland is of moderate botanical interest and likely to support a diverse range of wildlife, more so than other agricultural land across the Order Limits. Overall, this habitat is considered to be of Local Importance*." 9.42. The council considers that the omission of further detail and analysis of the other neutral grassland habitat	The Applicant notes the Council's comment. With respect to the CRC, the Applicant can confirm that no area of other neutral grassland habitat within the CRC constituted HPI / priority habitat. Any such habitats would have been recorded as such and mapped accordingly. The text in **Appendix 9-1 [APP-198]** will be updated with further details at and confirmation that no grassland within the CRC comprised HPI / priority habitat, and the revised version will be submitted at Deadline 1.

			within the CRC and whether any areas of this habitat could constitute HPI / priority habitat must be addressed to enable a suitably informed and robust assessment of the whole Scheme. Therefore, at present the council cannot corroborate the evaluation of this habitat type across the entire Order Limits as being of local importance.	
WC-090	Ecology and Biodiversity	Ecological Baseline	9.43. Furthermore, there are areas within the CRC that are mapped on the Baseline Habitats Maps for the CRC (Figures 9.1.13 – 9.1.24) as "*Habitat Assumed*", and presumably these are the areas not yet accessed for the purposes of survey. It is noted that there are "*Habitat Assumed*" areas within the CRC that are also mapped as "*Other neutral grassland*". It is important that such areas are subject to survey and the habitat and botanical composition and diversity determined before approval is granted for the DCO because if such other grassland areas are species-rich, it is possible that some areas of assumed other neutral grassland within the CRC could in fact qualify as HPI / priority habitat. It is therefore recommended that the Examining Authority reviews this with caution as evidently the DCO	The Applicant notes this comment and confirms that areas mapped as 'other neutral grassland' as well as 'Habitat Assumed' within Figures 9.1.13 - 9.1.24 had not been surveyed at the time of preparation of the figures and **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**. These areas were assigned habitat types based on a review of satellite imagery, a desk study analysis and in the context of other habitats within the local area which had been surveyed at that point in time, as described in paragraph 9.7.18 of **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**. Taking these considerations into account, these areas were mapped as 'other neutral grassland', being the highest value habitat likely to be present on a precautionary basis.

			application lacked adequate ecological baseline information and data for the CRC at the point of submission. Given that the 40 Applicant has indicated the intention to rely on the Rochdale Envelope approach and in light of the parameters specified within the DCO submission documentation for use of this approach, it is suggested that in the interim period, whilst surveys are pending or in the event that the DCO determination needs to proceed, areas mapped as both "*Other neutral grassland*" and "*Habitat Assumed*" should be assumed to comprise grassland HPI / priority habitat as it is necessary to apply the precautionary principle.	The Applicant confirms that all such areas have now been subject to survey. The survey methodology applied was consistent with that reported in the ES for the rest of the Cable Route Corridor. The Applicant can confirm that none of the areas were considered to represent HPI / Priority Habitat. Some habitat types were reassigned from the assumed habitat 'other neutral grassland' and in most cases were catergorised as either arable land or 'modified grassland' both of which are habitat types of generally lower intrinsic value to biodiversity. The Applicant has updated **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]** (and relevant appendices) with the findings of these surveys and the revised version will be submitted at Deadline 1. However, it is considered these do not materially change the assessment of likely significant effects presented**.**

WC-091	Ecology and Biodiversity	Ecological Baseline	Ponds – Solar PV Sites and CRC 9.44. The evaluation of the ponds within the solar PV sites and CRC presented in paragraph 3.2.77 of ES Vol 3, 6.3 Appendix 9-1: Ecological Baseline Report [APP-198] appraises this habitat as being of Local Importance. The evaluation does not specify that the ponds within the Order Limits likely qualify as HPI / priority habitat, despite the fact that in the legends of the Baseline Habitats Maps (Figures 9.1.8 – 9.1.12 and Figures 9.1.13 – 9.1.24) in ES, Vol 2, ponds are described as "*Ponds (priority habitat)*".	The Applicant notes the council's comment. All ponds within the Order Limits have been assumed to represent HPI / priority habitat on a precautionary basis given the likely presence of toads and other amphibians. The rationale for this is set out in Table 9-7 of **ES Volume 1, Chapter 9 Ecology and Biodiversity [APP-061]** although it is acknowledged that it would be helpful to also set this out within **ES Volume 3, Appendix 9-1: Ecological Baseline Report [APP-198]** and this has been updated accordingly and will be submitted at Deadline 1.
WC-092	Ecology and Biodiversity	Ecological Baseline	Hedgerows – Solar PV Sites and CRC 9.45. Paragraph 3.2.88 of ES Vol 3, 6.3 Appendix 9-1: Ecological Baseline Report [APP-198] stipulates that over 84km of hedgerow exists across the Solar PV Sites, over 66km of which were categorised as species-rich and a large proportion contained occasional semi-mature to mature trees. Paragraph 3.2.91 explains that the majority of hedgerows within the CRC are species-rich and form a network of connective linear features within the landscape. As such, the ecological importance of the hedgerow network and the fact that in general hedgerows comprise a HPI / priority habitat, is recognised in the evaluation presented in paragraph 3.2.93 of APP-198 which assesses the habitat as District Importance. However, the evaluation omits discussion regarding the extent of hedgerow that meets the criteria of	The Applicant notes the Council's comment. An explicit discussion on the extent to which 'important hedgerows' (as defined under the Hedgerow Regulations 1997) will be impacted by the Scheme was not included within the ecological assessment contained within **ES Volume 1, Chapter 9 Ecology and Biodiversity [APP-061]**. This is in part because the 'importance' or otherwise of hedgerows in the context of the Hedgerow Regulations 1997 is not solely based on their ecological value, but also on account of landscape and heritage considerations. All important hedgerows are mapped and shown on the **TPO and Hedgerow Plan [APP-011]**. The assessment of hedgerows within **ES Volume 1, Chapter 9 Ecology and Biodiversity [APP-061]** was instead based on their intrinsic value to biodiversity (such as

			"*important hedgerows*" under the Hedgerow Regulations 1997, and this point was previously raised in the council's statutory consultation response. Although it is noted that the legends to the Baseline Habitats Maps (Figures 9.1.8 – 9.1.12 and Figures 9.1.13 – 9.1.24) do list out various categories of native species-rich hedgerows.	their value as wildlife corridors and shelter/foraging resources for a range of protected / notable species). This is in line with the evaluation of all other habitat types present within the Order Limits and in accordance with the methodology described for the evaluation of Ecological Importance in paragraphs 9.6.19 to 9.6.22 of **ES Volume 1, Chapter 9 Ecology and Biodiversity [APP-061]**. Nevertheless, the text in **ES Volume 1, Chapter 9 Ecology and Biodiversity [APP-061]** has been updated to provide further information relating to the extent of important hedgerows, and will be submitted at Deadline 1.
WC-093	Ecology and Biodiversity	Ecological Baseline	Protected and Notable Species Badger 9.46. It is apparent that 25 badger setts of varying status and levels of activity have been recorded within Lime Down Sites A-E, along with a number of field signs. A total of eight badger setts have been identified within the Cable Route Corridor, including two main setts.	The Applicant notes this comment on the findings relating to badger setts.

WC-094	Ecology and Biodiversity	Ecological Baseline	Bats Roosting Bats – Solar PV Sites and CRC 9.47. Whilst it is recognised that paragraph 3.3.15 of ES Vol 3, 6.3 Appendix 9-1: Ecological Baseline Report [APP-198] lists bat roost records within 2km of the CRC that have been obtained via a desk study, it would be prudent for the Bechstein's bat core maternity roosts to the south of Chippenham regarding which the council's ecology team provided a Technical Briefing Note, to be also included in paragraph 3.3.15 as these are located within 2km of the CRC. 9.48. It is evident that buildings within the Solar PV Sites were subject to inspection for roosting bats and potential roosting features (PRFs) but were not subject to further detailed surveys to establish the presence or likely absence of roosts within the buildings has been undertaken. The rationale provided is that all buildings are expected to be retained and unaffected by the Proposed Development. In the council's statutory consultation response, it was specified that although buildings are likely to be retained within the Scheme layout, there could be indirect disturbance to any bats using the buildings as roost sites during the construction phase and that as such, further survey of buildings with identified PRFs would have served to inform the layout of the Scheme in terms of ascertaining where infrastructure, BESS sites, compounds and so forth should be sited to minimise	The Applicant notes the Council's comments. The precise location of the Bechstein's bat core maternity roosts south of Chippenham have not been disclosed to the Applicant, although the approximate location was provided and this has been noted in paragraph 9.7.15 of **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]** and in paragraph 1.3.8 of **ES Volume 3, Appendix 9-3: Bat Survey Report [APP-200]**. The ecological assessment undertaken within **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]** has fully considered the presence of these roosts and their location relative to the Order Limits. The Applicant agreed with the Council's previous statutory consultation comments that the roosting bat assemblage was potentially undervalued within the PEIR, particularly given the high number of trees within the Order Limits with potential to support roosting bats. As such the evaluation of roosting bats was reassessed and an increased valuation of District Importance was considered appropriate within **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]** applying the precautionary principle. This was based on professional judgement with consideration to the likely assemblage of bats present (as determined through the described desk study and field surveys) and the opportunities identified for meeting seasonal roosting needs (for instance breeding, mating,

			the potential for impacts on bats. 9.49. Wiltshire Council's statutory consultation response also specified that given that there are a large number of trees and a small number of buildings that afford potential to support roosting bats within the Order Limits, and that specific survey to ascertain the presence or likely absence of bat roosts has not taken place, it is unclear how a sound conclusion had been reached regarding the ecological value of the roosting bat assemblage which had been assessed as being of Local Importance in the PEIR. The council indicated that the assessment had potentially undervalued roosting bats in terms of the Solar PV Sites and as further survey of the trees with PRFs and buildings with bat roosting suitability was not undertaken, the precautionary principle should be applied. It is acknowledged that the roosting bat assemblage likely present within the Order Limits has been reviewed and reassessed as District Importance within the ES. 9.50. The council notes that further targeted survey of the buildings within both the Solar PV Sites and the CRC has not been undertaken in 2025. The council would like to highlight the value this additional survey could have provided for the ES and HRA given the large scale of the Solar PV Sites and potential for adverse effects on bats.	hibernating and feeding). The Applicant notes the Council's comments on the absence of further targeted surveys undertaken of buildings within the Order Limits. A comprehensive assessment of potential impacts on roosting bats potentially using the buildings has been made within **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**. Paragraphs 9.10.170 to 9.10.180 describe how all buildings will be retained and protected from impacts throughout all phases of the Scheme, and it remains the Applicant's view that no significant impacts will occur should any bats be roosting within the buildings, as buildings, as per the conclusions of the assessment. As such further survey to determine the presence or likely absence of bats using the buildings is considered to be unnecessary.

WC-095	Ecology and Biodiversity	Ecological Baseline	Foraging / Commuting Bats – Solar PV Sites 9.51. The council's statutory consultation response recommended that manual transect surveys be undertaken in likely areas of key bat habitat within the Solar PV Sites to augment the static detector surveys. It is evident that this has not been undertaken. An expanded rationale setting out why manual transect surveys are not deemed necessary and haven't been undertaken, despite Bat Conservation Trust (BCT) survey guidelines, has instead been provided.	The Applicant notes this comment. The rationale for not undertaking manual transect surveys is set out in paragraphs 1.2.16 to 1.2.19 of **ES Volume 3, Appendix 9-3: Bat Survey Report [APP-200]**. It is noted that this approach was agreed with Natural England in July 2024.
WC-096	Ecology and Biodiversity	Ecological Baseline	Foraging / Commuting Bats – Cable Route Corridor 9.52. There has been no bat activity survey undertaken within the CRC and the assumption has been made that habitats within the CRC are likely of similar value for bats as those at the Solar PV Sites, and that a similar assemblage of bat species are likely supported. The rationale provided for why no survey has been conducted is that habitats within the CRC are anticipated to be predominantly retained, with any temporary removal of habitat for access and cable installation works expected to be reinstated following a relatively short construction period and that as such, undertaking specific bat activity surveys was not considered proportionate or necessary. 9.53. The council raised concern regarding the lack of bat activity survey within the CRC within its previous statutory consultation response. Whilst it is acknowledged that it would have	The Applicant maintains that, due to the short-term and temporary and temporary nature of works within the CRC, the relatively localised construction footprint (i.e. 25m typical width of the cable works plus temporary construction compounds) and the absence of permanent operational effects, an adequate assessment of impacts on foraging / commuting bats has been made based on the appraisal of habitats undertaken. It is the Applicants view that potential impacts within the CRC, including temporary habitat loss, disturbance and fragmentation, have been assessed on a precautionary and reasonable worst-case basis, and that the mitigation measures to be secured as part of DCO requirements are appropriate for ensuring no significant residual adverse impacts will occur in line with the conclusions of **ES Volume 1, Chapter 9 Ecology and Biodiversity [APP-061]**.

			been potentially unfeasible and possibly unnecessary to undertake bat activity surveys across the entire CRC, the council expected some survey to have been undertaken in specific locations where impacts are likely to be greatest, such as in the vicinity of the proposed temporary construction compound locations and the wider section of the CRC where it coincides with the Bath and Bradford-on-Avon Bats SAC greater horseshoe bat consultation zone and lies close to two Bechstein's bat core areas, especially in areas of cattle-grazed pasture. 9.54. Therefore, it is considered that there should have been some bat activity survey conducted within the CRC to facilitate the impact assessment and HRA and to inform the formulation of adequate and appropriate avoidance and mitigation measures. The rationale provided as to why no survey has been undertaken at any location within the CRC, despite the potential for impacts on Annex II bats associated with the Bath and Bradford-on-Avon Bats SAC, is not deemed to be wholly sound or sufficiently precautionary particularly. Furthermore, it is assumed that there had been opportunity to carry out survey in 2025 subsequent to the statutory consultation. 9.55. In terms of the Bechstein's bat core maternity roosts near Lackham, south of Chippenham, which have been assumed to be functionally and demographically linked to the Bath and Bradford-on-Avon Bats SAC, as	The Applicant welcomes the Council's corroboration of the approach set out in paragraph 1.3.24 of **ES Appendix 9-3 [APP-200]**.

			aforementioned, the council corroborates the precautionary approach set out in paragraph 1.3.24 of the ES Vol 3, 6.3 Appendix 9-3 Bat Survey Report [APP-200].	
WC-097	Ecology and Biodiversity	Ecological Baseline	Otter and Water Vole – Solar PV Sites and CRC 9.56. The council's statutory consultation response highlighted that species-specific otter and water vole survey had not been undertaken within the CRC. It is apparent from the DCO application documentation, that species-specific survey has still not been conducted within the CRC. It is deemed that this is inadequate and that a suitably robust rationale for the lack of these surveys has not been provided. This is particularly pertinent given that the Applicant has opted to rely on the Rochdale Envelope approach. 9.57. The council's statutory consultation response suggested that the importance of the otter and water population within the Order Limits had been under-estimated in the PEIR. It is recognised that these comments have been taken on board and that both these species have been re-evaluated as being of District Importance within the DCO application documentation.	The Applicant notes the Council's comments relating to the lack of species-specific surveys for otters and water voles within the CRC. The Applicant considers that a precautionary and reasonable worst-case scenario has been assumed for the assessment of impacts within **ES Volume 1, Chapter 9 Ecology and Biodiversity [APP-061]**, whereby both species have been assumed to be present in all suitable habitat, based on a comprehensive habitat appraisal. It is the Applicant's view that proposed embedded mitigation (such as adoption of trenchless technologies to avoiding impacting watercourses) or additional mitigation in the form of pre-construction surveys, micro-siting of works within the cable route corridor etc. to be secured by the **Outline EPMS [APP-284]**, are entirely adequate for ensuring no significant residual impacts would occur in line with the conclusions of the assessment provided in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061].**

WC-098	Ecology and Biodiversity	Ecological Baseline	9.61. Nevertheless, the Examining Authority should be aware of a very important point, which is that to use the GCN DLL Scheme, the Applicant will need to have obtained an impact assessment and conservation payment certificate (an IACPC) from Natural England, and that this should have been submitted with the DCO application just as is the expectation for planning applications. It is not apparent whether the Applicant has obtained an IACPC yet as it has not been submitted with the DCO application in lieu of a GCN mitigation strategy for the extensive CRC. Chapter 9 specifies that there is intention to apply to use the DLL but it does not appear to stipulate that an application has been submitted to date.	The Applicant confirms that an IACPC countersigned by Natural England has been obtained and will be submitted at Deadline 1.

WC-099	Ecology and Biodiversity	Ecological Baseline	Great Crested Newt – Solar PV Sites and CRC 9.58. In respect of the Solar PV Sites, environmental DNA (eDNA) surveys have identified presence of great crested newts (GCN) in two ponds within Lime Down Sites C and E. GCN have also been recorded within a further 14 ponds located within 250 m of the Solar PV Sites. Paragraph 3.3.57 of ES Vol 3, 6.3 Appendix 9-1: Ecological Baseline Report [APP-198] states: "*It has not been possible to survey a further 41 ponds which lie beyond the Solar PV Sites but within the surrounding 250 m due to a lack of access permission*." 9.59. In terms of the CRC, paragraph 3.3.59 of ES Vol 3, 6.3 Appendix 9-1: Ecological Baseline Report [APP-198] stipulates: "*During the desk-based assessment, approximately 130 waterbodies were identified within the Cable Route Corridor and surrounding 250 m. District Level Licensing will be utilised for works within the Cable Route Corridor, which assumes the presence of GCN within local waterbodies and stipulates mitigation and compensation measures to reduce and offset impacts on this species. As such no surveys to determine the presence or likely absence of GCN have been undertaken for ponds within the Cable Route Corridor*." 9.60. Confirmation that the Applicant intends to use Natural England's GCN District Level Licensing Scheme (DLL) in respect of the CRC is acknowledged and this clarification is welcomed as it	The Applicant notes the Council's comments. Works within the Cable Route Corridor will be registered under Natural England's District Level Licensing Scheme.

			had not been provided within the PEIR as such, the council's statutory consultation response had queried this point.	
WC-100	Ecology and Biodiversity	Ecological Baseline	9.62. The fact that the DCO application lacks the necessary IACPC is important and pertinent to the Examining Authority's review of the DCO application, because if Natural England does not grant the IACPC, the Applicant would need to conduct pond survey and depending on the survey results, would likely need to formulate a bespoke mitigation strategy and apply for a mitigation licence from Natural England. Details of a bespoke GCN mitigation strategy, where required, would need to be scrutinised by the Examining Authority prior to the DCO application being granted approval. The acquisition of the IACPC and provision of the certificate gives the decision-making authority certainty that	The Applicant confirms that an IACPC countersigned by Natural England has been obtained and has been submitted as evidence of the Schemes acceptance into the District Level Licensing Scheme

			adequate and appropriate mitigation and compensation is deliverable and has been secured in principle.	
WC-101	Ecology and Biodiversity	Ecological Baseline	9.63. The Examining Authority should also be aware that upon receipt of the IACPC, they will need to check that the certificate has been signed for, and on behalf of Natural England; that the site details and boundaries of the IACPC are the same as on the DCO application; and that the countersigned IACPC confirms that the development: is suitable for DLL; meets the 'favourable conservation status' (FCS) test in the Habitats Regulations 2019; and will compensate for any impacts on GCN by a conservation payment. As with all applications, the Examining Authority will also need to consider if the development meets the 'no satisfactory alternative' test and 'imperative reasons of overriding public interest' (IROPI) test. 9.64. GCN are European Protected Species (EPS) and the Solar PV Sites and the Cable Route Corridor cover a very large area. Signaling the intention to use the DLL does not in itself provide evidence that sufficient and adequate mitigation and compensation will be implemented. In the absence of an IACPC from Natural England, there cannot be certainty of delivery of compensation for loss of and impacts to	The Applicant confirms that an IACPC countersigned by Natural England has been obtained and has been submitted as evidence of the Schemes acceptance into the District Level Licensing Scheme. The IACPC contains an 'Impacts Plan' corresponding with the Cable Route Corridor elements of the Order Limits.

			GCN habitat and clearly such assurance would be needed prior to the approval of a Scheme of this scale. Moreover, the precautionary principle should be adhered to in respect of this matter, particularly in light of the Applicant opting to rely on the Rochdale Envelope approach. 9.65. At the PEIR stage, the council commented that given the amount of outstanding survey and gaps in the ecological baseline information in respect of GCN, a suitably informed and comprehensive mitigation strategy had not been formulated for the species, and as such comments could not be provided regarding whether proposed mitigation and compensation at the site is adequate and likely to be effective. This issue has not been entirely overcome within the DCO application.	
WC-102	Ecology and Biodiversity	Ecological Baseline	Breeding Birds - Solar PV Sites and CRC 9.66. In regard to the solar PV sites, paragraph 3.3.69 of APP-198 specifies: "*Barn owl Tyto alba were recorded as possibly breeding at each of Lime Down A-E, with suitable buildings and / or mature trees with cavities present*." Evidence of possible breeding barn owl within the solar PV sites is also presented in the Target Notes in Annex A of APP-198. Given this evidence, the council would have expected species-specific survey for this important Schedule 1 species to have at least been carried out at the buildings within the Solar PV Sites.	The Applicant notes the Council's comments within regards to barn owl and the absence of specific for this species at buildings within the Solar PV Sites. The Applicant notes that all buildings within the Order Limits will be retained and protected from development with no direct impacts. Pre-construction inspections for barn owls of any buildings within the Order Limits which may be subject to indirect impacts (such as noise disturbance) will be undertaken as secured within section 5.3 of the **Outline EPMS [APP-284]**. As set out in section 5.3 of the Outline EPMS, this will identify potential requirements for altering works (for instance to delay works until nesting is

			9.67. APP-198 specifies that the Solar PV Sites as a whole offer suitable habitat for a variety of breeding birds. It is apparent, however, that no breeding bird surveys have been undertaken within the CRC. The rationale put forward is as follows: *"Habitats within the Cable Route Corridor are anticipated to be predominantly retained, with any temporary removal of habitat for access and cable installation works expected to be reinstated following a relatively short construction period. As such, undertaking specific breeding bird surveys was not considered proportionate or necessary."* 9.68. Given the extent of the CRC, the construction duration and construction methods to be employed, together with the deployment of temporary construction compounds throughout the CRC and the fact that the construction footprint will be up to approximately 665m wide at some locations along the route, in order to be suitably precautionary and to ensure the collation of adequately comprehensive and robust ecological baseline data, the council would have expected breeding bird survey to have at least been undertaken at likely key habitats within the CRC. The justification for the lack of survey is not deemed to be sufficiently strong and appears to be predicated on the assumed temporary nature of construction phase related impacts. It is considered that this fails to fully recognise the potential for disturbance and displacement of birds during the	complete) to avoid impacts and ensure legal compliance. The Applicant considers that a precautionary and reasonable worst-case scenario has been assumed for the assessment of impacts for breeding birds pertaining to the CRC within **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**, given the short-term and temporary nature of the works associated with this element of the Scheme. The Applicant clarifies that there is no location within the CRC where the 'construction footprint' will be approximately 665m as stated in the Council's response and the assessment of impacts has not been undertaken on this assumption. As stated in paragraph 3.3.52 of **ES Chapter 3: The Scheme [APP-055]** 665m is the maximum width of the Cable Route Corridor within which the cabling construction works footprint (typically 25 m wide) will occur, which will be determined at the detailed design stage. The width of the Cable Route Corridor is up to 665m wide in places to retain necessary flexibility over the final locations of cabling works. The evaluation of the breeding bird assemblage with respect to the CRC was based on professional judgement with consideration to the likely assemblage of birds given the findings of the desk study and detailed surveys conducted at the Solar PV Sites, and the recorded habitats present (particularly the similarity of habitats within the both the CRC and the Solar

			breeding season. 9.69. The breeding bird assemblage at the Solar PV Sites and the CRC has been assessed as being of District importance. This has obviously been concluded without any breeding bird survey data having been collated for the CRC and the Examining Authority should take this into account.	PV Sites). It is the Applicant's view that a suitably precautionary approach to the evaluation of the breeding bird assemblage within the Order Limits has been made.

WC-103	Ecology and Biodiversity	Ecological Baseline	Overwintering Birds - Solar PV Sites and CRC 9.70. In respect of the Solar PV Sites, APP-198 details that wintering bird surveys have recorded a diverse assemblage of birds, including a moderate diversity of 36 Species of Conservation Concern (SoCC). It is evident that no wintering bird surveys have been undertaken within the CRC. Instead, the analysis presented in the DCO application assumes that the habitats within the CRC are of similar value for overwintering birds as those at the Solar PV Sites and that therefore a similar assemblage of overwintering birds are likely supported. Taking this approach could omit the recording of further and / or different protected and notable wintering bird species and is not supported by the council.	The evaluation of the overwintering bird assemblage with respect to the CRC was based on professional judgement with consideration to the likely assemblage of birds given the findings of the desk study and detailed surveys conducted at the Solar PV Sites, and the recorded habitats present (particularly the similarity of habitats within the both the CRC and the Solar PV Sites). It is the Applicant's view that a suitably precautionary approach to the evaluation of the overwintering bird assemblage within the Order Limits has been made.

WC-104	Ecology and Biodiversity	Ecological Baseline	White-Clawed Crayfish – Solar PV Sites and CRC 9.71. There has been no specific survey undertaken for white-clawed crayfish within either the Solar PV Sites or the CRC. This is despite suitable habitat for white-clawed crayfish being present in the form of Gauze Brook and Gabriel's Well watercourses in Lime Down Sites D and E, as well as a small number of wet ditches directly connected to these watercourses. The species is therefore assumed to be present within all suitable habitat, however, it is noted that paragraph 3.3.97 of APP-198 incorrectly refers to dormice within this context rather than white-clawed crayfish. 9.72. In the council's statutory consultation response, it was suggested that given that white-clawed crayfish are assumed to be present, assigning an ecological importance of greater than 'Local (assumed)' should be considered because the species is in decline and under threat. It is noted that this evaluation has been reviewed and reassessed in the DCO application and that populations of white-clawed crayfish within the Order Limits are now considered to be of District Importance. This re-evaluation is welcomed and the council concurs with the valuation in the absence of dedicated survey having been conducted.	The Applicant notes the Council's comment highlighting the error at paragraph 3.3.97 of **ES Volume 3, Appendix 9-1: Ecological Baseline Report [APP-198]**. The text at this location has been corrected and a revised version will be submitted at Deadline 1. The Applicant welcomes the Council's agreement of the evaluation ascribed to white-clawed crayfish.

WC-105	Ecology and Biodiversity	Embedded Mitigation	Buffer Zones 9.73. The proposal to implement buffers from field boundary habitats and other ecological features is welcomed. ES Vol 1, 6.1 Chapter 9: Ecology and Biodiversity [APP-061] specifies that buffers will not contain any array structures, hard standing or electrical hardware. 9.74. As discussed earlier, however, ES Vol 1, 6.1 Chapter 3: The Scheme [APP-054] states that within the CRC, where practicable, cable routing would be to the edge of fields to minimise impacts. As aforementioned, it assumed that buffer zones will also be implemented in the CRC. If so, the council considers that the approach to the cable routing works detailed in APP-054 would constitute unacceptable works within buffer zones to important field boundary habitats, including hedgerows and trees and will conflict with the Applicant's own proposed avoidance and mitigation measures as set out in Chapter 9 of the ES.	The reference in **ES Volume 1, Chapter 3: The Scheme [APP-054]** to routing cables towards the edge of fields reflects an indicative design principle intended to reduce land take and disruption to agricultural operations where practicable. It does not override or negate the embedded mitigation measures set out elsewhere within the Environmental Statement. Within the CRC, the ecological buffers described in **ES Volume 1, Chapter 9 Ecology and Biodiversity [APP-061]** will be implemented where practicable, informed by detailed design and local site conditions. Notwithstanding this, all tree and hedgerow Root Protection Areas (RPAs) will be respected, and works will be designed to avoid encroachment into RPAs in accordance with best practice arboricultural guidance. Hedgerows, hedgerow trees and associated field boundary habitats are therefore afforded protection irrespective of the final cable alignment. Where routing adjacent to field boundaries is proposed, this will be subject to detailed assessment at the construction stage to ensure that unacceptable ecological or arboricultural effects are avoided. This will be secured through the **Outline EPMS [APP-284]** and **Outline Arboricultural Method Statement [APP-206]**, which will define working methods, exclusion zones and protection measures as appropriate. A risk-based approach to micrositing of

				the final cable route will take into account the presence of priority habitats and habitat of suitability for various protected species and species of conservation concern. Accordingly, the Applicant does not agree that routing cables towards field edges inherently increases ecological impacts, nor that there is a conflict between **ES Volume 1, Chapter 2: The Order Limits [APP-054]** and **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**. The final alignment within the CRC will be determined through detailed design, applying the mitigation hierarchy and ensuring protection of sensitive ecological and arboricultural features.
WC-106	Ecology and Biodiversity Description and DCO Process	Embedded Mitigation	Site Accesses 9.75. In terms of site access, paragraph 3.3.65 of ES Vol 1, 6.1 Chapter 3: The Scheme [APP-055] states: "*Wherever practicable, existing field accesses will be utilised for access to the Order Limits. If a suitable field access does not exist, for example due to poor highway visibility, new accesses would be constructed. Accesses would be designed to ensure there are no impacts on veteran or protected trees as a result of vehicle movements, however, there may be localised*	The Applicant welcomes the Council's support for the intention to utilise existing field accesses wherever practicable, as outlined in **ES Volume 1, Chapter 3: The Scheme [APP-055]**.

			removal of sections of hedgerows as required, e.g. for visibility splays." The council supports the intention to utilise existing accesses as far as practicable.	
WC-107	Ecology and Biodiversity	Embedded Mitigation	Temporary Construction Compounds 9.76. Given that the CRC intersects a 4km greater horseshoe bat SAC consultation zone associated with the Box Mine component of the Bath and Bradford-on-Avon Bats SAC, the Scheme proposals indicate that there will be no Temporary Construction Compounds sited within this area. The implementation of this approach is corroborated by the council.	The Applicant welcomes the Council's corroboration on the approach to avoid siting Temporary Construction Compounds within the consultation zone.

WC-108	Ecology and Biodiversity	Additional Mitigation	9.77. ES Vol 1, 6.1 Chapter 9: Ecology and Biodiversity [APP-061] details construction phase additional mitigation measures for ground nesting birds of open farmland. Paragraphs 9.12.31 - 9.12.32 states: "*Skylark and yellow wagtail have overlapping nesting requirements, and so skylarks have been used as an umbrella species for this assessment. Of the 164 skylark territories recorded at baseline, 33 are retained in undeveloped fields, leaving 131 likely to be displaced…The first way in which the impact of displacement on skylark (and yellow wagtail) will be reduced is through the large-scale creation of optimal foraging habitat in the form of diverse grassland types under / between Solar PV Panels and within buffer zones*." 9.78. Whilst the intention to deliver large-scale optimal foraging habitat in the form of diverse grassland types under / between the Solar PV Panels is admirable, it must be noted that the council set out in its statutory consultation response to the PEIR, that it should be assumed that only modified grassland can be achieved underneath and between the solar panels. Although this comment pertained to Biodiversity Net Gain (BNG) projections and calculations, for the purposes of consistency, the whole of the ES and DCO application documentation should likewise assume that only modified grassland will be achievable under and between the solar panels. 9.79. The need to assume only modified grassland can be achieved	The Applicant notes the Council's comments and it is agreed that, taking a precautionary approach, grassland expected to establish within and beneath panels has been assumed to represent modified grassland and a consistent approach has been taken between the **Biodiversity Net Gain Report [APP-273]** and **ES Volume 1, Chapter 9 Ecology and Biodiversity [APP-061]** in this respect. However, it is the Applicant's view that modified grassland can provide valuable foraging habitat for skylarks, particularly in comparison to arable cropland under intensive management which currently comprises the majority of the Solar PV Sites. Once established, the grassland will be subject to a low-intensity management regime during the operation and maintenance phase as secured via the **Outline LEMP [APP-283]** which will be expected to provide a year-round supply of foraging resources (such as seeds, plant and invertebrates) as opposed to the seasonal opportunities associated with arable cropping regimes. Furthermore, skylarks (and particularly chicks) are heavily dependent on insects and spiders during the summer months. As specified with the **Outline LEMP [APP-283]** use of pesticides will be avoided at the operational scheme. The current arable habitats across the Solar PV Sites are likely to be subject to regular pesticide application, and the cessation of this as a result of the Scheme can be

			under and between the solar panels is correctly recognised in the Biodiversity Net Gain Assessment Report (APP-273) and so it is not clear why there hasn't been consistency of approach within ES Vol 1, 6.1 Chapter 9: Ecology and Biodiversity [APP-061]. In addition, the council is concerned that assumption of delivery of the additional mitigation for breeding birds proposed in Paragraphs 9.12.31 - 9.12.32 will have skewed the impact assessment, conferring greater assumed benefits than will likely be delivered on the ground. 9.80. Therefore, the council does not have confidence that the purported additional mitigation for breeding birds in the form of diverse grassland types under and between the solar panels will be deliverable and the Examining Authority is advised to review with caution and to apply the precautionary principle. The requirements to be fulfilled when relying on the Rochdale Envelope approach to assessment should also be recognised in this context.	expected to increase invertebrate prey abundance and diversity. Grassland habitats expected to establish within buffer zones are likely to provide even greater foraging resources for skylarks than typical existing habitats. Overall, the Applicant considers that the value of the habitat under / between Solar PV Panels and in buffer zones is highly likely to represent better quality foraging habitat for skylarks than the existing arable fields. The Applicant therefore considers the additional mitigation proposed in paragraphs 9.12.31 and 9.12.32 of **[APP-061]** to be deliverable. Skylarks have been observed gathering food from within operational solar farms and leading young into them, indicating they are valuable foraging resources. Whilst it is assumed that skylarks will typically avoid nesting in solar farms, skylark foraging habitat requirements are less strict.
WC-109	Ecology and Biodiversity	Additional Mitigation	9.81. ES Vol 1, 6.1 Chapter 9: Ecology and Biodiversity [APP-061] also proposes additional mitigation for breeding birds in paragraphs 9.12.34 – 9.12.36. This will entail removing a number of fields from hosting infrastructure for the Scheme and managing them sensitively as set out within the Outline LEMP to provide improved nesting habitat for these species. The fields will either be managed as permanent grassland with	The Applicant notes this comment

			a late season hay-cut (to avoid disturbance to birds during the breeding season) or as set-aside. APP-061 indicates that this will enhance the carrying capacity of the fields and that it is calculated that a total of 26.6 territories would be mitigated in this way.	
WC-110	Ecology and Biodiversity	Additional Mitigation	9.82. The council welcomes these additional mitigation proposals which accord with the recommendations set out in the council's statutory consultation response.	The Applicant welcomes the Council's support on the additional mitigation measures presented within **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**.
WC-111	Ecology and Biodiversity Noise and Vibration	Assessment of Impacts	Noise 9.83. The council's statutory consultation response to the PEIR highlighted the need for the noise generating elements of the Scheme proposals, including during the operational phase, to be assessed in relation to the relevant ecological receptors; notably noise sensitive / averse protected and notable species. It is recognised that ES Vol 1, 6.1 Chapter 9: Ecology and Biodiversity [APP-061] has followed this advice.	The Applicant welcomes the Council's support on the addition of noise generating elements to the assessment presented within **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**.

WC-112	Ecology and Biodiversity	Solar Panel Cleaning and Maintenance	Solar Panel Cleaning and Maintenance 9.84. Within its statutory consultation response, the council highlighted the need for the ES to assess the potential for the cleaning and maintenance of the panels to result in adverse effects to ecological receptors, particularly the habitats and ground flora within the Solar PV Sites. The response also highlighted that the potential adverse effects associated with the operational activities should be reflected in projections in respect of BNG. 9.85. The cleaning of solar panels is discussed in paragraphs 3.5.26 - 3.5.28 of ES Vol 1, 6.1 Chapter 3: The Scheme [APP-055] and it is stated that for the purposes of the assessments in the ES, an annual cleaning cycle is assumed. The suggested likely cleaning frequency set out in APP-055 doesn't align with that suggested in ES Vol 1, 6.1 Chapter 9: Ecology and Biodiversity [APP-061] as paragraph 9.10.178 specifies that the cleaning of the panels, would be infrequent and likely to be no more than every two years. It is therefore requested that this operational activity is reviewed and that Chapter 9 assumes an annual cleaning cycle in the interests of being suitably precautionary. 9.86. In respect of maintenance, ES Vol 1, 6.1 Chapter 3: The Scheme [APP-055] states in paragraph 3.5.10: "*The frequency of maintenance visits would reasonably be expected to be up to five visits per month to any of the Solar PV Sites*." 9.87. The cited frequency of	The Applicant notes this comment. The inconsistency within **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]** is acknowledged. The text in Chapter 9 has been updated to state "*likely to be annually*" in line within **ES Volume 1, Chapter 3: The Scheme [APP-055].** The conclusions in Chapter 9 have been reviewed assuming an annual cleaning cycle, however as this is a is small increase and represents a worst case (some sites can operate without the need to be cleaned), it is considered that this does not change the conclusions presented in Chapter 9. In terms of the comment regarding the frequency of maintenance visits, this has been assessed within Section 9.10 of **ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1].**

			maintenance visits doesn't appear to align with discussion of frequency of operational activity within all the other DCO application documentation, and this level of operational activity doesn't appear to have been assessed within Chapter 9 [APP-061]. It is suggested that this is reviewed.	
WC-113	Ecology and Biodiversity	Habitats Regulations Assessment	9.88. A Habitats Regulations Assessment Report [APP-275] has been submitted in support of the DCO application. This details that a HRA, comprising screening (Test of Likely Significant Effect) and an Appropriate Assessment, has been undertaken for the Scheme. The HRA has concluded that with the adoption of mitigation measures to be secured within the Draft DCO, no adverse effects on site integrity of the Bath and Bradford-on-Avon Bats SAC, Severn Estuary SAC, Severn Estuary Special Protection Area (SPA) or the Severn Estuary Ramsar site are deemed likely, either in isolation or in combination with other projects. 9.89. The HRA has considered mitigation measures to be secured within the Draft DCO for avoiding	The Applicant notes the Council's comments

			identified potential significant effects on the Bath and Bradford-on-Avon Bats SAC as follows: the sensitive siting of Temporary Construction Compounds outside of Core Areas / Impact Zones, the narrowing of construction widths at field boundary habitats within the CRC to avoid fragmentation of habitat, control of lighting, and mitigation for loss of potential bat roost sites to avoid killing / injury to individual bats and ensure no net loss of roost sites. 9.90. The HRA states that to avoid significant effects on the Severn Estuary Ramsar site mitigation measures are to be secured within the Draft DCO include the adoption of trenchless techniques (e.g. HDD) for cable installation crossing watercourses likely to be used by qualifying fish species, and the burial of cables under watercourses to sufficient depths to minimise potential risks of electro-magnetic field (EMF) impacts on sensitive fish species. 9.91. APP-061 and the HRA Report [APP-275] recognise that an approximate 1.5km extent of the CRC passes through a greater horseshoe bat consultation zone that extends 4km from the Box Mine component of the SAC. As such, the area of the bat SAC consultation zone intersected by the CRC is approximately 10.5ha and it is recognised within APP-061 and the HRA that it comprises land that is functionally linked to the SAC with respect of greater horseshoe bats which are a qualifying feature of the SAC.	

WC-114	Ecology and Biodiversity	Habitats Regulations Assessment	9.92. The council remains concerned regarding the total lack of bat survey within the CRC, and that the buildings identified as having potential to support roosting bats within the Solar PV Sites have not been subject to further bat survey. The council is also concerned that approximately 17ha of the CRC remains un-accessed to date and that an apparently as yet unknown extent of hedgerow (including important hedgerow) would be removed through the securing of the Draft DCO as detailed in 3.1 - Draft Development Consent Order [APP-016]. Applying the precautionary principle means that it should be assumed that these gaps in the ecological baseline data and information could have implications for the HRA. Accordingly, the council refrains from providing a view on the conclusions of the HRA at this stage and instead awaits at the very least, the provision of habitat survey information for the currently un-surveyed area of the CRC. 9.93. On the basis that the Examining Authority and / or the Secretary of State effectively comprise the Competent Authority for the DCO application, they should ensure that Natural England is consulted on the HRA and that regard is given to the comments provided by Natural England before a decision is reached. 9.94.The Competent Authority should also be satisfied that they have been provided with as much information as is reasonably required.	The Applicant acknowledges that some areas within the Cable Route Corridor had not been subject to ecological survey at the point of finalising the **Habitat Regulations Assessment Report [APP-275].** Habitat surveys have now been completed across all previously un-surveyed areas. The survey methodology applied was consistent with that reported in the **ES Volume 3, Appendix 9-1: Ecological Baseline Report [APP-198]** for the rest of the Cable Route Corridor The results of these surveys have been reviewed and, in the Applicant's view, do not alter the conclusions of **HRA Report [APP-275]**. A reasonable estimate of calculated permanent and temporary hedgerow removal requirements is set out in **ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]** (e.g. paragraph 9.10.1380) and shown on a plan within the **Outline EPMS [APP-284]**. The Applicant acknowledges the final extent of permanent and temporary hedgerow removal cannot be determined until the detailed design stage. The estimates provided are however considered a reasonable precautionary, and likely worst-case scenario have been used to inform the assessment contained within the **HRA Report [APP-275].** The Applicant has updated **ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]** and **Appendix 9-1 [APP-198]** with the

				findings of these surveys, and it is considered these do not material-y change the assessment of likely significant effects presented in the chapter. The Applicant has consulted Natural England on both the HRA process and the **HRA Report [APP-275]** itself and will continue to consult Natural England on HRA matters during the examination period.

WC-115	Ecology and Biodiversity	Biodiversity Net Gain Assessment	9.95. Paragraph 3.3.80 of ES Vol 1, 6.1 Chapter 3: The Scheme [APP-055] states: *"The enhancements and planting would increase biodiversity and contribute to the Scheme achieving Biodiversity Net Gain (BNG). Further information is provided within ES Volume 1, Chapter 8: Ecology and Biodiversity EN010168/APP/6.1] and ES Volume 1, Chapter 10: Landscape and Visual [EN010168/APP/6.1]".* 9.96. The two ES chapter numbers cited in this extract of APP-055 are incorrect.	The Applicant notes the Council's comments. The text in **ES Volume 1, Chapter 3: The Scheme [APP-055]** has been amended with the correct chapter numbers and a revised version will be submitted at Deadline 1.
WC-116	Ecology and Biodiversity	Biodiversity Net Gain Assessment	9.97. It is acknowledged that BNG is not yet mandatory for NSIPs. It was due to take effect in November 2025 but has been delayed to May 2026 on account of the Government having held an associated consultation, the results of which are currently being reviewed. 9.98. Nevertheless, the DCO application has been accompanied by a BNG Assessment Report [APP-273] and Biodiversity Net Gain Assessment. Appendix Statutory Biodiversity Metric Calculation [APP-274]. 9.99. In line with the advice set out in the council's statutory consultation response (March 2025), APP-273 has projected that only modified grassland of poor condition will be deliverable beneath the solar panels and between the solar panels rows. It also sets out that areas of grassland within the security fencing, but outside of the paneled areas themselves (i.e. in easements (e.g. for existing	The Applicant notes this comment and welcomes the Council's corroboration on the approach to assigning grassland habitat type and condition.

			underground utilities) and margins between the fence line and the panels) have been assigned as modified grassland in good condition for the purposes of the BNG assessment and calculation. The council corroborates this approach as it represents a realistic projection and takes account of the disturbance to, and degradation of ground flora and habitats which may occur during the operational phase as a result of activities including solar panel cleaning, maintenance and replacement.	

WC-117	Ecology and Biodiversity	Biodiversity Net Gain Assessment	9.100. APP-274 has not been submitted in the requisite form which constitutes an unlocked Excel version of the Statutory Biodiversity Metric but instead has been submitted as a pdf document with screenshots of pages from the metric. This is not acceptable and as such, it is requested that the metric is submitted in the correct form. It is noted that PINS has also highlighted this issue. As a result, the council cannot at present provide more detailed comments on the BNG submission and will await the provision of the correct version of the metric with a view to providing detailed comments at that stage.	The Applicant notes this comment and a copy of the **Statutory Biodiversity Net Gain Metric [APP-274]** in excel form has been submitted at Procedural Deadline A.

WC-118	Ecology and Biodiversity	Draft DCO and Control Document Considerations	Draft DCO and Control Document Considerations 9.101.In the council's statutory consultation response (March 2025) requested DCO Submissions / Control Documents relevant to ecology were as follows: Suggested DCO Conditions / Requirements 1. Ecology Mitigation and Enhancement Plan (EMEP) – a scaled drawing showing all existing ecological features, together with mitigation and enhancement measures in relation to solar panel layout. Specify buffer distances, locations of new planting, sowing, and other permanent features, whether retained or created. 2. Biodiversity Monitoring Strategy - detailing surveys of habitats and species / species groups. 3. Detailed Landscape and Ecology Management Plan LEMP (LEMP). 4. Final Construction Environmental Management Plan (CEMP). 5. Secure compliance with approved documents and plans. 6. Lighting Strategy (covering construction and operational / maintenance phases) 7. Requirement for use of horizontal directional drilling (HDD) under watercourses, woodland, hedgerows and any other habitats of importance lying along the cable route. 8. Developer monitoring contribution payable to the LPA – (amount to be agreed) 9. Phasing programme for delivery of	The Requirements contained within Schedule 2 to the **draft Development Consent Order [APP-016]** ensure that no part of the authorised development may commence until an Ecological Protection and Mitigation Strategy (EPMS), Landscape and Ecological Management Plan (LEMP), Construction Environmental Management Plan (CEMP) and Decommissioning Plan are submitted to and approved by Wiltshire Council. The Requirements also determine that each much be in substantial accordance with the outline versions submitted (**outline EPMS [APP-284], outline LEMP [APP-283], outline CEMP [APP-277]** and **outline Decommissioning Strategy [APP-279]).** Breach of a Requirement under the DCO is a criminal offence. Scaled drawings of existing and proposed habitats / ecological features in relation to solar PV panel layout are provided in **ES Volume 2, Figure 3-4 Landscape and Ecology Mitigation Plan [APP-084]**. This plan forms the basis on which the **outline LEMP [APP-283]** has been developed and those measures will be secured as part of the detailed LEMP. Scaled drawing(s) of all retained and newly created habitats / ecological features will be provided as part of the detailed LEMP. The **outline EPMS [APP-284]** specifies buffer distances from all retained habitats / ecological features.

			mitigation, compensation and enhancement alongside development of the solar farm. 10. Decommissioning plan. 9.102. In terms of the Control Documents submitted alongside the DCO application, it is noted that this has included an Outline Ecological Protection and Mitigation Strategy (Outline EPMS) [APP-284]. It is stated that this has been produced to provide ecology focused prescriptions for the construction phase and to support the Outline Construction Environmental Management Plan (Outline CEMP) [APP-277] which has also been submitted with the DCO application. The submission of both these documents is welcomed. 9.103. Other Control Documents submitted alongside the DCO application comprise an Outline Landscape and Ecological Management Plan [APP-283] and Outline Operational Environmental Management Plan [APP-278]. 9.104. It is evident that not all the DCO Conditions / Requirements that were listed in the council's statutory consultation response (as above) have been submitted in support of the DCO application. As such, the Examining Authority is requested to require those documents and plans from the list above that are currently outstanding.	The **outline LEMP [APP-283]** contains an outline ecological monitoring strategy which includes a habitat survey, botanical quadrats, and soil survey, as well as surveys for protected / notable species including birds, bats and great crested newts. The detailed ecological monitoring strategy will be secured through the detailed LEMP. The **outline CEMP [APP-277]** contains a commitment to produce a sensitive lighting strategy which will specify where and how any artificial lighting will be used. The **outline Operational Environmental Management Plan [APP-278]** which is secured by Requirement 14 also contains commitments in relation to lighting during the operational phase. The **outline EPMS [APP-284]** contains the ecologically sensitive lighting strategy With regard to horizontal directional drilling (HDD), the Applicant's commitments are contained within the **outline EPMS [APP-284]**.

WC-119	Ecology and Biodiversity	Draft Development Consent Order	3.1 Draft Development Consent Order [APP-016] Schedule 2 - Requirements 9.105. The draft DCO includes the requirement for submission of a written 'landscape and ecological management plan' (LEMP) for the relevant planning authority's approval in consultation with the relevant statutory nature conservation body as prescribed by DCO Requirement 7, under Schedule 2, which must be substantially in accordance with the outline LEMP. 9.106. The draft DCO also includes a requirement for submission of a written 'ecological protection and mitigation strategy' (EPMS) for the relevant planning authority's approval in consultation with the relevant statutory nature conservation body as prescribed by DCO Requirement 8, under Schedule 2, which must be substantially in accordance with the outline EPMS. 9.107. The draft DCO also includes a requirement for a 'BNG strategy' to be submitted for the relevant planning authority's approval in consultation with the relevant statutory nature conservation body as prescribed by DCO Requirement 9, under Schedule 2, which must be substantially in accordance with the outline LEMP. 9.108. Given that it is anticipated that both of the above DCO Requirements (7 and 8) will require some refinements and changes to suit the flexible design parameter approach under the Rochdale Envelope principles, it would	The Requirements contained within Schedule 2 to the **draft Development Consent Order [APP-016]** anticipate that the various management plan secured (including the **outline EPMS [APP-284]** and the **outline LEMP [APP-283])** will require refinement as the Scheme design evolves**.** As such**,** the outline versions of the plans submitted will continue to be amended and the final versions will be subject to approval by Wiltshire Council in consultation with the relevant statutory nature conservation body.

			appear logical and prudent that the currently presented 'Landscape and ecology mitigation Plan/s' illustrated by [APP-084] (ES, Vol 2, 6.2, Figures 3-4-1 to 3-4-5.2) would also likely require update amendments given that they illustrate the spatial arrangement of the landscape and ecology proposals. This is considered important for planning enforcement function during the operational and maintenance phase of the project. As such, the draft DCO should include provision for this.	
WC-120	Ecology and Biodiversity	Draft Development Consent Order	Schedule 12 – Hedgerows to be Removed Part 1 – Removal of Hedgerows 9.109. Part 1 comprises a table that lists hedgerows which will be subject to removal work. Although the total length of the respective hedgerows are stated, the estimated length of the section to be removed has not been estimated and stated. This is concerning and would presumably allow the Applicant the flexibility to remove any length of the listed hedgerows. If it is feasible for a maximum extent of hedgerow that can be removed to facilitate various activities to be stipulated in Schedule 12 Part 1, the council would welcome that addition within the Draft DCO.	The **outline EPMS [APP-284]** contains the Hedgerow Removal Plan at Annex A. This is in turn secured by Requirement 8 within the **draft Development Consent Order [APP-016].** As such, breach of the controls within the Hedgerow Removal Plan would be a criminal offence. It is therefore not necessary to include controls in relation to hedgerow removal within the main body of the DCO.

WC-121	Ecology and Biodiversity	Draft Development Consent Order	Part 2 – Removal of Important Hedgerows 9.110. It is noted that the contents of Schedule 12, Part 2 and Part 3 does not match that contained within the draft DCO contents page description. 9.111. Part 2 comprises a table that lists a very substantial list of important hedgerows which will be subject to removal work. Although the total length of the respective important hedgerows are stated, the estimated length of the section to be removed has not been estimated and stated. This is a significant concern and would presumably allow the Applicant the flexibility to remove any length of the important hedgerows listed in Part 2. As such, the Examining Authority is requested to necessitate that a maximum extent of important hedgerow that can be removed to facilitate various activities is stipulated in Schedule 12 Part 1. The council remains concerned regarding the potential for removal of extensive lengths of important hedgerow (ordinarily protected by virtue of the Hedgerow Regulations 1997) that the Draft DCO would secure.	The **outline EPMS [APP-284]** contains the Hedgerow Removal Plan at Annex A. This is in turn secured by Requirement 8 within the **draft Development Consent Order [APP-016].** As such, breach of the controls within the Hedgerow Removal Plan would be a criminal offence. It is therefore not necessary to include controls in relation to hedgerow removal within the main body of the DCO.

WC-122	Ecology and Biodiversity	Other Matters	Other Matters 9.112. If the expectation is that Wiltshire Council will carry out all monitoring and compliance obligations during the lifetime of the Scheme, for example in relation to monitoring of the efficacy of ecological mitigation strategies, the LEMP or delivery of BNG, it will be necessary for an appropriate monitoring and compliance fee / financial contribution(s) to be secured. Given the substantive scale of the Scheme together with the duration of the operational phase, it is requested and strongly advised that Wiltshire Council is party to the discussions on this matter.	Wiltshire Council will not be expected to carry out monitoring in relation to the efficacy of ecological mitigation strategies. The preparation, approval and implementation of a detailed Ecological Protection and Mitigation Strategy (EPMS) and a detailed Landscape and Ecological Management Plan (LEMP), substantially in accordance with the **outline EPMS [APP-283]** and the **outline LEMP [APP-284]**, are secured through requirements in Schedule 2 of the **draft Development Consent Order [APP-016]**. Either the Applicant or (should the Applicant transfer the Scheme to a suitably qualified party) the future Scheme owner will be responsible for appointing land managers / contractors and ecologists, in order to ensure all measures within the are delivered, including the ecological monitoring strategy set out in section 1.4 of the **Outline LEMP [APP-284]**.

WC-123	Arboricultu re	Other Matters	10.1. Within ES Vol 3, 6.3 Appendix 10-1: Arboricultural Impact Assessment and Outline Arboricultural Method Statement [APP-206], it is stated that the Applicant has carried out a desk top survey via the following: • Natural England – Ancient Woodland (England) Ref. 10-11 reviewed on 5 June 2025; • Ancient and Veteran Trees – The Woodland Trust – Ancient Tree Inventory Ref 10-12 reviewed on 5 June 2025; • Tree Preservation Orders – GIS Shape Files regarding recorded TPO's – received from Wiltshire Council on 30 May 2025; • Conservation Areas – Historic England Conservation Areas 10.2. The Arboricultural Impact Assessment and Outline Arboricultural Method Statement has taken guidance from BS5837:2012 Trees in relation to design, demolition and construction – Recommendations and BS3998:2010 – Tree Work Recommendations.	The Applicant notes this response and confirms that these are the assessments that have been undertaken.
WC-124	Arboricultu re	Battery Energy Storage System	Battery Energy Storage System 10.3. Unfortunately, the AIA and AMS do not cover any removal or proposed remedial works to trees in relation to the Battery Energy Storage System. 10.4. The proposed BESS with an export capacity of up to 500MW with a maximum area of 5.5ha is located in Lime Down Site D. The 400kV Substation area of up to 4.25ha is also located in Lime Down Site D. Substations up to 0.9ha are proposed in Lime Down Site A, Lime Down Site	10.3: As detailed in **ES, Vol 2, 6.2 Figure 10-2-04 Tree Impact Plan [APP-134]**, the trees located adjacent to the proposed BESS site are identified as not being impacted by the Scheme. On this basis, no tree removal or remedial works in relation to the BESS are required, and therefore no such measures are included within the **6.3 ES Volume 3, Appendix 10-1 Arboricultural Impact Assessment and Outline Arboricultural Method**

			C, Lime Down Site D and Lime Down Site E. [Image - Refer to Representation]	**Statement [App-206]** 10.4: The Applicant notes this response and agrees with the numbers provided.
WC-125	Arboriculture	Battery Energy Storage System	10.5. Within ES Vol 1, 6.1 Chapter 3: The Scheme [APP-055], the foundation depth of the BESS is shown to be up to a maximum of 4m. There are no details shown to indicate that any piled method will be used. ES, Vol 2, 6.2 Figure 10-2-04 Tree Impact Plan [APP-134] does show an impact on the edge of woodland D22-T2, D-T6, D-T7, D-T5, D-T4, D-T3, D22-T3 and D-T8. Further information is required to ensure a detailed AMS is a complete document which will inform site operatives with regard to how the foundations of the BESS will be constructed in close proximity to trees.	Details of BESS foundations are set out within **ES Volume 1, Chapter 3: The Scheme [APP-055]**. Table 3.1 and paragraph 3.3.26 state *'The BESS Containers would be mounted on concrete foundations, although other types of foundations such as compacted gravel, metal pile, or ground screw pile may be used depending on ground conditions'*. **ES Volume 2, Figure 10 2 04: Tree Impact Plan [APP-134]** identifies trees at the edge of woodland group D22, including trees D22 T2, D T6, D T7, D T5, D T4, D T3, D22 T3 and D T8. These trees form part of a wider woodland-style grouping, within which individual tree groups have been identified and the BESS is located sufficiently distant from them so that they will not be impacted. Protection measures for these trees will be installed if deemed necessary by the Arboricultural Clerk of Works at the pre-construction stage The detailed Arboricultural Method Statement will set out the construction

				methodology where works are to be undertaken in proximity to trees. At the pre-construction stage, an Arboricultural Clerk of Works will be appointed to define and oversee the implementation of tree protection measures.
WC-126	Arboriculture	Battery Energy Storage System	10.6. The extract below, taken from ES, Vol 2, 6.2 Figure 10-2-04 Tree Impact Plan [APP-134] indicates possible tree impacts. [Image - Refer to Representation] 10.7. Point 1.2.11 of the ES Volume 3, 6.3 Appendix 3-1: Substations and Battery Energy Storage System Description [APP-182] APFP Regulation 5(2)(a) states: "The foundations would most likely be a concrete piled foundation. Depending on type of soil and presence of clay. Foundation depth can vary up to 4m. The final depth of the foundations will be determined by site investigations." 10.8. The council's Arboricultural Officer believes that the above point relates to the construction of the substations and not the BESS as this is not shown in	Potential tree impacts are illustrated on **ES Volume 2, Figure 10 2 04: Tree Impact Plan [APP-134]**, which identifies where works are proposed in proximity to trees. The parameters used for the assessment of the Battery Energy Storage System (BESS) foundations are set out in **ES Volume 1, Chapter 3: The Scheme [APP-055]** (see Table 3.1 and paragraph 3.3.26), which confirm that foundation depth would be up to a maximum of 12 m, with the final depth to be determined by site investigations. The 12 m maximum is the depth adopted for the purposes of the arboricultural assessment reported in the **ES Volume 3, Appendix 10-1: Arboricultural Impact Assessment [APP-206]**. As this is a minor typographical error that does not change the outcome of the assessment and is clarified within

			the tables below: [Image - Refer to Representation]	**ES Volume 1, Chapter 3: The Scheme [APP-055]**. Therefore, the Applicant does not propose to amend **ES Volume 3, Appendix 3-1: Substations and Battery Energy Storage System Description [APP-182]** at this stage. However, should any substantive amendments be required to this document at a later stage, the Applicant will correct this error at that time.
WC-127	Arboriculture	Battery Energy Storage System	10.9. Impacts to trees in Lime Down Site A-E and land at Melksham Substation have been scoped out of the Environmental Statement by the Planning Inspectorate as stated below: *"The Scoping Report proposes to scope out impacts to trees in Lime Down A to E and Land at Melksham Substation for all phases on the basis that no significant effects are considered likely due to embedded mitigation to avoid impacts on trees and further mitigation to be included within the outline CEMP being in place.* *The Inspectorate notes that the ground level tree surveys of Lime Down A to E and Land at Melksham Substation have identified 36 veteran trees to date. The Scoping Report states that a full tree survey in accordance with BS 5837:2012 is being undertaken at Land at Melksham Substation and other targeted areas within Lime Down A to E and the Cable Route Corridor where the potential exists for arboricultural impacts.*	The Applicant notes this response and agrees that these impacts have been scoped out.

			The Inspectorate agrees that significant effects are not likely to occur on the basis that suitable mitigation would be in place and a full tree survey would be undertaken where the potential exists for arboricultural impacts. As such, the Inspectorate agrees to scope this matter out for all phases. However, the ES should describe the mitigation which has been relied on to avoid significant effects and explain how this has been secured."	
WC-128	Arboriculture	Battery Energy Storage System	10.10. It noted in the Outline Construction Environmental Management Plan (CEMP) (7.12) [APP-277] that a Detailed AMS, based on post-DCO detailed design, will be produced prior to construction commencing and will be included within the detailed CEMP. 10.11. However, the North Wiltshire Local Plan (2011) – Core Policy NE14 Trees, site features and the control of development (Saved Policy) states*: "Permission will not be granted for proposals that would result in or be*	The commitments to prepare a detailed Arboricultural Method Statement (AMS) and a Piling Risk Assessment are set out in the **Outline Construction Environmental Management Plan (CEMP) [APP-277]**. As identified at paragraph 7.12 of the Outline CEMP, the detailed AMS will be prepared following the grant of the DCO, informed by post consent detailed design, and will be incorporated within the detailed CEMP. The **Outline CEMP [APP-277]** also secures that any piling activities will be subject to a Piling Risk

			likely to result in the loss of trees, hedges, lakes / ponds or other important landscape or ecological features that could be successfully and appropriately incorporated into the design of a development." 10.12. Additionally, the National Planning Policy Framework (NPPF 2023), Section 15, Conserving and enhancing the natural environment seeks to ensure that new development is sustainable and underlines the importance of green infrastructure, of which trees form an integral part. This includes recognition of the importance of trees in relation to the management of air, soil and water quality along with other associated ecosystem services and climate change adaption. The NPPF also seeks to achieve the protection and enhancement of landscapes and a net gain in biodiversity. Finally, it specifically identifies veteran and ancient trees and woodland as a highly valuable and irreplaceable habitat. 10.13. It is noted above that the 132kv and 400kv substations are noted to have piled foundations up to a maximum of 12 metres, the activity will be subject to appropriate design and risk assessment in line with a piling risk assessment in line with the CL:AIRE guidance document Piling and Penetrative Ground Improvement Methods on Land Affected by Contamination: Guidance on Pollution Prevention (CL:AIRE, 2025, originally published by the Environment Agency, 2001). The presence of historic	Assessment in accordance with Piling and Penetrative Ground Improvement Methods on Land Affected by Contamination: Guidance on Pollution Prevention (CL:AIRE, 2025; originally published by the Environment Agency, 2001). As set out within **ES Volume 1, Chapter 10: Arboriculture [APP-062]**, the Scheme has been designed through an iterative process to retain existing arboricultural features as far as practicable and to avoid and reduce impacts on trees, groups of trees and woodland. This approach of iterative design is commonly taken for solar DCOs and schemes where data is received by the design team over a period of weeks or months. No veteran or ancient trees are proposed to be removed to facilitate the Scheme. The Scheme includes landscape and ecological mitigation and enhancement which includes tree planting. This is set out within the **Outline Landscape and Ecological Management Plan [APP-283]** and presented **ES Volume 2, Figure 3-4 Landscape and Ecology Mitigation Plan [APP-084]**, with the resulting biodiversity net gain considered in the **Biodiversity Net Gain Assessment Report [APP-273]**. Relevant information related to detailed construction methodology will be provided in the detailed AMS, which will be produced following DCO consent being granted and prior to construction commencing.

			contamination, the piling methods required and the sensitivity of underlying groundwater will be considered in pile design. The requirement to undertake piling risk assessment prior to construction is secured in the Outline CEMP (7.12) [APP-277]. 10.14. The council's Arboricultural Officer requires further information regarding construction of the piling method to form part of the Detailed AMS along with details on how the piles will be placed in situ, their locations in relation to trees and whether the piles will be placed in sleeves to prevent any toxicity to the rooting areas of trees.	
WC-129	Arboriculture	Solar PV sites	10.15. The following is noted: • Figure 2-2-1: Field Boundaries and Numbering Lime Down Site A – Each of the Solar PV Sites was divided into numbered fields. Lime Down Site A comprises twelve fields A1, A2, A3, A4, A5, A6, A7, A8, A9, A10, A11 and A12 • Figure 2-2-2: Field Boundaries and Numbering Lime Down Site B – Seven fields are contained within Lime Down Site B comprising B6, B7, B8, B9, B10, B11 and B12 • Figure 2-2-3 Field Boundaries and Numbering Lime Down Site C – Twenty six fields are contained within Lime Down Site C, comprising C1, C5, C6, C7, C8, C9, C10, C11, C12, C13, C14, C15, C16, C17, C18, C19, C21, C22, C23, C29, C30, C31, C32, C33, C34 and C35 • Figure 2-2-4 Field Boundaries and Numbering Lime Down Site D –	The Applicant notes this response and agrees with its contents.

			Twenty-four fields are contained within Lime Down Site D comprising D1, D2, D3, D4, D5, D6, D7, D8, D9, D10, D11, D12, D13, D14, D15, D16, D17, D18, D19, D20, D21, D22, D23 and D24. The BESS is proposed in field parcels D1 and D22.	
WC-130	Arboriculture	Solar PV sites	10.16. It is assumed that permanent access points will be 6.5m width, BESS and substation access will be 6m width, internal tracks will be 3.5m and vehicular passing places will be 6m. The permanent easement for the cables within the Cable Route Corridor will be 10m. 10.17. Further details are required to form part of the Detailed AMS regarding more precise measurements of all access points along with any proposed tree removal considering it is only assumed at this point.	The Applicant notes these comments. Indicative widths for access points, internal tracks, passing places and the cable route corridor easement are set out within **6.1 Environmental Statement Volume 1, Chapter 10 Arboriculture [APP-062], 6.1 Environmental Statement Volume 1, Chapter 3 The Scheme [APP-055], and 7.4 Design Principles and Parameters [APP269]** and have informed the assessment presented in **ES Volume 1, Chapter 10: Arboriculture [APP-062]** and the **Arboricultural Impact Assessment and Outline Arboricultural Method Statement [APP-206].** For ease of reference, the indicative widths are outlined below: • BESS Area and Substation: maximum 6 m wide road with 8 m passing places • Solar PV: maximum 3.5 m wide with 6 m passing places • Permanent easement for cables: A 10 m permanent easement will be secured along the route, with the exception of

				a small number of major crossing locations, where the final easement width will be confirmed at detailed design stage As set out in the **Outline Construction Environmental Management Plan (CEMP) [APP-277]**, a detailed Arboricultural Method Statement (AMS) will be prepared following the grant of the DCO and prior to the authorised development commencing. The CEMP is secured via Requirement 13 of **the draft Development Consent Order [APP-016]** The detailed AMS will include more precise measurements of access routes and details of any tree removal or protection measures informed by post consent detailed design.
WC-131	Arboriculture	Solar PV sites	10.18. It is noted in the Outline CEMP (7.12) [APP-277] that Temporary Construction Compounds will be sited outside of the canopy spreads of adjacent trees and woodlands. 10.19. A 242m section of internal access track is proposed within the 15m Ancient Woodland Buffer Zone of North Bincombe Wood in Lime Down Site E. This comprises of an existing gravel track along the northern extent of the woodland. No tree removal is noted as the existing subbase should be preferably retained. If hand excavation and root pruning is required to establish the subbase, several trees on the woodland edge could suffer from loss of fibrous roots.	The proposed internal access track within Lime Down Site E, including the section located within the 15 m Ancient Woodland Buffer Zone of North Bincombe Wood, has been assessed within **ES Volume 1, Chapter 10 Arboriculture [APP-062]**, the **Arboricultural Impact Assessment and Outline Arboricultural Method Statement [APP-206]**. No impacts are predicted, as there will be no change in the use of the existing access track, which is already used by heavy agricultural machinery. As set out in the **Outline CEMP [APP-277]**, detailed construction methodologies, including any measures required where works are undertaken in

				proximity to trees or woodland, will be provided in the detailed Arboricultural Method Statement (AMS). The detailed AMS will be prepared following the grant of the DCO and prior to construction commencing and will inform site operatives on appropriate working methods in these areas. Construction methods to be outlined in a detailed AMS.
WC-132	Arboriculture	Solar PV sites	10.20. No details have been provided within the AIA and AMS with regard to the procedure when root pruning is required. Guidance should be taken from 7.2.2, 7.2.3 and 7.2.4 (noted below) in relation to BS5837:2012. All works should be carried out in compliance with this document, and specifically: • 7.2.2 Roots, whilst exposed, should immediately be wrapped or covered to prevent desiccation and to protect them from rapid temperature changes. Any wrapping should be removed prior to backfilling, which should take place as soon as possible. • 7.2.3 Roots smaller than 25mm diameter may be pruned back, making a clean cut with a suitable sharp tool (e.g. bypass secateurs or handsaw), except where they occur in clumps. Roots occurring in clumps or of 25mm diameter and over should be severed only following consultation with an arboriculturist, as such roots might be essential to the tree's health and stability. • 7.2.4 Prior to backfilling, retained roots	Where root pruning is required, and where specified by the Arboricultural Clerk of Works, works will be carried out in accordance with BS 5837:2012 Trees in relation to design, demolition and construction – Recommendations. Compliance with the relevant guidance, including Sections 7.2.2, 7.2.3 and 7.2.4, will be detailed within the detailed Arboricultural Method Statement (AMS), which will be prepared prior to construction commencing, should the DCO be granted.

			should be surrounded with topsoil or uncompacted sharp sand (builders' sand should not be used because of its high salt content, which is toxic to tree roots), or other loose inert granular fill, before soil or other suitable material is replaced. This material should be free of contaminants and other foreign objects potentially injurious to tree roots.	
WC-133	Arboriculture	Cable Route Corridor	10.21. The Cable Route Corridor is noted to be approximately 22 km from Lime Down Site D to the existing National Grid Substation in Melksham along with connection to each of the Solar PV Sites. The approximate total area is noted as 463.2 ha. The Cable Route Corridor Order limit is noted to have a width of 50m increasing to 665m in a number of locations to provide space for trenchless construction techniques, temporary construction compounds and to avoid features such as trees, hedgerows and field boundaries.	The Applicant notes this response and agrees with its contents.
WC-134	Arboriculture	Cable Route Corridor	10.22. Outline CEMP (7.12) [APP-277] indicates that where construction must occur within the RPA of trees, ground protection is proposed to be installed to prevent compaction issues. The appropriate type of ground protection will be based on the weight of traffic, pedestrian footfall and reinforced systems for heavy traffic. This should comply with BS5837:2012 Recommendations.	The Applicant notes this response and agrees with its contents.

WC-135	Arboriculture	Cable Route Corridor	10.23. Micro-siting techniques are proposed to minimise root disturbance within the cable route area. If work is carried out within the RPA of trees, guidance and supervision will be undertaken by an Arboricultural Clerk of Works (ACoW). Any excavation should be carried out by hand, this should be in compliance with BS5837:2012.	The Applicant notes this response. As stated within Table 4 of the **Outline Construction Environmental Management Plan (CEMP) [APP-277]**, where construction activities are required within the Root Protection Area (RPA) of retained trees, these works will be undertaken under ACoW supervision and direction and will be in compliance with BS 5837:2012. Should root pruning be required, then this will be undertaken under ACoW supervision and will carried out by hand if deemed necessary by the ACoW.
WC-136	Arboriculture	Cable Route Corridor	10.24. HDD (Horizontal Directional Drilling) will be used to prevent any damage to roots, a minimum depth of 1m to bypass the majority of roots will be used, especially when roots are normally located in the first 600mm of soil. All HDD machinery is noted to be sited outside the canopies and RPAs of retained trees with the entry and exit points sited more than 15m from tree stems.	As set out within the **Outline Construction Environmental Management Plan (CEMP) [APP-277]**, detailed construction methods and locations for Horizontal Directional Drilling (HDD) will be provided within the detailed Arboricultural Method Statement (AMS). The detailed AMS will be prepared following the grant of the DCO and prior to the authorised development commencing and will set out construction methodologies in accordance with best practice for working in proximity to trees. The entry and exit points will be set outside the RPAs of retained trees and will only be constructed when adequate tree protection measures for retained trees are in place. The Applicant can confirm HDD depths would be greater than 1 m beneath the surface.

WC-137	Arboriculture	Cable Route Corridor	10.25. For open cut sections, the maximum width of the trench(es) will be 1.7m and the maximum depth of the trenches will be 2m. For trenchless (e.g. HDD) sections, trenchless machinery will typically require an area of 25m x 25m at entry and exit points and the maximum depth of the trenchless solution will typically be 12m. For open cut sections, a permanent easement will be required around the cables whereby no trees may remain in order to avoid root interference with the cables. The location of the permanent easement will be determined post-DCO by the engineering team and will be 10m in width. 10.26. Further details are required as part of a Detailed AMS regarding the location of the permanent easement as this will be determined post-DCO.	The Applicant makes note of these comments and agrees. Indicative construction parameters for open cut and trenchless (e.g. Horizontal Directional Drilling (HDD)) cable installation, including trench dimensions, working areas for trenchless entry and exit pits, cable depths and the requirement for a permanent cable easement of 10 m width, are set out within the application and inform the assessment presented in **ES Volume 1, Chapter 10 Arboriculture [APP-062]** and the **Arboricultural Impact Assessment and Outline Arboricultural Method Statement [APP-206]**. As identified in Paragraph 4.2.2 of the **Arboricultural Impact Assessment and Outline Arboricultural Method Statement [APP-206]**, the precise location of the permanent cable easement will be determined following the grant of the DCO. Further detail regarding the location of the permanent easement, along with associated construction methodologies, will be provided within the detailed Arboricultural Method Statement (AMS), which will be prepared post consent and prior to construction commencing. Details of the above will be set out in the Detailed AMS to be produced should the DCO be granted.

WC-138	Arboricultu re	Cable Route Corridor	10.27. It is noted that seven temporary construction compound areas have been proposed along the Cable Route Corridor. One of which is located within a 15m Ancient Woodland Buffer Zone of W0001 – Surrendell Wood, south of Parcel C15. There is an existing gravel farm track situated between Surrendell Wood and the outer extents of the ancient woodland's eastern extent. The track has been described as being subject to the use of historical heavy agricultural machinery use which has caused compact issues as a result. It is envisaged that due to compaction and variances of ground levels between woodland trees, the existing access surface and the outer limits of the proposed Temporary Construction Compound root ingress to the full extent of the 15m buffer zone is considered to be low. The council's Arboricultural Officer has concerns on how the Temporary Construction Compound will be constructed as noted below.	Construction-phase tree protection and management measures are set out in the **Outline Construction Environmental Management Plan (Outline CEMP) [APP-277]**. The preparation, approval and implementation of detailed management plans, substantially in accordance with the outline plans, are secured through requirements in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring ancient and veteran trees are protected throughout the lifetime of the Scheme. As stated in the **Outline CEMP [APP-277]**, Temporary Construction Compounds will be located outside the canopy spread and Root Protection Areas (RPAs) of adjacent trees and woodland. As stated in Paragraph 2.1.20 of the **Arboricultural Impact Assessment and Outline Arboricultural Method Statement [APP-206]** '*The positions of all trees, groups of trees and woodlands plotted in the Cable Route Corridor survey were estimated from aerial imagery with the assistance of GPS hardware only and not based on a topographical survey*.' As mentioned in the comment, the track adjacent to Surrendell Wood has been subject to historical heavy agricultural machinery use and ground conditions along the track are expected to be compacted as a result. This compaction and the localised variances in ground levels between woodland trees, the existing access surface and the outer limits of the proposed

				temporary construction compound make for unfavourable growing conditions and the potential for root ingress to the full extents of the 15m buffer Zone is considered low. Any impacts to Surrendell Wood as a result of the construction of the Temporary Construction Compound are considered to be neutral, taking into account that construction of the Temporary Construction Compound will be outside the canopy spread and RPAs of retained trees and be sited in accordance with the commitments set out in the **Outline CEMP [APP-277]**.
WC-139	Arboricultu re	Cable Route Corridor	10.28. From looking at the Tree Impact Plans, namely Figure 10-02 Tree Impact Plan Index Sheet, Figure 10-2-04 and Figure 10-2-08, Figure 10-2-09 and Figure 10-2-18, Figure 10-2-11, Figure 10-2-12, Figure 10-2-14, and Figure 10-2-16, the council's Arboricultural Offficer can only identify six temporary construction compound areas from the plans provided. 10.29. The council's Arboricultural Officer has concerns about how the Temporary Construction Compounds will be constructed to accommodate parking provisions, loading and unloading areas for plant and materials, storage areas, wheel washing facilities and construction traffic. The Outline Construction Environmental Management Plan (7.12) [APP-277] states the TCC will be sited outside the canopy spreads and RPAs of adjacent trees and woodlands. However, the	10.28: The Temporary Site Compounds can be found in the Tree Impact Plan Figure 10-2-04, 10-2-09, 10-2-11, 10-2-12, 10-2-14, and two Temporary Site Compounds in Figure 10-2-16, for a total of seven Temporary Site Compounds. 10.29: Construction-phase tree protection and management measures are set out in the **Outline Construction Environmental Management Plan [APP-277]**. The preparation, approval and implementation of detailed management plans, substantially in accordance with the outline plans, are secured through requirements in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring ancient and veteran trees are protected throughout the lifetime of the Scheme. As stated in the **Outline CEMP [APP-277]**, Temporary Construction Compounds will be located outside the

			Tree Impact Plans clearly show some encroachment. The red hatched area on Figure 10-2-11 Tree Impact Plan implies 'possible tree impacts' as shown below. [Image - Refer to Representation]	canopy spread and Root Protection Areas (RPAs) of retained adjacent trees and woodland. As identified in the **Arboricultural Impact Assessment and Outline Arboricultural Method Statement [APP-206]**, the precise siting of the temporary construction compounds will be confirmed at detailed design stage following the grant of the DCO. Further information regarding their location, together with associated construction methodologies and tree protection measures, will be set out within a detailed Arboricultural Method Statement (AMS). The detailed AMS will be prepared post-consent, prior to the commencement of construction, and will be submitted to and approved by Wiltshire Council.

WC-140	Arboricultu re	Cable Route Corridor	10.30. Perusing the Outline CTMP (7.22) [APP-287], the council's Arboricultural Officer notes that detailed information and design relating to the laydown and accommodation areas is not yet available. It is assumed that this will be provided as part of the detailed CTMP and detailed design submissions, which will be required for council approval in due course. These details should also be included within the Detailed AMS so that the impact on trees and hedgerows can be fully assessed and considered. 10.31. Tree protection fencing appears to be compliant with BS5837:2012. 10.32. A detailed Arboricultural Method Statement, based on post-DCO detailed design, will be produced prior to construction commencing and will be included within the detailed CEMP.	The Applicant makes note of these comments. A detailed Arboricultural Method Statement, informed by post DCO detailed design, will be prepared prior to construction commencing and will be incorporated within the detailed Construction Environmental Management Plan (CEMP). The detailed AMS will be required to be submitted to and approved by Wiltshire Council in accordance with the relevant requirement in Schedule 2 of the **Draft Development Consent Order [APP-016]**, and construction works will be carried out in accordance with the approved AMS.
WC-141	Arboricultu re	Cable Route Corridor	10.33. The council's Arboricultural Officer requires the following to also be included in the Detailed Arboricultural Method Statement:- • Details of foundations regarding the BESS along with details of any tree removal or remedial works required; • Further details of the pile construction for the substations; • Location of the permanent easement as this will be determined post-DCO. • More precise measurements of all access points along with any proposed tree removal considering it is only assumed at this point.	The matters raised by the Council's Arboricultural Officer will be addressed through the preparation of the detailed Arboricultural Method Statement (AMS), which will be informed by detailed design after consent is granted. The detailed AMS will include information relating to Battery Energy Storage System (BESS) foundations, any associated tree removal or remedial works, details of pile construction for the substations, the location of the permanent cable easement (to be determined after consent is granted), and more precise measurements of access points where

				relevant. The detailed AMS will be prepared prior to construction commencing and will be required to be submitted to and approved by Wiltshire Council in accordance with the relevant requirement in Schedule 2 of the **Draft Development Consent Order [APP-016]**. Construction works will be carried out in accordance with the approved AMS.
WC-142	Hydrology, Flood Risk and Drainage	Policy Considerations	11.1. The Flood Risk Assessment and Drainage Strategy Documents (ES, Vol 3, 6.3 Appendices 11-1 to 11-9 [APP-210 to APP-218] reference the NPPF (2023) and Wiltshire Local Polan Policy 95 (Flood Risk) and Policy 96 (Water Resources). 11.2. The sequential and exception tests appear to have been applied correctly, with solar PV panels and substations located in Flood Zone 1, wherever feasible. 11.3. Compliance with climate change allowances (+71% flow uplift for 2080s) is demonstrated using Manning's calculations and NaFRA2 mapping. 11.4. However, explicit linkage to Wiltshire Council's Strategic Flood Risk Assessment (SFRA) Level 1 guidance is missing. It is recommended that the emerging Wiltshire SuDS Supplementary Planning Document for runoff control and biodiversity integration is cross-referenced.	The Applicant notes Wiltshire Council's comments on policy compliance and welcomes the acknowledgement that the sequential approach and climate change allowances have been applied appropriately within the Flood Risk Assessment and Drainage Strategy suite, as set out in **ES Volume 3, Appendix 11-1: Flood Risk Assessment and Drainage Strategy - Covering Report [APP-210]** and **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [APP-063]**. The Applicant agrees that clearer signposting to Wiltshire Council's SFRA Level 1 guidance and the emerging SuDS Supplementary Planning Document is appropriate and will be incorporated by update to the relevant submitted documents at Deadline 1. This clarification does not change the assessment conclusions on flood risk, drainage or policy compliance.

WC-143	Hydrology, Flood Risk and Drainage	Environmental Assessment Considerations	11.5. The area has experienced frequent and significant flooding events. It is considered that the environmental assessment methodology aligns with Environment Agency guidance, including the use of Flood Map for Planning, NaFRA2, LiDAR-based depth estimation, and conservative assumptions for floodplain displacement. 11.6. However, there is limited discussion on the combined impacts of the cable connection route and the solar sites during construction within the cumulative assessment. Therefore, it is recommended that a temporary works risk assessment is included so that this matter can be fully discussed in the examination. 11.7. With regards to residual effects, the Flood Risk Assessment concludes that there is a Negligible to Low risk from all sources. This conclusion is not disputed subject to embedded mitigation. 11.8. However, there is a need to strengthen the commitment to maintain 8m easements around watercourses and confirmation of the use of HDD for sensitive crossings.	The Applicant agrees and acknowledges that the area has experienced frequent flooding and notes that the assessment methodology has been accepted as aligning with Environment Agency guidance. All sources of flood risk, including fluvial, surface water, groundwater and climate change effects, have been assessed using Flood Map for Planning, NaFRA2, LiDAR-informed analysis and conservative assumptions, as set out in **ES Volume 1, Chapter 11 Hydrology, Flood Risk and Drainage [APP-063]** and the accompanying **ES Volume 3, Appendix 11-1: Flood Risk Assessment and Drainage Strategy suite [APP-210 to 218].** The combined construction-phase effects of the solar sites and the Cable Route Corridor have been fully assessed within **ES Volume 3, Appendix 11-9 Flood Risk Assessment and Drainage Strategy – Cable Route Corridor [APP-218]**, alongside embedded construction controls. Mitigation measures—including temporary drainage arrangements, prescribed working methods, and protection of watercourses—are set out in the **Outline Construction Environmental Management Plan [APP-277]** and secured through DCO Requirement 13. No reliance is placed on Flood Zone classification alone; rather, it considers all relevant sources and pathways of flood risk. With the embedded

				measures applied, residual effects are assessed as Negligible to Low. In addition, following discussion with Wiltshire Council as LLFA, a temporary works risk assessment will be incorporated within the **Outline Construction Environmental Management Plan [APP-277]** to clearly set out how temporary drainage arrangements, sequencing and contingency measures will manage any combined construction-phase interactions between the solar sites and the Cable Route Corridor. This will be secured through the DCO discharge process and will not alter the assessment conclusions. Commitments to maintain appropriate buffers to watercourses and to use trenchless techniques (including HDD) at sensitive crossings are established within the **Design Principles and Parameters [APP-269]** and secured through the consenting framework, with detailed methodologies subject to approval by the relevant risk management authorities. On this basis, the matters raised are already addressed within the submitted application documents and no further amendments are required.

WC-144	Hydrology, Flood Risk and Drainage	Draft DCO and Control Document Considerations	11.9. The Requirements in the draft DCO [APP-016] should include a Requirement for the LPA to formally approve the detailed design and methodology for HDD watercourse crossings. 11.10. The final design drawings should also include GIS-based flood risk mapping for clarity. 11.11. Compliance with the Wiltshire LLFA guidance on SuDS and runoff rates should also be secured. 11.12. The outline Construction Environmental Management Plan (7.12) [APP-277] includes flood risk protocols, but explicit reference to EA Floodline registration for maintenance teams is required. The flood risk emergency protocols should also be detailed. 11.13. Explicit reference to floodplain compensation principles, even if impact negligible, is required for transparency. 11.14. It is also considered that groundwater levels in SPZ areas should be monitored during construction. 11.15. Furthermore, it is noted that there is no formal drainage proposed for the cable connection route within the Drainage Strategy. Whilst this is acceptable given the subsurface design, the runoff control for compounds and access tracks require confirmation. 11.16.	With regard to LPA approval for HDD design and methodology, this is already controlled by a number of mechanisms within the **draft Development Consent Order [APP-016]** and accompanying management plans. The **outline Ecological Protection and Mitigation Strategy [APP-284]** sets out the precautionary HDD methodology. The **outline Construction Environmental Management Plan [APP-277]** also contains mitigation and enhancement measures in relation to HDD and night time construction use. Both plans are secured within the Requirements contained at Schedule 2 to the **draft DCO [APP-016]** and, as such, final versions will be subject to approval by Wiltshire Council. In relation to paragraph 11.10, there is no reason why GIS-based flood risk mapping cannot be presented on final design drawings where this would aid clarity. The Flood Risk Assessment and Drainage Strategy **ES Volume 3, Appendices 11-1 to 11-9: Flood Risk Assessment and Drainage Strategy suite [APP-210 to 218]** already defines the relevant flood extents and climate change scenarios. Where detailed design drawings are submitted for approval under the relevant Requirements of the **draft Development Consent Order [APP-016]**, these can include appropriate mapped flood risk information derived from the approved assessment to clearly demonstrate compliance.

			The outline Landscape and Ecological Management Plan (7.18) [APP-283] supports riparian buffer planting. However, it is recommended that this is integrated with SuDS features for biodiversity gain. 11.17. The Applicant is encouraged to undertake early engagement with Wiltshire LLFA for discharge of flood risk-related Requirements.	In relation to the Wiltshire LLFA guidance on SuDS, the **outline Construction Environmental Management Plan [APP-277]** contains a commitment to produce a Water Management Plan (which will form part of a detailed CEMP) which will include details of pre-construction, construction, and post-construction water quality monitoring. This will be based on a combination of visual observations and reviews of the Environment Agency's automatic water quality monitoring network. The **outline Construction Environmental Management Plan [APP-277]** also contains commitments in relation to discharge and disposal of site runoff, temporary drainage, spillage and flood risk. The final Construction Environmental Management Plan is secured via Requirement 13 of the **draft Development Consent Order [APP-016]** and will therefore be subject to the approval of Wiltshire Council. The submitted assessment and control framework are also set out in Environmental Statement **ES Volume 1, Chapter 11 Hydrology, Flood Risk and Drainage [APP-063]**, Flood Risk Assessment and Drainage Strategy – Lime Down Cable Route Corridor **[APP-**218**]**, **Outline Construction Environmental Management Plan [APP-277]** and the **Draft Development Consent Order [APP-016]**, which together provide for appropriate approval and control of these matters through discharge and consultation with the relevant bodies.

				The Applicant confirms that **Outline CEMP [APP-277]** will be updated ahead of Deadline 1 to add explicit reference to EA Floodline registration for maintenance teams and monitoring of groundwater level in SPZ areas. Although **ES Volume 3, Appendices 11-1 to 11-9: Flood Risk Assessment and Drainage Strategy suite [APP-210 to 218]** conclude that effects on floodplain storage are negligible, the Scheme will adhere to established floodplain compensation principles should any localised loss of flood storage be identified during detailed design. Any such requirements would be developed in consultation with the relevant risk management authority and implemented in accordance with Environment Agency guidance. The cable connection route is predominantly subsurface infrastructure and does not require a standalone operational drainage strategy. Runoff control for temporary compounds, access tracks and working areas will be confirmed through the discharge of the relevant DCO Requirements, informed by the **Outline CEMP [APP-277]**, including temporary drainage measures, protection of existing land drainage and reinstatement. Riparian buffer planting is secured through the **Outline Landscape and Ecological Management Plan [APP-283]** and will be integrated with drainage design where appropriate, so that SuDS features deliver both water

				management and biodiversity objectives, subject to detailed design at discharge. The Applicant also notes the encouragement for early engagement with Wiltshire LLFA and will continue engagement as the project progresses through the discharge of relevant Requirements.
WC-145	Cultural Heritage	Policy Considerations	12.1. ES Vol 1, 6.1 Chapter 12 Cultural Heritage [APP-064] references expected legislation and guidance and, in the council's Conservation Officer's opinion, demonstrates a proportionate and informed approach to assessing and mitigating impacts on designated and non-designated built heritage assets.	The Applicant welcomes the Council's confirmation that the assessment approach is proportionate and informed.
WC-146	Cultural Heritage	Built Heritage	12.2. The assessment methodology:: • Follows guidance from Historic England, including GPA Notes 2 (Managing Significance in Decision Taking) and 3 (The Setting of Heritage Assets), Advice Notes 12 (Statements of Heritage Significance) and 15 (Commercial Renewable Energy Development), and the Conservation Principles. • The ZoI and Study Area are informed by ZTVs, site visits, and professional judgement. • The assessment includes a Statement of Heritage Significance [ES Vol 3, 6.3 Appendix 12-1: Heritage Statement [APP-219] and uses a clear matrix to determine sensitivity, magnitude of effect, and significance of impact.	The Applicant notes the Council's confirmation that the methodology follows Historic England guidance, is proportionate and informed by consultation and professional judgement.

			• The methodology is proportionate and reflects consultation with statutory consultees, including Historic England and Wiltshire Council.	
WC-147	Cultural Heritage	Built Heritage	12.3. The council's Conservation Officer was consulted on the scoping exercise to determine the assets to be scoped in for assessment. Where the council suggested additional assets for inclusion, these were included and the officer considers that based on the information presented, there are no major gaps evident in the approach. 12.4. The assessment of heritage significance appears thorough and, although there is inevitably a high reliance on intervisibility and perhaps less focus on historic (such as functional and landholding / ownership connections) and experiential and intangible values such as tranquillity and sense of place, in such cases where assessment of a very high number of assets is required, these are considered in more detail in appropriate circumstances based on professional judgment. For example, in the case of some of the farms where there is a greater likelihood of historic connection. 12.5. Therefore, it is considered that the	The Applicant welcomes the Council's confirmation that the assessment scope reflects consultation with the Council and that the assessment is evidence-based. The Applicant also notes the Council's observation that the Applicant has responded to Historic England's concerns about Bradfield Manor Farmhouse have through design refinements and embedded mitigation.

			assessments are generally well-reasoned and supported by evidence: • All impacts to built heritage assets (designated and non-designated) are assessed as less than substantial harm, typically at the lower end. • The ES, Vol 1, 6.1 Chapter 12: Cultural Heritage [APP-064] acknowledges Historic England's concerns about Bradfield Manor and responds with design refinements and embedded mitigation. • The significance of effects is clearly distinguished from NPS-defined harm, with professional judgement used to bridge terminology.	

WC-148	Cultural Heritage	Built Heritage	12.6. However, a couple of examples, which are considered to be omissions or slight differences of opinion in terms of the level of impact of the proposals on individual assets were noticed within the assessment tables contained within the Heritage Statement [APP-219]. Examples include: • Rodbourne Conservation Area – The potential impact on setting from the highway improvement area has not been assessed; • Townleaze Barn non-designated heritage asset – It is not clear why harm is identified here when there are arguably other assets which are affected to a greater extent for which the impact is considered to be neutral; • Farleaze Farm – The potential impact from Lime Down Site D does not appear to have been assessed. It is unclear how the situation differs significantly from Surrendell Farm, where less than substantial harm has been identified. 12.7. Whilst the commentary around these particular decisions could be enhanced, the council's Conservation Officer does not consider that they would result in any new instances of significant harm and therefore would have no impact on the overall conclusions reached. Therefore, overall, the conclusions are considered to be credible. More explicit use of photomontages or verified visualisations might have been useful to support the setting assessments but,	**ES Volume 1, Chapter 12 Cultural Heritage [APP-064]**, supported by **ES Volume 3, Appendix 12.1: Heritage Statement [APP-219]**, has assessed the potential impact of the Scheme on built heritage assets, and where required appropriate mitigation has been proposed (see Section 12.9 of **ES Volume 1, Chapter 12 Cultural Heritage [APP-064]** for embedded mitigation). As stated in Section 3.7 of the **Outline Construction Environmental Management Plan [APP-277]**, construction traffic routes have been identified to avoid large increases in HGV movements near to heritage assets. Highway improvement works would cause at most temporary construction effects and would not result in harm to Rodbourne Conservation Area's significance. Therefore, a neutral effect was identified as a result of the Scheme to the Conservation Area. Townleaze Barn (MWI65981) is located directly to the south-west of the cable route corridor (Fields F132-F136). As noted in **ES Volume 3, Appendix 12.1: Heritage Statement [APP-219]** the asset would experience temporary localised indirect (i.e setting) impacts during the construction phase. Consequently, it was identified that was a potential for a negligible adverse effect, which is not significant (less than substantial harm at the lower end in NPPF terms).

			taking into account the largely low level of residual impact, the decision not to undertake these is understood.	Several assets located adjacent to the cable route were assessed as having a neutral effect (not significant). Land within the cable route corridor was not identified as contributing to the significance of these assets (whereas land within the cable route corridor was assessed as contributing to the significance of the Townleaze Barn (MWI65981)). A neutral effect, which is not significant, was identified to Grade II Listed Farleaze Farm (NHLE 1251985) located c.0.16km to the south of Green Hill C (Field C25) and 1.07km to the west of Green Hill D (Field D24). Woodland located to the east of Pig Lane screen the asset from the western section of Green Hill D (i.e. Field D24). The Applicant confirms that Lime Down D was considered in the assessment of the effect of the Scheme on this asset. Field C26 has been removed from the Scheme Order Limits. No above ground solar infrastructure is proposed in Fields C24, C25, C27 and C28, where cabling is proposed in these fields its installation would be temporary and screened by intervening topography and established vegetation. The cable route corridor is located c.80m to the west of the Grade II Listed Surrendell Farm and associated buildings (NHLE 1198980, 1023212 and 1283578). While the intervisibility between the assets and land within the cable route corridor may result in

				indirect (i.e setting) impacts during installation of the cable route, these would be temporary and localised. Consequently, it was identified that there was potential for a minor / moderate adverse effect, which is not significant (less than substantial harm at the lower end in NPPF terms). The differing conclusions between Farleaze Farm and Surrendell Farm reflect the closer proximity of the cable route to Surrendell Farm, the greater degree of intervisibility, and the presence of temporary construction activity within its immediate setting, none of which apply to Farleaze Farm where visibility is more limited and effects are either screened or negligible. The Applicant notes the Council's concluding remarks about the credibility of the conclusions in **ES Volume 1, Chapter 12 Cultural Heritage [APP-064]** and **ES Volume 3, Appendix 12.1: Heritage Statement [APP-219]** and the use of photomontages and visualisations in the assessment.

WC-149	Cultural Heritage	Built Heritage	12.8. In response to concerns raised by Historic England, further assessment was carried out in respect of Bradfield Manor and it is understood that a joint internal site visit was undertaken. There is reference in the Heritage Statement [APP-219] to the findings, but the relevant Appendix is restricted to a single plan / cross section detail with no additional commentary or discussion. Therefore, the Heritage Statement could benefit from a more detailed justification for concluding the harm is "*less than substantial*" and "*not significant*" in EIA terms. 12.9. The Grade I listed manor's core is a 15th-century hall, with later additions including a 17th-century parlour block designed to take advantage of views over the surrounding estate including land to be occupied by the site which was formerly within the manor's ownership. The site section suggests that the solar arrays in the adjacent fields and the BESS (Battery Energy Storage System) and substation are likely to be visible from the upper floors, including the parlour block, altering the character of the landscape. Historic England have suggested that "*Photographs taken during the visit could usefully inform accurate visualisations of the worst-case scenario (i.e. panels at maximum height), helping assess the impact on views from the manor. The council recommends these are used to explore potential refinements to the scheme layout to reduce or avoid harm*."	A site visit with Historic England was undertaken in the grounds of Bradfield Manor Farmhouse (NHLE: 1198808) on the 22 May 2025 (see Table 12-2 in **Chapter 12: Cultural Heritage [APP-064]**). Feedback provided during the site visit was used to inform the Scheme design and assessment provided in **Chapter 12: Cultural Heritage [APP-064]**. **ES Volume 1, Chapter 12 Cultural Heritage [APP-064]**, supported by **ES Volume 3, Appendix 12.1: Heritage Statement [APP-219]**, identified that there was a potential for a moderate / minor adverse effect on Bradfield Manor Farmhouse, which is not significant (less than substantial harm at the lower end in NPPF terms). The Applicant will produce a technical note, with a more detailed justification for the conclusion of harm on Bradfield Manor Farmhouse, which will be submitted in Deadline 1. The Applicant notes Wiltshire Council comments regarding additional visualisations and will produce visualisations in line with requests in the relevant representations submitted by Historic England and submit at Deadline 1.

WC-150	Cultural Heritage	Built Heritage	12.10. The council's Conservation Officer agrees that the following could enhance confidence in the final assessment: • Upper-storey views from the farmhouse (especially the three-storey parlour block) – currently acknowledged but not fully analysed. • Photomontages or wireframes from key viewpoints would help illustrate intervisibility and support the conclusion of "less than substantial harm." • Discussion around seasonal variation and length of time to reach maturity (e.g. leaf-off conditions) should be modelled to assess screening effectiveness year-round. The section suggests that the proposed 'woodland block' mitigation will only be effective in screening views of the BESS at maturity circa 15 years.	The Applicant notes Wiltshire Council comments regarding additional visualisations and will produce visualisations in line with the relevant representations submitted by Historic England and submit at Deadline 1. The Applicant welcomes a discussion with Wiltshire Council on seasonal variation and timescale for landscape mitigation to reach maturity. The **Outline Landscape and Ecological Management Plan [APP-283]**, sets out a framework for the planting, management and monitoring of landscaping mitigation, which is proposed as part of embedded mitigation for built heritage assets.
WC-151	Cultural Heritage	Built Heritage	12.11. Furthermore, it is noted that the embedded mitigation proposed is generally extensive and includes: • Removal of panels from sensitive fields. • Setbacks and offsets from PRoWs and hedgerows. • Landscape screening and hedgerow/individual tree reinforcement. • Construction traffic routing to avoid roadside heritage features.	The Applicant welcomes the Council's acknowledgement of the embedded mitigation proposed.

WC-152	Cultural Heritage	Built Heritage	12.12. Additional mitigation is not proposed for built heritage, and this seems reasonable given the low level of residual harm. However, dependent on the final assessments noted above, further refinement may be required for Bradfield Manor where additional screening or layout changes could be explored to reduce visibility from upper floors. 12.13. The council's Conservation Officer also suggests that additional mitigation could be considered to limit the impact of the Highway Improvement Area on the character and appearance of Rodbourne Conservation Area. This might include commitments to reinstatement of the rural character of the track and junction following construction or, if similar vehicular access is required during the operational phase, at decommissioning. 12.14. However, a general omission is the lack of provision for mitigation monitoring and adaptation. While mitigation is well described (e.g. woodland belts, hedgerow enhancement), there is no plan for: • Monitoring effectiveness post-construction, or • Adaptive management if screening proves insufficient.	The Applicant notes the Council's comments. The **Outline Landscape and Ecological Management Plan [APP-283]**, sets out a framework for the planting, management and monitoring of landscaping mitigation, which is proposed as part of embedded mitigation for built heritage assets, with scope for adaptive management over the lifetime of the Scheme informed by monitoring outcomes. Given the low level of residual harm identified, additional mitigation for built heritage is not currently considered necessary. However, the Applicant will discuss this issue with Wiltshire Council.

WC-153	Cultural Heritage	Built Heritage	12.15. With regard to the assessment for cumulative / in-combination effects, the assessment methodology and need for professional judgement were discussed post statutory consultation stage and the cumulative assessment now appears proportionate: • It considers intervisibility, setting, and temporal overlap with nearby developments. • The ES, Vol 1, 6.1 Chapter 12: Cultural Heritage [APP-064] concludes that no significant cumulative effects arise for built heritage assets. • The in-combination assessment with other environmental topics (e.g. noise, landscape) finds no new or greater effects. 12.16. Therefore, this conclusion is supported by the evidence and consultation responses.	The Applicant notes Wiltshire Council's comment that the conclusions referred in respective of the cumulative and in-combination effects on built heritage assets are supported by evidence and consultation responses.
WC-154	Cultural Heritage	Built Heritage	12.17. Furthermore, it is considered that the residual effects are appropriately assessed: • For built heritage, residual effects are Neutral to Minor / Moderate Adverse, and not significant in EIA terms. • The ES Vol 1, 6.1 Chapter 12: Cultural Heritage [APP-064] clearly distinguishes between EIA significance and NPS-defined harm and uses professional judgement to reconcile the two. • The mitigation measures are generally sufficient to reduce impacts to an acceptable level. 12.18.	The Applicant welcomes the Council's agreement that residual effects are appropriately assessed and mitigation is generally sufficient. The Applicant will produce visualisations relating to Bradfield Manor Farmhouse in line with relevant representations submitted by Historic England for submission in Deadline 1. Given the low level of residual harm identified in respect of the additional mitigation for built heritage is not currently considered necessary. However, the Applicant will discuss this issue with Wiltshire Council

			However, further details remain to be provided to allow more certainty in respect of the final impact on Bradfield Manor. Also, in the instance of the Setting of Rodbourne Conservation Area, the council's Conservation Officer suggests that additional mitigation could be beneficial post-construction phase to reinstate the rural / agricultural character of the track access to Lime Down Site E and limit the impact on the rural character and appearance of the approach to the conservation area, as this is of importance to its significance.	

WC-155	Cultural Heritage	Built Heritage	12.19. It is noted that the outline construction strategies etc., do not include specific references to the built historic environment over and above the provision of the proposed embedded mitigation as no additional mitigation is proposed. Whilst, the council has no objection to this approach, as noted above, provision should be made for mitigation monitoring and adaptation. This should include monitoring effectiveness post-construction and / or adaptative management, if screening provides insufficient. 12.20. The outline Construction Traffic Management Plan (oCTMP) (7.22) [APP-287] identifies the potential issue for built heritage assets as being the risk of swipes and strikes to assets located directly adjacent to roads. Routes have been designed to minimise potential for impact and the oCTMP includes provisions for monitoring and mitigating the impact of construction traffic on the local highway network and adjacent heritage assets. However, clarity is required as to how any issues will be picked up and resolved if or when they occur. 12.21. Whilst it is noted that the oCTMP doesn't explicitly refer explicitly and separately to heritage asset protection, the following measures would indirectly protect roadside features: • Historic kerbs and designated milestones are to be avoided during construction traffic movements; • Any temporarily removed street furniture will be reinstated;	The Applicant notes Wiltshire Council's comments. Regarding provision for mitigation monitoring and adaptation, the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]** already provides for ongoing monitoring of planting and ecological mitigation, replacement planting where establishment fails, and the preparation of a detailed LEMP to be secured through the DCO. Given the low level of residual harm identified in respect of the additional mitigation for built heritage is not currently considered necessary. However, the Applicant will discuss this issue with Wiltshire Council. The Applicant notes Wiltshire Council comment that that the protection for built heritage will be maintained and addressed in an appropriate manner without requirement for additional provisions through the DCO for the Scheme. The Applicant considers that the information on construction issues is sufficiently clear and detailed. The Outline Construction Traffic Management Plan (oCTMP) sets out the mechanism by which construction traffic issues would be identified, logged and addressed, including through the Site Manager and liaison with the relevant highway authority where remedial measures are necessary (see

			• Vegetation management (e.g., trimming to maintain visibility splays) is planned with sensitivity to ecological and heritage contexts. 12.22. Within the draft DCO, it is noted that there are no designated or non-designated built heritage assets within the limits of the Order itself, and it is assumed that this would be the same for the cable connection route when finalised. Therefore, the risk to built heritage is less than some of the other issues being considered. The draft DCO does, however, allow for development that may have some indirect impacts on assets nearby, particularly through changes to setting, views and construction-related disturbance. 12.23. These are intended to be addressed through: • Environmental mitigation secured via the Landscape and Ecological Management Plan (LEMP) [APP-283]; and the • Design Principles and Parameters (7.4) [APP-269) 12.24. The draft DCO ensures that the council, as LPA, will retain approval rights over key documents. 12.25. There is no disapplication of heritage legislation proposed via the draft DCO (i.e. the protective measures included within the Planning (Listed Buildings and Conservation Areas) Act 1990) and any direct impact on listed buildings or conservation areas would require separate consent. For example, in the case of a requirement to move a listed milestone to facilitate access or in	Section 6.14). A final CTMP will be approved prior to construction, securing detailed monitoring arrangements and clear lines of responsibility.

			the event of the need for repairs to a building harmed during the transport of large loads through the surrounding area. There also seems to be provisions included for making good any damage to boundary landscaping etc. on adjacent private land, should this be harmed. 12.26. On this basis, it seems that the protection for built heritage should be maintained and addressed in an appropriate manner without requirement for additional provisions.	

WC-156	Cultural Heritage	Archaeology	Policy Considerations 13.1. To date, the archaeological consultants to the Applicant have mostly complied with planning policy requirements in that they have presented well-produced desk-based assessment documents, along with reports on the results of geophysical surveys and trial trench evaluations. However, the report on the trial trenching is yet to be fully completed, with only summary reports presented to date. A full report on the results of the trial trenching will be required during the course of the examination and prior to the determination of the application by the Secretary of State.	The Applicant notes the Council's comments. Interim trial trenching reports were submitted as part of the **DCO Application [APP-225 to APP-229]** and full trial trenching reports will be submitted, in advance of determination of the Application by the Secretary of State at Deadline 2.
WC-157	Cultural Heritage	Archaeology	Environmental Assessment Considerations 13.2. Much of the documentation that has been submitted regarding archaeology covers work that Wiltshire Council Archaeology Service (WCAS) has already considered and approved. This includes the Desk-Based Assessments for the solar farm itself and the cable route, along with the subsequent geophysical survey of both the solar farm and the cable route, together with the trial trench evaluation of the solar farm. To this end, WCAS have no comment to make on these documents beyond the previous feedback that has been submitted, which is to approve the desk-based assessments and to welcome the results of the geophysical survey of the solar farm that has added significantly to the council's knowledge	The Applicant notes the Council's comments. An interim geophysical survey report of the Cable Route Corridor was submitted as part of the **DCO Application [APP-223 to APP-224]** and a report covering the geophysical survey of the cable route corridor will be submitted, in advance of determination of the Application by the Secretary of State at Deadline 2.

			of the later prehistoric and Roman periods in this part of the county. The geophysical survey of the proposed cable connection route will need to be completed, and a report submitted to WCAS for review and approval prior to approval of the scheme.	
WC-158	Cultural Heritage	Archaeology	13.3. Based on the results of the fieldwork that has been carried out to date, WCAS consider that, while there are many significant areas of archaeological activity, there are no heritage assets located within the solar park or the proposed cable connection route that would prove to be an overriding constraint to the development, subject to an agreed programme of archaeological mitigation. The impact of the scheme upon those archaeological sites that have been identified will be mitigated either via scoping out of the scheme altogether, or via archaeological excavation, or via non-intrusive construction methodologies. To this end, WCAS concur with the conclusion in Table 22-1 Summary of Significant Residual Effects in ES Vol 1, 6.1 Chapter 22 Summary of Residual Effects [APP-074] that 'No significant residual effects on cultural heritage are predicted during the construction of the Scheme'.	The Applicant welcomes the Council's confirmation that no overriding archaeological constraints are identified, and that it concurs with the conclusion in Table 22-1 Summary of Significant Residual Effects in **ES Volume 1, 6.1 Chapter 22 Summary of Residual Effects [APP-074]** that 'No significant residual effects on cultural heritage are predicted during the construction of the Scheme'.

WC-159	Cultural Heritage	Archaeology	13.4. WCAS are pleased to note that two archaeological sites, namely B12-01 and D6-01 will be scoped out of the development (Table 22-2 Summary of Significant Residual Effects (Operation and Maintenance) [APP-074]. However, if further sites can be scoped out of the proposed development area, then this would be regarded as the ideal mitigation strategy and is something that the council will be trying to secure during the examination.	The Applicant notes WCAS's comment. The Applicant considers the proposed mitigation to be appropriate and sufficient, as such no further scoping out of sites is proposed.
WC-160	Cultural Heritage	Archaeology	13.5. It is noted that Table 22-3 Summary of Significant Residual Effects (Decommissioning) [APP-074] states that: 'No significant residual effects on cultural heritage are predicted during the decommissioning of the Scheme.' As decommissioning is many decades in the future, WCAS cannot see how such a statement can be made with any confidence. While the ES, Vol 3, 6.3 Appendix 12-6 Outline Archaeological Mitigation Strategy [APP-230] makes hopeful statements regarding agreeing a suitable strategy between future parties, it is unclear as to who these bodies will be and what powers they will have to enforce any future strategies. As a result, WCAS would prefer to see a more neutral statement here that reflects these uncertainties. 13.6. A significant amount of sub-surface archaeological remains will be impacted by the scheme and many have been discovered during the evaluation phase. Progress is being made on agreeing a	The Applicant notes Wiltshire Council's comments. As stated in Section 12.4 of **ES Volume 1, Chapter 12: Cultural Heritage [APP-064],** the Applicant notes that there may be some uncertainty regarding decommissioning as engineering approaches and technologies are likely to change over the operational life of the Scheme. As stated in paragraph 12.8.13 of **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]** it is not envisaged that there would be any further impacts to archaeological remains beyond that experienced during the construction phase and any impacts would occur within the footprint of used during the construction phase. If additional unexpected impacts are identified during the decommissioning phase an assessment would be required to identify the extent of impact and appropriate mitigation in line with **Outline Decommissioning Strategy [APP-279]**. Accordingly, the Applicant

			programme of mitigation for these remains. However, there is a significant amount of outstanding information that WCAS requires before the determination of this proposed development, and before the council are satisfied with a final mitigation strategy. This information includes the full geophysics results, the final evaluation report and a detailed DAMS.	does not propose to make the requested amendment. Interim trial trenching reports were submitted as part of the **DCO Application [APP-225 to APP-229]** and full trial trenching reports will be submitted, in advance of determination of the Application by the Secretary of State at Deadline 2. An interim geophysical survey report of the Cable Route Corridor was submitted as part of the **DCO Application [APP-223 to APP-224]** and a report covering the geophysical survey of the cable route corridor will be submitted, in advance of determination of the Application by the Secretary of State at Deadline 2. It should be noted that the detailed Scheme design will be developed post consent of the DCO Application, and that without a detailed design it is not possible to produce a Detailed Archaeological Mitigation Strategy (DAMS). The Applicant highlights that an Outline AMS is a standard document that is submitted as part of Solar DCO schemes, as evidence by the consented Cottam and West Burton schemes, and site specific WSIs will be appended to the Outline AMS in advance of each phase of mitigation works. Where a DAMS has been produced to support a DCO Application, this is typically on developments where a detailed design is submitted with the DCO Application (i.e. road schemes).
WC-161	Cultural Heritage	Archaeology	Draft DCO and Control Document Considerations	The Applicant acknowledges WCAS's comments. The Applicant confirms that

			13.7. A final and detailed report on the trial trenching of the solar park is yet to be presented to WCAS for review and approval. WCAS would expect to reach this stage before considering any work to mitigate the likely impacts of the proposals upon the archaeological resource. A report on the geophysical survey of the cable route is also awaited. WCAS would therefore wish to see the full and final version of both the evaluation report and the geophysical survey of the cable route submitted to, and approved by, WCAS prior to the determination of the application. 13.8. The Applicant's archaeological consultants, Lanpro, have produced a document entitled Outline Archaeological Mitigation Strategy [APP-230], which is based on the preliminary results of the trial trenching and the partial results of the geophysical survey of the cable route. WCAS are concerned that a Detailed Archaeological Mitigation Strategy (DAMS) has not been submitted as part of the DCO application with the supporting documentation. Whilst it is realised that this is the result of the incomplete nature of the trial trench report and the geophysical survey of the cable connection route, it is vital that a DAMS is submitted and approved by WCAS prior to the determination of the application. Therefore, the completion of the report and the survey is paramount at this stage.	the full trial trenching report and geophysical survey results for the cable route will be submitted into Examination at Deadline 2. As stated in Paragraph 1.1.2 of the **Outline AMS [APP-230]**, the Outline AMS provides an overarching methodology for undertaking a programme of archaeological mitigation within the Scheme. Written Schemes of Investigations (WSIs) that detail site-specific mitigation measures will be appended to the Outline AMS in advance of each phase of mitigation works. It is intended that these WSIs will include information regarding the programme of archaeological investigation for on-site and off-site work (including analysis, publishing and archiving of the results) as well as public engagement plans, and will be approved by Wiltshire Council prior to their implementation. This approach is a common approach adopted on other consented solar DCO schemes such as Cottam and West Burton. It is secured by Requirement 12 of the draft **Development Consent Order [APP-016]** which states that no part of the Proposed Development can commence until the WSI for that part has been submitted to and approved by Wiltshire Council as the relevant planning authority. The WSIs must be substantially in accordance with the Outline AMS and must be implemented as approved.

				The Outline AMS has been drafted with consideration to the indicative Scheme design submitted with the DCO application for the Scheme (see the indicative site layout plan **[APP-081]**). It should be noted that the detailed Scheme design will be developed post consent of the DCO Application, and that without a detailed design it is not possible to produce a Detailed Archaeological Mitigation Strategy (DAMS). The Applicant highlights an AMS is a standard document that is submitted as part of Solar DCO Schemes, as evidence by the consented Cottam and West Burton Schemes, and site specific WSIs will be appended to the Outline AMS in advance of each phase of mitigation works. Where a DAMS has been produced to support a DCO Application, this is typically on developments where a detailed design is submitted with the DCO Application (i.e. road schemes). As detailed in Table 12-2 of **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, the Applicant has undertaken thorough consultation with the Wiltshire Council Archaeological Officer and will look to discuss comments on the Outline AMS with a view to updating the Outline AMS where necessary and appropriate.
WC-162	Cultural Heritage	Archaeology	13.9. The Outline Mitigation Strategy [APP-230] states that there are three proposed mitigation responses. • Scoping complex archaeological sites out of the development altogether, • Strip, Map and Record excavations of	The Applicant notes this comment.

			significant and sensitive sites • 'Non-intrusive' construction methodologies to avoid impacting archaeological sites and features	
WC-163	Cultural Heritage	Archaeology	13.10. WCAS welcome the scoping out of as many archaeological sites that have been identified by the geophysical survey as possible. If this can be extended to other sites following review of the available data, then this should be encouraged. WCAS also wish to see Archaeological Management Plans (AMPs) submitted, ether by the archaeological consultants to the Applicant, or the archaeological contractors on the ground. The AMPs will set out methodologies to be followed to protect archaeological sites during the construction, operational and decommissioning phases of the proposed development. These AMPs will have to be reviewed and approved by Wiltshire Council and secured via condition.	The Applicant notes WCAS's comment. The Applicant considers the proposed mitigation to be appropriate and sufficient, as such no further scoping out of sites is proposed. As stated in Paragraph 1.1.2 of the **Outline AMS [APP-230]**, the Outline AMS provides an overarching methodology for undertaking a programme of archaeological mitigation within the Scheme. The Outline AMS details the methodologies to be followed to protect archaeological sites during the construction, operational and decommissioning phases of the proposed development and is secured through Requirement 12 of the DCO. The Applicant will discuss the need for the production of AMPs with WCAS's.
WC-164	Cultural Heritage	Archaeology	13.11. Strip, Map and Record (SMR) excavations are required by WCAS. The precise methodologies to be employed by these investigations need to be established in the DAMS and in the Site-Specific Written Schemes of Investigation (SSWSIs) that will need to be prepared ahead of each excavation. The creation of SSWSIs is discussed in Section 14 of this document, but it is unclear who will prepare them. The SSWSIs will need to be approved by	As stated in Paragraph 1.1.8 of the **Outline AMS [APP-230]**, the Outline AMS includes for mitigation in the form of preservation of archaeological remains in situ, 'strip, map and sample', and archaeological monitoring. As stated in paragraph 1.1.3 of the **Outline AMS [APP-230]**, Written Schemes of Investigations (WSIs) that detail site-specific mitigation measures will be appended to the Outline AMS in advance of each phase of mitigation works. It is intended that these WSIs

			the WCAS, and it needs to be made clear which organisation will be preparing and submitting these. WCAS have assumed that Lanpro see this as their role, although the council would insist that the appointed archaeological contractor (who is carrying out the fieldwork) produce them. SSWSIs will then need to be reviewed and approved by WCAS prior to the commencement of work.	will be approved by Wiltshire Council prior to their implementation. The Applicant notes WCAS comments regarding the authorship of WSIs. The Applicant will look to discuss comments on the AMS with WCAS and will update the AMS where necessary and appropriate.
WC-165	Cultural Heritage	Archaeology	13.12. The 'non-intrusive' methodologies are not discussed in detail in the document, although they seem to be divided between the careful positioning of panels away from isolated features such as ring ditches, enclosure ditches and field boundaries, or the use of concrete feet, set upon topsoil. WCAS are not in favour of the latter as it is considered that is too much risk for impacts upon sub-surface archaeology from construction directly over it without suitable mitigation. WCAS would wish to see panels located away from features in these circumstances so that any impact can be avoided. The precise nature of 'non-intrusive' mitigation will need to be determined on a site-by-site basis during the preparation, review, and approval of the SSWSIs.	The Applicant acknowledges WCAS's comments. The Applicant is committed to continuing discussions on the appropriate types of non-intrusive mitigation, including options such as localised piles to avoid impacting archaeological remains.

WC-166	Cultural Heritage	Archaeology	13.13. As noted above, the cable connection route has only been partially investigated by a geophysical survey due to land access issues. It is stated the remainder of the survey will be carried out this autumn (which has already passed) and a DAMS will need to be prepared once this work has been completed. It is therefore problematic to comment on the cabling strategy when much of the data is still to be assembled, and mitigation targets identified. This situation is reflected in the rather nebulous mitigation programme put forward for this part of the proposed development, although the commitment to SMR excavations of significant sites is welcomed. The proposed option of directly drilling beneath the most significant sites may be appropriate in some circumstances, but this option will need to be explored in more detail.	The Applicant notes WCAS comments and confirms that the full geophysical survey of the cable connection route will be submitted into Examination at Deadline 2, once completed. The **Outline AMS [APP-230]** provides an appropriate and proportionate framework for managing archaeological impacts. The proposed approach to cabling, including the potential use of horizontal directional drilling (HDD), will be considered in detail, with further discussion on HDD and other mitigation approaches to continue through the examination process. See comments above regarding DAMS and the site specific WSIs.
WC-167	Cultural Heritage	Archaeology	13.14. Regarding specific paragraphs in the Outline Mitigation Strategy [APP-230]: • Paragraph 5.1.3 – WCAS would wish to see their own document 'Standards and Guidance for Archaeological Assessment and Fieldwork in Wiltshire and Swindon Borough' included among the standards used to prepare SSWSIs. • Paragraph 7.7.2 – WCAS notes and welcomes the statement where the Outline Mitigation Strategy commits the archaeological contractor to excavating all archaeological deposits and fills down to the natural substrate. • Paragraph 7.11.1 – WCAS welcomes	The Applicant will look to discuss comments on the Outline AMS with WCAS and will update the **Outline AMS [APP-230]** where necessary and appropriate.

			the commitment to a continuous review of strategies to be followed on site. • Paragraph 7.11.4 – The document states that Lanpro and the appointed archaeological contractor can determine if an on-site strategy is unsuitable and if it can be changed or adapted. WCAS should be the body that can instigate, and will determine the need for, such reviews. • Paragraph 11.1 – Before any site archives are deposited with a receiving museum, a written commitment must be given in the SSWSI for the archaeological contractor, the consultant or their client to meet any box fees required by the receiving museum.	

WC-168	Cultural Heritage	Archaeology	13.15. WCAS also require revisions to Table 6.1.1: Archaeological Mitigation Strategies [APP-230]: • A7-01 – A SMR excavation will be required for this site • Sites B6-01 and B9-01 appear to be very similar, only the former has been earmarked for non-intrusive works, while the latter has been marked for SMR excavation. Clarity is required on why these two sites are seen differently • C5-01 – A SMR excavation will be required for this site • C30-01 – A SMR excavation will be required for this site • C11-01 – A SMR excavation will be required for this site • C36-02 – A SMR excavation will be required for this site • C14-01 – This ring ditch should be avoided altogether, or a SMR excavation should be carried out • C13-01 – There is no need for a SMR excavation here • D20-01 – This site is not a ring ditch as described in Table 6.1.1, it is a square enclosure • D1-02 – No information has been provided on this site • D3-01 – This ring ditch should be avoided altogether, or a SMR excavation should be carried out • D6-01 – A SMR excavation will be required for this site • D6-02 – A SMR excavation will be required for this site • E14-01 – This ring ditch should be avoided altogether, or a SMR excavation should be carried out	The Applicant will look to discuss comments on the Outline AMS with WCAS and will update the **Outline AMS [APP-230]** where necessary and appropriate.

			• E14-02 – A SMR excavation will be required for this site • E20-01 – This ring ditch should be avoided altogether, or a SMR excavation should be carried out.	
WC-169	Cultural Heritage	Archaeology	13.16. Additionally, a written programme of archaeological investigation, which should include on-site and off-site work such as the analysis, publishing and archiving of the results, should be submitted to and approved by the Local Planning Authority. 13.17. Furthermore, WCAS will require a document to be prepared that commits the Applicant to, and sets out a methodology and timetable for, a programme of public engagement and educational events to run in tandem with the mitigation works. This is due to the amount of archaeological mitigation	As stated in paragraph 1.1.3 of the **Outline AMS [APP-230]**, Written Schemes of Investigations (WSIs) that detail site-specific mitigation measures will be appended to the Outline AMS in advance of each phase of mitigation works. It is intended that these WSIs will include information regarding the programme of archaeological investigation for on-site and off-site work (including analysis, publishing and archiving of the results) as well as public engagement plans, and will be approved by Wiltshire Council prior to their implementation. This approach and the **Outline AMS**

			works that will be required, and to contribute to the publication benefit of the development (NPPF paragraph 218). This document will need to be approved by WCAS and secured by condition.	**[APP-230]** is secured by Requirement 12 of the **Draft DCO [APP-016]**.
WC-170	Transport and Access	Draft DCO Provisions	14.1. The following statement provides a summary of the main highway concerns with the Draft DCO provisions and potential network impacts associated with the increased HGV trafficking during the construction phase. 14.2. The detailed review of individual application documents is contained in Appendix A.	The Applicant notes this comment.
WC-171	Transport and Access	Draft DCO Provisions	Draft DCO Provisions 14.3. The council's Highways Development Management officer remains concerned over the ability of the Council to control works being undertaken within the public highway, notably its normal powers to assure that proposed site access and other construction works will meet the council's adoptable standard. In the Applicant's response to the council's comments on the Draft DCO, it is stated in response to the need for s278 Agreement and due	The current drafting is appropriate as Article 15 applies to street authorities and therefore includes all private roads. "*May*", as opposed to "*will*", is required here as it would be inappropriate to require an agreement to be entered into in relation to all private streets. Detailed design drawings and Stage 2 Road Safety Audits will be provided as part of the Technical Approval process as a requirement of the DCO. **The OCTMP [APP-287]** will be updated to confirm this and submitted at Deadline 1 of Examination.

			process in respect of Article 10 that: "*A separate agreement will not be necessary as the undertaker's powers relating to the alteration of streets are conveyed by Article 10 of the DCO as opposed to the Highways Act 1980 ("HA 1980"). Any agreement with the street authority would therefore be pursuant to Article 15 of the DCO and not section 278 of the HA 1980. It should be noted however that Article 15 and section 278 address the same aspects of design approval, bond and sign off*". However, review of DCO Article 15 states in (1) that "*A street authority and the undertaker may enter into agreements*". The concern is the use of the word 'may', which suggests that the undertaker is not bound or required to do so. 14.4. Article 10(4) [APP-016] further states that "*The powers conferred by paragraph (2) may not be exercised without the consent of the street authority, such consent to be in a form reasonably required by the street authority*". It is the council's Highways Development Management officer's view that the form of consent should include the council's 'requirement' for an agreement under Article 15, with clause provision within this of similar form to the council's standard s278 agreement template.	

WC-172	Transport and Access	Draft DCO Provisions	14.5. Article 14 implies that approval by the highway authority is only required for new access locations proposed beyond those set out in Schedule 7, Parts 1 and 2 [APP-016]. In short, all the accesses in Schedule 7, whether permanent or temporary, are seemingly deemed approved in at least principle under powers conferred in Article 14. The Applicant's response to the request for an amendment to require technical approval by the Council stated: "*Technical approval by the Council is not required as the permanent and temporary means of access set out in Part 1 and Part 2 of Schedule7 respectively are approved by Article 14. Access works however would be secured through the discharge of the Construction Traffic Management Plan ("CTMP") via Requirement 15 which requires approval from the Council prior to the commencement of the Scheme*". Section 2.3 of the OCTMP [APP-287] 'Detailed Design' states in part that: "*Prior to carrying out a work to the public highway, the detailed design of such works must be submitted to the highway authority for approval*". This goes on to say that this will include, in part, a construction programme for the works, a method statement, any traffic management proposals, detailed technical drawings and a Stage 1-2 RSA. Whilst this is welcomed, it is not considered a substitute for 'requiring' bespoke highway agreements under Article 15 of the DCO for 'all' works undertaken within the public highway.	The Council's interpretation of article 14 is correct. The accesses listed in Schedule 7 are permitted by virtue of the DCO and do not require any further consent from the highway authority. The physical laying out of the accesses is carried out pursuant to the power in article 10 (power to alter layout, etc., of streets) and controlled by provisions in the **OCTMP [APP-287]**. Detailed design drawings and Stage 2 Road Safety Audits will be provided as part of the Technical Approval process as a requirement of the DCO. The **OCTMP [APP-287]** will be updated to confirm this and submitted at Deadline 1 of Examination. Matters such as the amount of any bond or indemnity requirements would be managed as part of an agreement entered into under article 15 of the DCO, in the same way that these matters would typically be specified in a s278 agreement.

			These agreements should subsume the technical approval requirement of all drawings and allied documentation for the design of the permanent highway works anyway, which should not be a CTMP matter. Furthermore, formal agreements are needed to additionally be put in place, for example, Bond requirements, suitable indemnity provision for Wiltshire Council against claims arising from the undertakers works on the highway and provision for Wiltshire Council inspection / works sign-off during construction including supervision fees. None of that is covered in the oCTMP.	
WC-173	Transport and Access	Construction Routes	14.6. ES Vol 1, 6.1 Chapter 3 The Scheme [APP-055] and expressly paragraphs 3.3.7.2 and 3.3.7.3 under 'Highway Improvements Areas' (HIA) state that: "*Highway improvements will be made to facilitate construction. The Highway Improvement Areas are shown in ES Volume 2, Figure 3-2: Key Construction Phase Features [EN010168/APP/6.2])*" and "*Works within the Highway Improvement Areas comprise modifications to the existing highway such as improvements to road edge where it is deteriorated, minor works to enable construction vehicle movements such as provision of passing places within the existing highway boundary, traffic management measures and provision of visibility splays*". However, these HIA subsumed within Works Numbers 8A or 8B appear to exclude any deemed need for improvements along key minor road lengths providing	For an explanation to why Works Numbers 8A or 8B exclude improvements to minor road lengths providing primary access to Lime Down Sites A-C and D please refer to the Applicant's responses to Paragraph 14.7, 14.8 and 14.9 below for further detail regarding construction traffic movements and highway improvements associated with the Scheme. Final details of mitigation within the Highway Improvement Areas will be submitted as part of the Technical Approval process as part of the **OCTMP [APP-287]**, which is secured by a requirement of the DCO.

			primary access to Lime Down Sites A-C and D.	
WC-174	Transport and Access	Construction Routes	14.7. Annex H to the ES Vol 3, 6.3 Appendix 13-1 Transport Assessment [APP-233] shows the 'Construction Route Swept Path Analysis' for all the minor road lengths serving as HGV construction routes. These show the swept path analysis 'passage' for a 16.5m articulated HGV and an estate car. Examination of the Lime Down Site D access route between Dyson Roundabout and Bradfield Cottages indicates that the existing carriageway width is, for the most part, only able to pass an HGV and a car. Furthermore, parts of the route do not even accommodate this, requiring one driver to wait in a suitable location to allow passage of the other through the 'narrowed' sections. Some of these restricted passage sections appear quite long, as indicated by the intervisibility distances shown between passing points. No part of the route has been assessed for passing opportunity	The assessment presented in Annex H of **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]** demonstrates adequate carriageway width or frequency of passing place opportunity to pass at least an HGV and a light vehicle as requested in comments provided by Wiltshire Council in its response (August 2025) to the Transport Assessment Scoping Note and confirmed in Paragraph 4 of 'Appendix A - Highways and Transport Document Review - Detailed Comments'. This confirms that no passing bay or widening improvements are needed to accommodate these movements on the construction route outside of the Order Limits. The distances between passing points outside of the Order Limits are all within 150 m with forward visibility extending to the next passing point and beyond. This is within the generally accepted distance of 200 metres.

			for two opposing HGVs, which given the level of predicted HGV trafficking associated with Lime Down area D is a very real concern. Table 13-12 in the Transport Assessment (Table 13-20 in the ES) shows a predicted 76 HGV movements per day on this route, whilst background flows at Location 12 'Bradfield Cottages' indicate daily vehicle flows of 1,396 with an HGV content of 3.3% (46). In view of the existing flows and predicted HGV movements during the construction of Lime Down D it cannot be assumed that a need for 2-way HGV passage will not be needed along this length of access route, or indeed that this will be an infrequent occurrence despite best efforts in coordinating the timings for arriving and exiting HGVs.	As set out in the **OCTMP [APP-287]**, a booking system will be set up to manage arrivals and departures to the Order Limits. This will be implemented in coordination with banksmen, which will be able to hold back any cross-over, should there be any delays on the roads. This will prevent HGVs generated by the Scheme passing each other in opposite directions on the local roads forming part of the construction routes and will be confirmed as part of the final CTMP. In response to paragraph 14.7, excessive widening of existing rural routes to allow two HGVs to pass would be over engineering, because of the following reasons: • Temporary nature of the construction period; • Trip generation of 76 hgvs on the route to Lime Down D is an estimate of the deliveries on a peak day, so does not represent a daily average; • Trip generation of 76 hgvs on the route to Lime Down D is based on the worst-case assumptions, including but not limited to, all phases and Solar PV Sites being constructed simultaneously and a 50% uplift; • Average number of HGV construction movements along the route to Lime Down D is only 50 per day/7 per hour/one
WC-175	Transport and Access	Construction Routes	14.8. The same HGV / car swept path analysis is presented for the access route between Fosse Way and Lime Down Site A. Whilst the expected daily HGV movements associated with Lime Down Site A and background HGV flows along this length of minor road are much reduced, it would still be useful to understand what level of constraint exists to 2-way HGV passage.	

WC-176	Transport and Access	Construction Routes	14.9. Finally, HGV / car swept path passage analysis are presented for Alderton Road and Fosse Way, noting the former and a part of Fosse Way is indicated as a Highway Improvement Area. However, it remains unclear what improvement works are proposed based on the analysis. It is again noted that significant parts of the route sections are narrow and unable to pass an HGV / car, so relying on opposing driver inter-visibility through the lengths of narrowing. Given this part of the highway network will be required to accommodate the HGV trafficking associated with Lime Down Sites A-C, there is a concern that no assessment has been done to consider passage opportunities for two opposing HGVs. Some of the inter-visibility distances measured between possible passing points are quite long and, in some cases, up to 215m, which is a concern albeit the alignment being relatively straight for the most part along Fosse Way. Fosse Way typically has flat mown verges either side of its relatively narrow carriageway, so the risk of over-run damage with only moderate levels of increased HGV trafficking could be significant. However, as no analyses examining 2-way HGV passage opportunity has been undertaken, it is not currently known whether two HGVs could pass anywhere along the length of Fosse Way without over-riding / damaging the grass verges.	every 8 minutes (less than the journey time along the route); - assuming a realistic construction programme, the average number of HGV construction movements along the route to Lime Down D is only 32 per day/5 per hour/one every 13 minutes (less than the journey time along the route); • Delivery times during the construction phase are limited to those times set out in the **OCTMP [APP-287]**. There will be no HGV construction trips outside of these hours; • There would be a much greater impact on hedgerow, trees and character; and • Low level of existing hgvs on the route to Lime Down D (average number of existing HGV movements is only 46 per day, with some of these movements occurring outside of proposed construction hours set out in the **OCTMP [APP-287]**) In response to Paragraph 14.8, excessive widening of existing rural routes to allow two HGVs to pass would be over engineering, because of the following reasons: • Temporary nature of the construction period; • Trip generation of 16 hgvs on the route to Lime Down A is an

				estimate of the deliveries on a peak day, so does not represent a daily average; • Trip generation of 16 hgvs on the route to Lime Down A is based on the worst-case assumptions, including but not limited to, all phases and Solar PV Sites being constructed simultaneously and a 50% uplift; • Average number of HGV movements along the route to Lime Down A is only 10 per day/less than 2 per hour/one every 42 minutes (less than the journey time along the route), with the construction phase for Lime Down Site A only lasting 9 months • Delivery times during the construction phase are limited to those times set out in the **oCTMP [APP-287]**. There will be no HGV trips outside of these hours; • Impact on hedgerow, trees and character; and • Low level of existing hgvs on the route to lime down a (average number of existing HGV movements is only 40 per day, with some of these movements occurring outside of proposed construction hours set out in the **oCTMP [APP-287]**)

				In response to Paragraph 14.9, excessive widening of existing rural routes to allow two HGVs to pass would be over engineering, because of the following reasons: • Temporary nature of the construction period; • Trip generation of 50 hgvs on the route to lime down a-c is an estimate of the deliveries on a peak day, so does not represent a daily average; • Trip generation of 50 hgvs on the route to lime down a-c is based on the worst-case assumptions, including but not limited to, all phases and solar pv sites being constructed simultaneously and a 50% uplift; • Average number of hgv construction movements along the route to lime down a-c route is only 32 per day/7 per hour/one every 8 minutes (less than the journey time along the route); • Assuming a realistic construction programme, the average number of hgv construction movements along the route to lime down a-c is only 17 per day/less than 3 per hour/one every 25 minutes (less than the journey time along the route) • Delivery times during the construction phase are limited

				to those times set out in the **oCTMP [APP-287]**. There will be no HGV trips outside of these hours; • Impact on hedgerow, trees and character; and • Low level of existing hgvs on the route to lime down a-c (average number of existing hgv movements is only 20 per day, with some of these movements occurring outside of proposed construction hours set out in the **oCTMP [APP-287]** Further detail of trip generation has also been added to **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]** which will be submitted at Deadline 1 of Examination. To provide further comfort, additional information has been added to **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]** which will be submitted at Deadline 1 of Examination. This demonstrates that there is adequate carriageway width and/or passing place opportunity for two HGVs.

WC-177	Transport and Access	Construction Routes	14.10. In short, the concerns based on the analysis now submitted are firstly potential highway operating and safety issues associated with an inability to pass two HGVs on these minor routes, notably as the existing passing point opportunities have not even been assessed or any mitigation proposed. Secondly, the highway damage consequences of this where verges are regularly over-run, which as the analysis shows, could happen with HGV / car passage along many sections where the carriageway width is inadequate to accommodate even this.	In regard the ability for two HGVs to pass on minor roads, please refer to the Applicant's responses to Paragraph 14.7, 14.8 and 14.9. Final details of mitigation within the Highway Improvement Areas will be submitted as part of the Technical Approval process as part of the **Outline CTMP [APP-287]**, which is secured as a requirement of the DCO.
WC-178	Transport and Access	HGV Volumes	HGV Volumes – Solar Farm Sites (Construction Phase) 14.11. Annex E to ES Vol 3, 6.3 Appendix 13-1 Transport Assessment [APP-233] shows the 'Solar PV Sites Trip Generation Calculations' for the construction phase, so as requested in past comments on the 'Scoping Note', the under-riding assumptions used in determining the HGV types and numbers set out in Table 13-12 in the Transport Assessment (Table 13-20 in the ES). However, the Annex E information shown in respect of HGVs still provides no specific assessed quantities of material volumes and component type / numbers for 'each' Lime Down Site and based on 'average' loadings, how this translates to the predicted HGV numbers and types shown in Table 13.12. The Transport Assessment main text provides no explanatory information on the	A breakdown of Solar PV Sites Trip Generation Calculations is provided at Annex E of **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]**. This presents specific assessed quantities of material volumes and component type/numbers for each Solar PV Site. Further notes have been added for clarity, with an additional breakdown of Trip Generation based on construction phasing. This information will be submitted at Deadline 1 of Examination. In relation to modules and mounting structures, the 1.2 'Ratio' figure represents a reduced loading factor per HGV, based on the difference in size between an HQ and a standard container. The assessments assume standard sized containers, presenting a reasonable-worst case assessment. In practice a majority of modules and mounting structures will be delivered by

			calculations included in Annex E, whilst the spreadsheet printouts themselves provide no notes. The calculations undertaken for Modules and Mounting Structures for each Lime Down Site are set out, but it is unclear what the 1.2 'Ratio' figure used represents but assumed to be a reduced loading factor per HGV. This must be clarified rather than being left to assumption. Aggregate volumes are not determined on a Lime Down site-by-site basis, so are difficult to assess in a confident manner. It is further noted the 'waste' calculation accounts for only removal of packaging, so excludes any allowance for removal of excavated material associated with the construction of the access trackways and the foundation bases for the BESS and 440kV and 132KV substations. This could be a significant amount of off-site disposal of spoil, unless it is being assumed that all excavated material is reused on site or transported offsite as required in the same tippers used for the incoming supply of aggregate. However, nothing is stated so this does need clarifying.	HQ containers, reducing the assumed number of HGVs, with the exception of Lime Down E and the eastern section of Lime Down D, which are accessible via the low bridge on the A429. Aggregate volumes have been assessed on a site-by site basis in accordance with each sites relative size. This is included within the calculations at Annex E to **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]**. There will be no site wide reprofiling required. It has been assumed that any excavated material will be reused on site. In the event of any spoil being taken off site, this will be undertaken by the same tippers used for incoming supply of aggregate. Further clarity has been added to **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]** which will be submitted at Deadline 1 of Examination.

WC-179	Transport and Access	Streetworks	14.12 Under the New Roads and Street Works Act 1991 (NRSWA), a Section 50 Licence is required for the Applicant to place, retain, or work on apparatus in the public highway. This includes activities such as breaking up or opening the street, installing ducts, cables, pipes, or other infrastructure. 14.13 In this case, the Council's Highway Officers have considered the submitted documents have raised the following queries and observations: • 2.2 Land Plan [APP-006]. It is unclear what specific works are being carried out at each highway location. All works on the highway will need to be assessed by the network management team and the appropriate licences and permits approved before any works commence. The level of reinstatement will also need to be agreed. • 2.3 Works Plan [APP-007]. As above, specifics are needed. • 2.4 Streets Plan [APP-008]. Key on drawing states "*street works / street subject to traffic regulation measures*". However, it is unclear exactly what traffic regulation measures are referred to here. • 2.6 Access Plan [APP-010]. It is unclear whether the accesses are temporary, permanent or semi-permanent. Clarity is required as to how long they will be in place. Clarity is also required as to what licence or agreement will be used to allow a vehicle crossover if there is no access already in place. • ES Vol 1, 6.1 Chapter 3 The Scheme [APP-055]. Section 3.4.11 (the	In response to paragraph 14.12, article 8(2) provides the Applicant with a statutory right to carry out street works for the purposes of sections 48(3) and 51(1) of NRSWA. Section 48(3) confirms that, in Part 3 of NRSWA, "*undertaker*" means a person "*by whom the relevant statutory rights is exercisable … or a licensee under a street works licence, as the case may be*". Section 51(1) of NRSWA confirms that is an offence to place apparatus in a street unless in pursuance of a statutory rights or a street works licence. Article 8(2) therefore provides the statutory right for the Applicant to lay cabling forming part of the Scheme (being street works) pursuant to a statutory right, and no separate street works licence is required. The details of these works, including traffic management measures and the programme, will be agreed at the technical approval/detailed design stage. Road space booking will still be required under the Council's permit scheme, which is applied to street works carried out under the DCO by article 9. In response to paragraph 14.13, the land plans set out the extent of compulsory acquisition and temporary possession powers required within the Order Limits. The Works Plans should be read in conjunction with Schedule 1 of the **draft DCO [APP-016]**.

			construction of the joint bays) states "*joint bays would be approximately 20 m by 6 m dependent on ground conditions*". This is extremely large and would require a form of positive Traffic Management, possibly road closures. Clarity is required as to how many of these pits are required on the highway network. • ES Vol 2, 6.2 Figure 2-4-1 to 2-4-9 Public Rights of Way and Highways [APP-080]. (Map showing corridor). It is unclear whether the cable can be placed in the highway where desired. Clarity is required as to whether the appropriate surveys been undertaken to ensure no conflicts with other apparatus. • ES Vol 2, 6.2 Figure 13-2 Study Area: Cable Route Corridor [APP-147]. As per the previous comments above, clarity is required as to what specific works are being carried out at each highway location. All works on the highway will need to be assessed by the network management team and the appropriate licences and permits approved before any works commence. The level of reinstatement will also need to be agreed. Clarity is also required with regards to the construction compounds, and whether the accesses are temporary, permanent or semi-permanent. It is also unclear as to how long will they be in place and what licence or agreement will be used to allow a vehicle crossover if there is no access already in place. • ES Vol 2, 6.2 Figure 13-5 Abnormal Load Routes – Solar PV Sites [APP-	The detail of the traffic regulation measures required in each area will be identified post-consent, and these details will be submitted to the relevant highway authority, as required by the CTMP. Clarity on whether an access is temporary, permanent of semi-permanent is provided in Table 13-19 and Table 13-32 in **ES Volume 1, Chapter 13-1: Transport and Access [APP-065]**. Article 14 of the DCO provides for the creation of these accesses, with any dropped kerb or similar being carried out under article 10 and completed maintained to the satisfaction of the relevant street authority in accordance with article 11. Temporary accesses will be restored to the satisfaction of the street authority under article 10. No separate licence or agreement is required, as the DCO provides the necessary consent for these works, however the design of the accesses will be completed in conjunction with the local highway authority as required by the **Outline CTMP [APP-287]**. In response to the query included at paragraph 14.13 regarding the potential for joint bays to be located within the highway network, the cable route is defined by the Order Limits of the DCO. The majority of this is within fields and it is therefore extremely unlikely that a joint bay would ever be required beneath the highway. The Order Limits provide enough space for a choice of

			150]. Any abnormal loads travelling on the Wiltshire network will need to notify street works and follow Wiltshire Councils abnormal loads procedure. • ES Vol 2, 6.2 Figure 13-9 Traffic Survey Locations: Solar PV Sites [APP-154] and Figure 13-10 Traffic Survey Locations: Cable Route Corridor [APP-155]. Clarity is required on the traffic count results and where they are published. • ES Vol 3, 6.3 Appendix 3-2 Cable Route Construction Method Statement [APP-183]. The construction programme for cabling on the highway will need to be shared with the council's streetworks team. • ES Vol 3, 6.3 Appendix 13-1 Transport Assessment [APP-233]. Any temporary signage for construction traffic will need to be approved by Wiltshire Council area office. • 7.7 Consents and Agreements Position Statement [APP-272]. Wiltshire Council permit scheme must be used to ensure the council can perform our statutory duties and manage the network. • 7.12 Outline Construction Environmental Management Plan [APP-277]. Wiltshire Council will need to see the construction programme for all works on the public highway. Traffic management plans will need to be presented to the streetworks team for approval. • 7.22 Outline Construction Traffic Management Plan [APP-287]. With regards to the new accesses for the cable route corridor, if agreed, these	routing options where it runs along or across the highway network. The normal procedure for AIL deliveries will be followed. This is set out in Section 5.5 of the OCTMP. Traffic counts are included in Annex A of **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]**. Details as to the location of the construction compounds are provided in the **Land Plans [APP-006]** and **Works Plans [APP-007]** under Works Number 5A(v). They are located outside of the Highways extent and will be sited in those locations temporarily for the purpose of construction. All works in private land will be reinstated following completion of the works. Details relating to how the construction areas will be accessed are provided in **ES Volume 1, Chapter 13: Transport and Access [APP-065]**. The design of the access and egress from the highways will be completed in conjunction with the local highway authority as set out within the **Outline CTMP [APP-287]**.

			new accesses must be constructed to Wiltshire Council specification. Any work on the highway will need the necessary permits and / or licences. Furthermore, all traffic management erected on public highway will need to be agreed with the streetworks team prior to use.	

WC-180	Transport and Access	Streetworks	14.14 The council's Highway Officer has also considered the Draft Development Consent Order [APP-016] and makes the following comments: • The council is concerned that the DCO will effectively overwrite genuine concerns at how the Applicant will interact with the council and affect its Network Management Duties under Section 16 of the Traffic Management Act 2004 and the requirements of the Road Traffic Regulation Act 1994. • Under Part 3(8), it appears to suggest a permanent overwriting of existing legislation and duties. The council requires an explanation and / or confirmation that the DCO intends an overwriting of the existing legislation for the entire duration of development's operation. • There does not appear to be any reference in the draft DCO to inspecting the works which are set out in the Streetworks Works (Inspection Fees) Regulations 2022. The highway being worked upon will remain the Council's asset and it must be ensured that it is reinstated to the standards set out in the Specification and Reinstatement of Opening in the Highway (SROH) through inspection. A number of inspection units must therefore be agreed. • Part 3(9) – It is accepted that Section 58 protections will cause problems, but they do not necessarily prevent the works from going ahead, they are used to assist the council in finding an appropriate solution to protect the public purse and the highway asset.	The Planning Act 2008 was enacted as a result of the need for a streamlined consenting regime for infrastructure projects. A key aim of the Planning Act 2008 was to create a 'one stop shop' for all the consents, licences and permits required for a project. The approach to drafting the DCO is extensively precedented, as set out in the Explanatory Memorandum **[APP-017]**. Article 8 (street works) of the draft DCO provides the Applicant with a statutory right to carry out the street works authorised by the DCO, before expressly applying Part 3 of NRSWA to those street works, save where the Applicant is also the street authority for the street in question. Article 9 (application of the permit schemes) applies the Councils' Permit Schemes with minor modifications needed to ensure that it does not constitute an impediment to the implementation of the Scheme. This is considered appropriate to ensure that this critical national priority infrastructure can be delivered without delay. The Applicant notes that the Council may still impose conditions on the carrying out of works under the permit scheme, such as the full width and half width reinstatements mentioned; the article merely restricts the ability to require works to not be carried out for a period under sections 58 and 58A of NRSWA.

			Such work arounds can include full width and half width reinstatements. • Part 3(12) – The draft DCO appears to require a decision on Temporary Traffic Regulation Order (TTRO) applications in 4 weeks. This is considered unreasonably short and conflicts with the national standard and codes of practice for making TTRO's, which is 12 weeks, thereby reflecting the complicated nature of the process. Similarly, there appears to be no capacity to agree a longer period of time if needed. Whilst there may be the opportunity to have these TTRO's brought forward in a shorter timeframe from the national standard (should the network be available and it suits all parties), with the correct planning and agreement on the construction programme, 12 weeks is more than adequate to plan in advance. • Part 3(16) - The provisions set out in this section conflict with existing legislative requirements and set unreasonably short timescales for measures of publicity and agreement.	The Council's comments referring to "*Part3(12*)" and *"Part 3(16)*" both appear to relate to article 16 (traffic regulation measures) of the draft DCO. Article 16 requires the Applicant to provide 4 weeks' notice before it makes provision for traffic regulation which has effect as though it were a duly made traffic order. The Applicant is able to make traffic orders for the purposes of the construction, maintenance and decommissioning of the authorised development. This purpose differs from the purposes for which a traffic authority may make temporary traffic regulation orders (TTRO) under section 14 of the Road Traffic Regulation Act 1984 (the 1984 Act). Any TTRO made by the traffic authority may only be for a maximum 18-month period. Including this power within the DCO ensures that necessary traffic regulation can be put in place for the needed duration without placing any additional burden on Council resources, whilst also avoiding any concern that traffic order made by the traffic authority for the purposes of the authorised development would not comply with the purposes listed in section 14 of the 1984 Act. The Council's usual timeframe for making TTROs is therefore not relevant as it is the Applicant that will be making the traffic regulations.

WC-181	Socio-Economics, Tourism and Recreation	Public Rights of Way	15.1. It is considered that this development, whilst providing additional permissive paths, will place additional pressure on the surrounding Public Rights of Way, which the public will use in greater numbers if they want to enjoy the countryside without walking amongst the panels.	The Applicant has assessed the likely effects on the PROW network as a result of the Scheme in **ES Volume 1 Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** with individual PRoW assessed in **ES Volume 3 Appendix 16-2 Tourism and Recreation Receptor Tables [APP-241]**. This assessment has considered changes to the use of PRoW which are directly affected by the Scheme but has not explicitly considered the effect of displacement onto other parts of the PRoW network, as it is considered this would be a dispersed effect rather than a concentrated effect on specific routes. Mitigation for PRoW is presented in the **Outline Public Rights of Way and Permissive Paths Management Plan (oPRoWPPMP) [APP-282]**.

WC-182	Socio-Economics, Tourism and Recreation	Public Rights of Way	15.2. The council requests that a contribution of £20,000 per annum is provided for the improvement and enhancement of the Public Rights of Way network. This contribution should be index linked and provided each year to the council. Some improvements to the PROW network may involve a compensation payment to landowners, so the money should be able to be rolled over every year to allow improvements which cost more than £20,000 to be undertaken. It is suggested that in years 1-20 of operation, improvements are targeted on footpaths starting within 2km of the red line boundary (excluding the cable connection route) and within 3km of other routes of Public Access starting. In years 20-40, this should be increased to encompass footpaths starting within 3km of the development's red line boundary and other route of public access starting within 4km (excluding the CRC). In years 40-60, this should be increased to encompass footpaths starting within 4km of the sites red line and other routes of public access starting within 5km (excluding the CRC). All contributions to be spent within 5 years of the site being decommissioned, or they are to be returned. If the scheme is at any point granted an extension to its life span, then the arrangement should continue and follow on for the length of the new agreement. If an extension is granted, then the area in which the funding can be spent should be	The Applicant is able to commit to improvements and/or enhancements to PRoW within the Order Limits where these would help to mitigate or offset adverse effects as a result of the Scheme. A financial contribution to PRoW network maintenance and upgrades beyond this would need to be agreed through the Community Benefit Fund which operates and is to be agreed outside of the DCO process. The Applicant is exploring bespoke mechanisms through which requests, such as the provision of funds for specific purposes, could be implemented. They consider the specific request for an annual sum from the local authority to be a suitable use of the Community Benefit Fund. The Applicant is committed to ensuring that the fund would have independent, professional administration and oversight to manage its lifecycle, supported by dedicated local needs analysis to identify project criteria that align with community priorities, such as environmental sustainability, education, or social infrastructure. It is proposed that establishing an independent decision making panel involving local representatives to ensure that funding is allocated fairly and remains community-driven from application to distribution. This approach is reflected in ongoing engagement and representations with local authorities.

			increased by a further 1km for every additional 10 years.	
WC-183	Socio-Economics, Tourism and Recreation	Public Rights of Way	PROW General Principles 15.3. All stiles should be removed from within the red line boundary. Any structures that are required for the control of livestock should be the least restrictive option for all structures and gaps will need to comply with BS 5709:2018. Maintenance will need to be planned to make sure that the structures remain compliant with BS 5709:2018. 15.4. All structures (both existing and new)	The Applicant is able to commit to the removal of stiles within land under freehold acquisition by the Applicant to enhance network connectivity. Features on the boundaries of the Order Limits, or on the boundaries of land under freehold acquisition by the Applicant may require gates compliant with BS 5709:2018, as neighbouring land may be reserved for grazing. Maintenance of PRoW furniture and water crossings within land under freehold acquisition by the Applicant is their responsibility to

			within the red line will need to be authorised by the highway authority. They will need to be either included within the definitive statement for the path, or they will need to have a 147 authorisation under the Highways Act 1980. If the structure is required to safeguard the public, then these will need to be authorised under section 66 of the Highways Act 1980.	maintain, and is secured through the **oPROWPPMP [APP-282]** by Requirement 16 in Schedule 2 to the **Draft DCO [APP-016]**. All additional or altered structures along PROW will be set out at the detailed design stage to be approved by the highway authority, in compliance with the relevant section of the Highways Act 1980.
WC-184	Socio-Economics, Tourism and Recreation	Public Rights of Way	15.5. The Applicant should ensure that all Public Rights of Way are signed, and way marked through the development. 15.6. The Applicant should make sure that all existing ditch crossing are improved so that a minimum usable width of 1.2m is available. Where possible, culverts should be installed to provide the safest and most accessible crossing available for users. These should also limit the failures that can arise with sleeper bridges and the washout that can occur of the Armco bridges. It is considered that this should improve the availability of the network. 15.7. The Applicant should provide a point of contact, with details, to Wiltshire's Countryside Access Team for the site's managers so that issues can be resolved quickly. Any changes to these contact details should be notified to the Countryside Access Team within 14 days. It is considered that it may also be beneficial to hold 2 meetings a year to discuss access matters and monitor	Provision of signage and waymarkers for PRoW can be secured through the **oPROWPPMP [APP-282]** as secured by Requirement 16 in Schedule 2 to the **Draft DCO [APP-016]**. The Applicant can commit to ensure ditch crossings are made safe and any crossings in a poor state of repair can be improved to a like-for-like construction. Where Wiltshire Council's PRoW team have recommended improvements to ditch crossings that would require widening of existing crossings, or providing new culverts, these would not be able to be undertaken as part of the DCO as these works would substantially alter the Applicant's approach to watercourses, the Scheme's drainage strategy and ecological mitigation. However, the Applicant is happy for these improvements to be undertaken by Wiltshire Council's PRoW team and contractors and is able to commit to funding this through the proposed 'ringfenced' financial contribution in the Community Benefit Fund.

			the use of the permissive paths. It may also be beneficial to open these meetings up to representatives from the user groups and Parish Councilors, where there are specific Public Access issues. If it's felt that these are no longer required, then it could be agreed that they are ceased. However, it is felt that they might be useful during construction and the early years of the scheme.	General issues and interactions with the Scheme will be headed by the community liaison group, as secured by Requirement 4 in Schedule 2 to the **Draft DCO [APP-016]**. Key contact details for leading group members, or specifically the Community Liaison Manager during construction, peak replacement works, and decommissioning, can be shared with Wiltshire's Countryside Access Team. These details would also be available to Parish Council's and key local stakeholder groups.

WC-185	Socio-Economics, Tourism and Recreation	Public Rights of Way	PROW Network Improvements 15.8. It is proposed that within two years of consent being granted, Wiltshire Council's Rights of Way team will have surveyed all the Public Rights of Way within 4 kilometers of Lime Down Sites A, B, C, D and E. Following this, a list of improvements will be suggested, and funding applications submitted to the scheme's Community Benefit Fund as further funding will be required to undertake these improvements in addition to the requested index linked £20,000 per annum. The council considers that priority should be given towards funding improvements to the Public Rights of Way network which are in close proximity to the site, as it is the local users of the Public Rights of Way network who will be some of the most adversely affected by the change to the aesthetics of the network. 15.9. However, the council has already identified some improvements within its consultation responses. Those that are within the red line boundary should be considered for inclusion as part of the scheme and delivered as part of the DCO, whilst those outside the red line boundary could be progressed through the Community Benefit Fund or utilising the annual funding, once landowner permission has been obtained.	Any financial contribution to PRoW network upgrades as requested by Wiltshire Council's PRoW Team would be agreed through the Community Benefit Fund, which operates and is to be agreed outside of the DCO process. The Applicant welcomes ongoing discussion and is happy for the approach to PRoW funding to be agreed through the Statement of Common Ground. The Applicant is able to commit to improvements or remedial works to PRoW inside the Order Limits, where those works would help to mitigate or offset adverse effects on PRoW use as a result of the Scheme. This would include repairs to PRoW furniture, signage, clearing of hedgerow gaps, and repairing any surfaces disturbed by construction activities. These measures are secured through the **oPROWPPMP [APP-282]** by Requirement 16 in Schedule 2 to the **Draft DCO [APP-016]**. Improvements to PROW infrastructure within land under freehold acquisition by the Applicant are also committed to and are in the process of being agreed through the Statement of Common Ground with Wiltshire Council.

WC-186	Socio-Economics, Tourism and Recreation	Public Rights of Way	15.10. The identified improvements are outlined below. Within the Order Limits	Refer to the Applicant's response to each point individually below.

WC-187	Socio-Economics, Tourism and Recreation	Public Rights of Way	SHER15 Grid Reference ST 86280 85287: If this land is not subject to livestock anymore, then the stile will need to be removed and replaced with a gap which conforms to BS5709:2018. If livestock are going to be present as part of the grazing regime, then a gate which conforms to the least restrictive option should be installed. This structure will need to be applied for with a section 147 application. A sleeper bridge is present at this location and should be replaced with a culvert to make the public footpath as accessible as possible. A useable surface width of 1.2m should be provided. When exiting the Public Footpath, visibility to the north is a little challenging and would benefit from the hedge being well maintained to provide as much visibility as possible.	The Applicant does not propose livestock in the adjacent field (A11) during the operational lifetime of the Scheme, as set out in **ES Volume 2, Figure 3-4-1 [APP-084]** and controlled through the **oLEMP [APP-283]**, and so can commit to removal of the stile. Repair, replacement or upgrade of the sleeper bridge in this location will be determined at the detailed design stage through agreement of a detailed **oPROWPPMP [APP-282]**. Changes to water crossing will require consultation with the Applicant's ecology and hydrology consultants and be subject to agreement from the relevant statutory bodies. Maintenance of the highway verge for the visibility for PRoW users will be undertaken in co-ordination with the highway authority and secured through the **oPROWPPMP [APP-282]**. Each of these management plans is secured by Requirements in Schedule 2 to the **Draft DCO [APP-016]**.
WC-188	Socio-Economics, Tourism and Recreation	Public Rights of Way	SHER15 Grid Reference ST 86662 85190: A pedestrian gate is already installed at this location. It is recommended that the culvert here is checked and cleared regularly as it is of an old stone construction.	Maintenance of PRoW furniture and water crossings within land under freehold acquisition by the Applicant is their responsibility, and is secured through the **oPROWPPMP [APP-282]** by Requirement 16 in Schedule 2 to the **Draft DCO [APP-016]**.

WC-189	Socio-Economics, Tourism and Recreation	Public Rights of Way	NORT5 Grid Reference ST 87676 84841: This position is very close to the cable route, which should be installed away from the stile to minimise the risk of accidental damage. The stile should be replaced with a more accessible piece of access furniture, if required for the control of livestock.	Micrositing of the Grid Connection Cables is to be undertaken at the detailed design stage, at which point avoidance of the existing stile can be defined. As this feature is not within land under freehold acquisition by the Applicant, the Applicant will discuss options for removal of the stile for more accessible PRoW furniture with the relevant landowner(s).
WC-190	Socio-Economics, Tourism and Recreation	Public Rights of Way	NORT1 Grid Reference ST88846 84982: This path forms part of the White Walls Walking trail, which is a locally promoted route. At certain times of year, it is difficult to see where you should cross between the arable fields, as no livestock is present so no structure is required. A fence post with a waymark on it has been the point that walkers have to aim at currently. This could be enhanced if a post with a yellow top was installed something like the following: Enhance Routes with Yellow Way-marker Postcaps.	The Applicant does not propose livestock in the adjacent fields during the operational lifetime of the Scheme, as set out in **ES Volume 2, Figure 3-4-2 [APP-084]** and controlled through the **oLEMP [APP-283]**, and so can confirm no structure is required. Waymarkers for NORT1/the White Walls Way can be provided at the point the definitive PRoW route crosses the field boundary. This can be secured through the **OPROWPPMP [APP-282]** as secured by Requirement 16 in Schedule 2 to the **Draft DCO [APP-016]**.
WC-191	Socio-Economics, Tourism and Recreation	Public Rights of Way	SHER18 ST 86483 83271: The stile should be replaced with a more accessible piece of access furniture if required for the control of livestock. If not required, then the stile should be removed.	The Applicant does not propose livestock in the unfenced section of the adjacent field (C23) during the operational lifetime of the Scheme, as set out in **ES Volume 2, Figure 3-4-3.3 [APP-084]** and controlled through the **oLEMP [APP-283]**, and so can commit to removal of the stile.
WC-192	Socio-Economics, Tourism and Recreation	Public Rights of Way	SHER18 ST 86341 83412: There is no gap or access furniture provided for SHER18 within the legal line of the footpath. A gap should be created or if no livestock is present then the most accessible structure should be installed.	Waymarkers for SHER18 can be provided at the point the definitive PROW route crosses the field boundary. This can be secured through the **OPROWPPMP [APP-282]** as secured by Requirement 16 in Schedule 2 to the **Draft DCO [APP-016]**. As this feature is on the boundary

				of the Order Limits, the Applicant will discuss options for the most suitable PRoW furniture with the relevant landowner(s).
WC-193	Socio-Economics, Tourism and Recreation	Public Rights of Way	SHER18 ST 86209 83582: There is no gap or access furniture provided for SHER18 within the legal line of the footpath. A gap should be created or if no livestock is present then the most accessible structure should be installed.	Waymarkers for SHER18 can be provided at the point the definitive PROW route crosses the field boundary. This can be secured through the **OPROWPPMP [APP-282]** as secured by Requirement 16 in Schedule 2 to the **Draft DCO [APP-016]**. As this feature is on the boundary of the Order Limits, the Applicant will discuss options for the most suitable PROW furniture with the relevant landowner(s).
WC-194	Socio-Economics, Tourism and Recreation	Public Rights of Way	LUCK57 SHER35: There is a requirement to fill in potholes / improve the surface condition. The first 30m of the Byway should be consolidated to reduce mud and loose stones being brought onto the road.	Maintenance of PRoW surface within land under freehold acquisition by the Applicant is their responsibility to maintain, and is secured through the **oPROWPPMP [APP-282]** by Requirement 16 in Schedule 2 to the **Draft DCO [APP-016]**.
WC-195	Socio-Economics, Tourism and Recreation	Public Rights of Way	HULL26 Grid Reference ST86932 83926: There is a broken stile. This should be removed if not required for livestock control. However, if a piece of access furniture is required, then it should be the least restrictive option. Additionally, the sleeper bridge currently in place will need to be replaced or widened to provide a minimum useable width of 1.2m.	The Applicant does not propose livestock in the adjacent field (C24) during the operational lifetime of the Scheme, as set out in **ES Volume 2, Figure 3-4-3.2 [APP-084]** and controlled through the **oLEMP [APP-283]**, and so can commit to removal of the stile. Repair, replacement or upgrade of the sleeper bridge in this location will be determined at the detailed design stage through agreement of a detailed PROWPPMP. Changes to water crossing will require consultation with the Applicant's ecology and hydrology consultants, and be subject to

				agreement from the relevant statutory bodies. Each of these management plans is secured by Requirements in Schedule 2 to the **Draft DCO [APP-016]**.
WC-196	Socio-Economics, Tourism and Recreation	Public Rights of Way	HULL23 Grid Reference ST87411 82934: A gap conforming to the British Standard should be created at this location and a new footpath sign installed.	Provision of a new hedgerow gap for HULL23 is proposed at this location as set out in **ES Volume 2, Figure 3-4-3.2 [APP-084]** and controlled through the **oLEMP [APP-283]**. A new way marker can also be provided at this point. This would be secured through the detailed design stage by Requirements 5 and 7 in Schedule 2 to the **Draft DCO [APP-016]**.
WC-197	Socio-Economics, Tourism and Recreation	Public Rights of Way	The gap at ST87445 82867 is not recorded as the line of the footpath, any Public Footpath signage at this location should be removed.	The existing gap and waymarker at ST 87445 82867 are not within the Order Limits and therefore are the responsibility of Wiltshire Council and the relevant landowner(s) to reconcile. That notwithstanding, the Applicant agrees that this would be best undertaken in tandem with the provision of a new gap and waymarker at ST 87411 82934, to which the Applicant is able to commit.
WC-198	Socio-Economics, Tourism and Recreation	Public Rights of Way	HULL24 at Grid Reference ST 87946 83044: Two stiles are located at this position. If they are not required for the control of livestock, then they should be replaced with a gap to the British Standard. If they are required for the control of livestock, then they should be replaced with the least restrictive piece of access furniture.	As this feature is not within land under freehold acquisition by the Applicant, the Applicant will discuss options for removal of the stiles for more accessible PRoW furniture with the relevant landowner(s).

WC-199	Socio-Economics, Tourism and Recreation	Public Rights of Way	HULL24: A gap should be created near to the pond at Grid Reference ST 88210 82940. The old field gate at ST88191 82912 is not on the definitive line of the footpath.	As this feature is not within land under freehold acquisition by the Applicant, the Applicant will discuss options for removal of the stiles for more accessible PRoW furniture with the relevant landowner(s).
WC-200	Socio-Economics, Tourism and Recreation	Public Rights of Way	HULL23 Grid Reference ST 87924 82694: This stile will need to be removed. If a piece of countryside access furniture is required for the control of livestock, then it should be the least restrictive option.	As this feature is on the boundary of land under freehold acquisition by the Applicant, the Applicant will discuss options for the most suitable PRoW furniture with the relevant landowner(s) as the landowner(s) may reserve the right to have livestock on the field to the east of this feature. This can be secured through the **oPROWPPMP [APP-282]** as secured by Requirement 16 in Schedule 2 to the **Draft DCO [APP-016]**.
WC-201	Socio-Economics, Tourism and Recreation	Public Rights of Way	NORT10 Grid Reference ST 88811 83921: There is a double stile and sleeper bridge. The Hedge and Ditch Rule may mean that the responsibility for this ditch and sleeper bridge rests with the developer. The Stile on the boundary should be removed and replaced with the most accessible gate option if one is required for the control of livestock. If no livestock are present, then a gap should be provided. The sleeper bridge should be replaced with a culvert, which will provide a more accessible crossing point.	Repair, replacement or upgrade of the sleeper bridge in this location will be determined at the detailed design stage through agreement of a detailed **oPROWPPMP [APP-282]**. Changes to water crossing will require consultation with the Applicant's ecology and hydrology consultants, and be subject to agreement from the relevant statutory bodies. As this feature is on the boundary of land under freehold acquisition by the Applicant, the Applicant will discuss options for the most suitable PROW furniture with the Countryside Access Team and relevant landowner(s), as the landowner(s) may reserve the right to have livestock on the field to the north of this feature. This can be secured through the **oPROWPPMP [APP-282]** as secured by Requirement 16 in

				Schedule 2 to the **Draft DCO [APP-016]**.
WC-202	Socio-Economics, Tourism and Recreation	Public Rights of Way	NORT10 / HULL1 Grid Reference ST 89089 83585: The ground on the north side of the bridge is a little uneven and is sloped towards the ditch. This should be levelled and some stone laid down to improve this small area. The stile should be removed here and replaced with the most accessible gate if one is required for the control of livestock. If not, then a gap should be provided. The current sleeper bridge is too narrow. On the council officer's site visit, material from the watercourse had backed up on it, so it is considered that it will need to be raised up a bit and widened. This might be unsuitable for a culvert due to the amount of water which was passing through.	Maintenance of public right of way surface, furniture and water crossings within land under freehold acquisition by the Applicant is their responsibility to maintain, and is secured through the **oPROWPPMP [APP-282]** by Requirement 16 in Schedule 2 to the **Draft DCO [APP-016]**. Repair, replacement or upgrade of the sleeper bridge in this location will be determined at the detailed design stage through agreement of a detailed **oPROWPPMP [APP-282]**. Changes to water crossing will require consultation with the Applicant's ecology and hydrology consultants, and be subject to agreement from the relevant statutory bodies.
WC-203	Socio-Economics, Tourism and Recreation	Public Rights of Way	HULL1 Grid Reference ST89212 83450: The line of the footpath at this location needs to be checked to determine where it runs. HULL1 Grid Reference ST 89231 83423: Improved way marking at this point would be beneficial.	The Applicant understands that in this location, the definitive route of the PRoW (as shown on **ES Volume 2, Figure 3-4-4.1 [APP-084]** crosses two hedge and ditch boundaries, while the walked and historically mapped route (archived OS maps available at National Library of Scotland online records) lies to the east of these boundary features. The Applicant therefore considers this discrepancy has arisen as a result of mapping or surveying errors. The Applicant therefore seeks to agree the specific

				approach required at this location to ensure the legal and practical requirements for this PRoW can be reconciled. Should new hedgerow gaps, waymarking, and ditch crossings be required to maintain the legally defined route, these fall within land under freehold acquisition by the Applicant, and as such it is their responsibility to maintain, and is secured through the **oPROWPPMP [APP-282]** by Requirement 16 in Schedule 2 to the **Draft DCO [APP-016]**. Creation of new ditch crossings in this location will be determined at the detailed design stage through agreement of a detailed **oPROWPPMP [APP-282]**. Changes to water crossing will require consultation with the Applicant's ecology and hydrology consultants, and be subject to agreement from the relevant statutory bodies.
WC-204	Socio-Economics, Tourism and Recreation	Public Rights of Way	HULL1 Grid Reference ST 89371 83149: This sleeper bridge would benefit from being replaced with a culvert, which would provide a better crossing point of the ditch. If this cannot be achieved, then the existing sleep bridge should be widened, levelled and a handrail provided.	Repair, replacement or upgrade of the sleeper bridge in this location will be determined at the detailed design stage through agreement of a detailed **oPROWPPMP [APP-282]**. Changes to water crossing will require consultation with the Applicant's ecology and hydrology consultants, and be subject to agreement from the relevant statutory bodies. As this feature is on the boundary of the Order Limits and land under freehold acquisition by the Applicant, the Applicant will discuss options for the most suitable PRoW furniture with the

				Countryside Access Team and relevant landowner(s), as the landowner(s) may be responsible for maintaining this feature (if applying the hedge and ditch rule). This can be secured through the **oPROWPPMP [APP-282]** as secured by Requirement 16 in Schedule 2 to the **Draft DCO [APP-016]**.
WC-205	Socio-Economics, Tourism and Recreation	Public Rights of Way	HULL2 Grid Reference ST89419 83763: The sleeper bridge should be replaced with a culvert. The stile should be removed if it is no longer required for the control of livestock and a gap installed which complies with the British Standard. If a structure is required for the control of livestock, then the least restrictive option should be used.	The Applicant does not propose livestock in the adjacent field (D6) during the operational lifetime of the Scheme, as set out in **ES Volume 2, Figure 3-4-4.1 [APP-084]** and controlled through the **OLEMP [APP-283]**, and so can commit to removal of the stile. Repair, replacement or upgrade of the sleeper bridge in this location will be determined at the detailed design stage through agreement of a detailed **oPROWPPMP [APP-282]**. Changes to water crossing will require consultation with the Applicant's ecology and hydrology consultants, and be subject to agreement from the relevant statutory bodies.
WC-206	Socio-Economics, Tourism and Recreation	Public Rights of Way	HULL2 Grid Reference ST 89863 84108: The stile should be removed unless it is required for the control of livestock. If a structure is required for livestock control, then it should be least restrictive option.	As this feature is on the boundary of the Order Limits and land under freehold acquisition by the Applicant, the Applicant will discuss options for the most suitable PROW furniture with the relevant landowner(s). This can be secured through the **oPROWPPMP [APP-282]** as secured by Requirement 16 in Schedule 2 to the **Draft DCO [APP-016]**.
WC-207	Socio-Economics, Tourism	Public Rights of Way	HULL4 Grid Reference ST 90108 84051: Waymarking for this path as it	Waymarkers for HULL4 can be provided at the point the definitive PRoW route crosses the field boundary

	and Recreation		enters and exits the site should be installed.	or Order Limits. This can be secured through the **OPROWPPMP [APP-282]** as secured by Requirement 16 in Schedule 2 to the **Draft DCO [APP-016]**.
WC-208	Socio-Economics, Tourism and Recreation	Public Rights of Way	HULL4 Grid Reference ST 90078 83902: The bridge over the stream could do with replacing with one which is higher and longer.	Maintenance of PRoW surface, furniture and water crossings within land under freehold acquisition by the Applicant is their responsibility to maintain, and is secured through the **oPROWPPMP [APP-282]** by Requirement 16 in Schedule 2 to the **Draft DCO [APP-016]**. Repair, replacement or upgrade of the bridge in this location will be determined at the detailed design stage through agreement of a detailed **oPROWPPMP [APP-282]**. Changes to water crossing will require consultation with the Applicant's ecology and hydrology consultants, and be subject to agreement from the relevant statutory bodies.
WC-209	Socio-Economics, Tourism and Recreation	Public Rights of Way	HULL5 Grid Reference ST 90448 83860: A gap should be created in the hedge and waymarked (the current gap and bridge provide access into a different field at Grid Reference ST90460 83860).	Provision of a new hedgerow gap for HULL5 can be proposed at this location as set out in **ES Volume 2, Figure 3-4-4.1 [APP-084]** and controlled through the **OLEMP [APP-283]**. A new waymarker can also be provided at this point. This can be secured through the detailed design stage by Requirements 5 and 7 in Schedule 2 to the **Draft DCO [APP-016]**. As this feature is on the boundary of the Order Limits and land under freehold acquisition by the Applicant, the Applicant will discuss options for the most suitable PROW furniture with the

				Countryside Access Team and relevant landowner(s), as the landowner(s) may reserve the right to have livestock on the field to the northeast of this feature. This can be secured through the **oPROWPPMP [APP-282]** as secured by Requirement 16 in Schedule 2 to the **Draft DCO [APP-016]**.
WC-210	Socio-Economics, Tourism and Recreation	Public Rights of Way	HULL5 Grid Reference ST 90413 83849: A new bridge will need to be installed to get this Public Footpath back on its correct legal line.	Maintenance of PRoW surface, furniture and water crossings within land under freehold acquisition by the Applicant is their responsibility to maintain, and is secured through the **oPROWPPMP [APP-282]** by Requirement 16 in Schedule 2 to the **Draft DCO [APP-016]**. Repair, replacement or upgrade of the bridge in this location will be determined at the detailed design stage through agreement of a detailed **oPROWPPMP [APP-282]**. Changes to water crossing will require consultation with the Applicant's ecology and hydrology consultants, and be subject to agreement from the relevant statutory bodies.
WC-211	Socio-Economics, Tourism and Recreation	Public Rights of Way	HULL5 Grid Reference ST 90430 83812: This stile should be removed and replaced with a gap. However, it a piece of access furniture is required then it should be the least restrictive option.	The Applicant does not propose livestock in the adjacent fields (D9/D11) during the operational lifetime of the Scheme, as set out in **ES Volume 2, Figure 3-4-4.1: Landscape and Ecology Mitigation Plan [APP-084]** and controlled through the **OLEMP [APP-283]**, and so can commit to removal of the stile.

WC-212	Socio-Economics, Tourism and Recreation	Public Rights of Way	HULL6 Grid Reference ST 90888 83334: At the junction of HULL6 and an unclassified road, the gateway access needs to be improved as it contained a large puddle. A way mark post should also be installed.	A new waymarker for HULL6 can be provided at this point. This can be secured through the detailed design stage by Requirements 5 in Schedule 2 to the **Draft DCO [APP-016]**. Maintenance of PRoW surface, furniture and waymarking within land under freehold acquisition by the Applicant is their responsibility to maintain, and is secured through the **oPROWPPMP [APP-282]** by Requirement 16 in Schedule 2 to the **Draft DCO [APP-016]**.
WC-213	Socio-Economics, Tourism and Recreation	Public Rights of Way	HULL6 junction with HULL6 spur path Grid Reference ST 90793 83505: A way mark post should be installed to aid navigation.	A new waymarker for HULL6 and its spur can be provided at this point. This can be secured through the detailed design stage by Requirements 5 in Schedule 2 to the **Draft DCO [APP-016]**. Maintenance of PRoW waymarking within land under freehold acquisition by the Applicant is their responsibility to maintain, and is secured through the **oPROWPPMP [APP-282]** by Requirement 16 in Schedule 2 to the **Draft DCO [APP-016]**.

WC-214	Socio-Economics, Tourism and Recreation	Public Rights of Way	HULL6 Grid Reference ST 90985 83867: The footpath approach should be improved with additional steps or ramp. The rail that acts as a barrier to access on the north side of the bridge should also be removed.	Maintenance of PRoW surface, furniture and waymarking within land under freehold acquisition by the Applicant is their responsibility to maintain, and is secured through the **oPROWPPMP [APP-282]** by Requirement 16 in Schedule 2 to the **Draft DCO [APP-016]**. Repair, replacement or upgrade of the bridge and supporting furniture in this location will be determined at the detailed design stage through agreement of a detailed **oPROWPPMP [APP-282]**.
WC-215	Socio-Economics, Tourism and Recreation	Public Rights of Way	HULL6 Grid Reference ST 91072 83913: The way marking through young woodland should be improved, and path clearance to site maintenance for twice yearly cut during growing season (ensure checking for nesting birds and cutting at a height of 6 inches to protect vulnerable species).	Maintenance of the PRoW surface, furniture and waymarking within land under freehold acquisition by the Applicant is their responsibility to maintain, and is secured through the **oPROWPPMP [APP-282]** by Requirement 16 in Schedule 2 to the **Draft DCO [APP-016]**. Vegetation clearance to maintain PRoW access shall be undertaken in accordance with the measures set out in the **OLEMP [APP-283]** and **OEPMS [APP-284]**, as secured by Requirements 7 and 8 in Schedule 2 to the **Draft DCO [APP-016]**.
WC-216	Socio-Economics, Tourism and Recreation	Public Rights of Way	HULL6 Grid Reference ST 91148 83935: The rail on the north side of the footbridge should be removed.	As this feature is on the boundary of the Order Limits and land under freehold acquisition by the Applicant, the Applicant will discuss options for the most suitable PRoW furniture with the relevant landowner(s), as the landowner(s) may be responsible for maintaining this feature (if applying the

				hedge and ditch rule). This can be secured through the **oPROWPPMP [APP-282]** as secured by Requirement 16 in Schedule 2 to the **Draft DCO [APP-016]**.
WC-217	Socio-Economics, Tourism and Recreation	Public Rights of Way	Grid Reference ST 90953 83892: A small culvert over ditch should be installed for a path to link HULL6 to MALW50.	The Applicant has committed to providing a permissive path from footpath HULL6 to footpaths HULL2, 4, and 5, as set out in **ES Volume 2, Figure 3-4-4.2 [APP-084]** and controlled through the **OLEMP [APP-283]**. As such, a culvert or watercourse crossing will be required at ST 90953 83892. The construction of the proposed crossing point in this location will be determined at the detailed design stage through agreement of a detailed **oPROWPPMP [APP-282]**. Creation of a new water crossing will require consultation with the Applicant's ecology and hydrology consultants, and be subject to agreement from the relevant statutory bodies. The Applicant seeks to clarify that this is not proposed to connect to MALW50, which terminates at a ditch on the boundary of the Order Limits at grid reference ST 90816 83893. Connection to MALW50 has not been considered feasible as it would require third party landowner negotiation, a brand new water crossing and the disturbance of a small pond within the Order Limits.

WC-218	Socio-Economics, Tourism and Recreation	Public Rights of Way	HULL7/MALW51 Grid Reference ST 91401 83616: There is an existing bridle gate. If this is no longer required for the control of livestock, then the bridle gate should be removed. The area around the gate will need to be improved to make sure that the gate complies to British Standards (the current gate may be non-compliant because of the handle and manoeuvring spaces and the overgrown hedges). The ground also needs to be improved so as not to hold water in winter. If the gate is required, then confirmation is required that a 147 authorisation is in place for it.	As this feature is not within land under freehold acquisition by the Applicant, the Applicant will discuss options for improvement and maintenance of PROW furniture and surface with the relevant landowner(s).
WC-219	Socio-Economics, Tourism and Recreation	Public Rights of Way	MALW52/HULL8 Grid Reference ST 91632 83584: This could be improved with a way mark post with a yellow top. Caution a culvert entrance is quite close to this gap, the Applicant should confirm whether they are happy with this open ditch or if it needs to be fenced off.	Waymarkers for HULL8 can be provided at the point the definitive PROW route crosses the field boundary. As this feature is not within land under freehold acquisition by the Applicant, the Applicant will discuss options for improvement and maintenance of PROW furniture, waymarking, and safety features (if required) with the relevant landowner(s).
WC-220	Socio-Economics, Tourism and Recreation	Public Rights of Way	HULL8 Grid Reference ST 91353 83438: Waymark post required.	Waymarkers for HULL8 can be provided at the point the definitive PROW route crosses the field boundary. As this feature is not within land under freehold acquisition by the Applicant, the Applicant will discuss options for positioning of PROW waymarking with the relevant landowner(s).

WC-221	Socio-Economics, Tourism and Recreation	Public Rights of Way	HULL8 Grid Reference ST 91105 83275: Waymark post required.	Waymarkers for HULL8 and its stub can be provided at the point the definitive PROW routes meet. As this feature is not within land under freehold acquisition by the Applicant, the Applicant will discuss options for positioning of PROW waymarking with the relevant landowner(s).
WC-222	Socio-Economics, Tourism and Recreation	Public Rights of Way	HULL8 Grid Reference ST 91049 83218: There is no sign of path through hedge on definitive line. A gap should be installed in the hedge and culvert for ditch crossing point. A Waymark post is required.	As this feature is not within land under freehold acquisition by the Applicant, the Applicant will discuss options for improvement and maintenance of PROW furniture and water crossings with the relevant landowner(s).
WC-223	Socio-Economics, Tourism and Recreation	Public Rights of Way	HULL7 Grid Reference ST 90946 83373: Install waymarking at this location.	Waymarkers for HULL7 can be provided at the point the definitive PROW route crosses the field boundary. This can be secured through the **oPROWPPMP [APP-282]** as secured by Requirement 16 in Schedule 2 to the **Draft DCO [APP-016]**. As this feature is on the boundary of land under freehold acquisition by the Applicant, the Applicant will discuss options for positioning of PROW waymarking with the relevant landowner(s)
WC-224	Socio-Economics, Tourism and Recreation	Public Rights of Way	Unclassified Road Grid Reference ST 90617 83129: Improve the surface along whole length of UCR.	This unclassified road (noted as being designated Down Road, Hullavington) is proposed for construction and operational access to part of the Scheme. The road is therefore subject to mitigation measures as set out in the **OCTMP [APP-287]** including pre-construction condition survey to determine the suitability of the surface for access. Should the surface be deemed unsuitable, the Applicant will seek to repair or upgrade the surface of

				this unclassified route for construction. This would have to be agreed in detail by the highway authority, as secured by way of Requirement 15 in Schedule 2 to the **Draft DCO [APP-016]**.
WC-225	Socio-Economics, Tourism and Recreation	Public Rights of Way	Unclassified Road Grid Reference ST 90461 83005: Ford may need work to make sure that the banks are stabilised to take any increase in use without the wash from vehicles undermining the banks. A new bridge should be installed to replace the Armco bridge which has been washed out. The council officer visited after a day of rainfall and the bridge was impacting on the flow. The new pedestrian bridge should therefore be raised a little to limit the restriction on the flow of water.	As this feature is not within land under freehold acquisition by the Applicant, the Applicant understands that the responsibility for maintenance of this ford and footbridge rests with the highway authority. The Applicant is not applying to use this ford for construction vehicle access, and so it is not subject to the measures set out in the **OCTMP [APP-287]** or **oPROWPPMP [APP-282]**. That notwithstanding, the Applicant is happy to explore financial contributions to this feature through the Community Benefit Fund, albeit highlighting that this is separate to the DCO process.
WC-226	Socio-Economics, Tourism and Recreation	Public Rights of Way	HULL6 Grid Reference ST 90355 83360: There is a sleeper bridge and stile. Replace sleeper bridge with a culvert as the current sleeper bridge is too narrow and slippery. Replace stile with a gap if not required for livestock control. If a structure is required, then replace stile with a more accessible piece of access furniture.	As this feature is on the boundary of the Order Limits and land under freehold acquisition by the Applicant, the Applicant will discuss options for the most suitable PROW furniture with the relevant landowner(s), as the landowner(s) may reserve the right to have livestock on the field to the west of this feature. This can be secured through the **oPROWPPMP [APP-282]** as secured by Requirement 16 in Schedule 2 to the **Draft DCO [APP-016]**.

WC-227	Socio-Economics, Tourism and Recreation	Public Rights of Way	HULL6 Grid Reference ST 90528 83390: Replace Armco bridge with a culvert and install way mark posts as well.	Repair, replacement or upgrade of the bridge in this location will be determined at the detailed design stage through agreement of a detailed **oPROWPPMP [APP-282]**. Changes to water crossing will require consultation with the Applicant's ecology and hydrology consultants, and be subject to agreement from the relevant statutory bodies.
WC-228	Socio-Economics, Tourism and Recreation	Public Rights of Way	MALW54 Grid Reference ST 91883 83197: Bridleway sign post required.	Bridleway MALW54 is subject to diversion measures during construction to facilitate access to Lime Down E for HGVs. As part of this, the diversion route will be fully waymarked and segregated from HGV traffic. Once construction at Lime Down E has completed, bridleway MALW54 will be restored to its original route and all waymarking will be restored. These measures are secured through the **OCTMP [APP-287]** and **oPROWPPMP [APP-282]**, secured respectively by Requirements 15 and 16 in Schedule 2 to the **Draft DCO [APP-016]**.
WC-229	Socio-Economics, Tourism and Recreation	Public Rights of Way	Unclassified Road Grid Reference ST 93080 83162: Improve the surface of the UCR.	This unclassified road (noted as being designated Track parallel to railway, Rodbourne) is proposed for construction and operational access to part of the Scheme. The road is therefore subject to mitigation measures as set out in the **OCTMP [APP-287]** including pre-construction condition survey to determine the suitability of the surface for access. Should the surface be deemed unsuitable, the Applicant will seek to repair or upgrade the surface of this unclassified route for construction. This would have to be agreed in detail by the

				highway authority, as secured by way of Requirement 15 in Schedule 2 to the **Draft DCO [APP-016]**.
WC-230	Socio-Economics, Tourism and Recreation	Public Rights of Way	Unclassified Road Grid Reference ST 92971 83059: New signs required (wording to be agreed with the Countryside Access Officers / Countryside Access Development Officer).	Provision of new signage or waymarkers can also be provided at this location. As this feature is not on land under freehold acquisition by the Applicant, the Applicant will discuss options for the most suitable signage and signage location with the Countryside Access Team and highways authority. This can be secured through the **oPROWPPMP [APP-282]** as secured by Requirement 16 in Schedule 2 to the **Draft DCO [APP-016]**.
WC-231	Socio-Economics, Tourism and Recreation	Public Rights of Way	MALW54/MALW60 Grid Reference ST 92561 82746: A new waymark post is required here. Any new structure would need to be for the control of livestock and be authorised by the CAOs.	Bridleway MALW54 is subject to diversion measures during construction to facilitate access to Lime Down E for HGVs. As part of this, the diversion route will be fully waymarked and segregated from HGV traffic. Once construction at Lime Down E has completed, bridleway MALW54 will be restored to its original route and all waymarking (including for MALW60 at this point) will be restored. These measures are secure through the **OCTMP [APP-287]** and **oPROWPPMP [APP-282]**, secured respectively by Requirements 15 and 16 in Schedule 2 to the **Draft DCO [APP-016]**.

WC-232	Socio-Economics, Tourism and Recreation	Public Rights of Way	MALW54 Grid Reference ST 92381 82834: An old gate in poor condition is left in the open position. Install a new culvert as no crossing point is provided for the old ditch which has also silted up. Install Way marking at this location.	Bridleway MALW54 is subject to diversion measures during construction to facilitate access to Lime Down E for HGVs. As part of this, the diversion route will be fully waymarked and segregated from HGV traffic. Following construction, bridleway MALW54 will be restored to its original route and all waymarking will be restored. At this location, a widened hedgerow gap and culvert is proposed to provide operational vehicle access (light vehicles only) to Lime Down E. These measures are secured through the **OLEMP [APP-283]**, **OCTMP [APP-287]** and **oPROWPPMP [APP-282]**, secured respectively by Requirements 7, 15, and 16 in Schedule 2 to the **Draft DCO [APP-016]**.
WC-233	Socio-Economics, Tourism and Recreation	Public Rights of Way	MALW54 Grid Reference ST 92208 82800: Install way marking at this open gateway.	Provision of a new waymarker can also be provided at this location. As this feature is not on land under freehold acquisition by the Applicant, the Applicant will discuss options for the most suitable location with the Countryside Access Team and landowner(s). This can be secured through the **oPROWPPMP [APP-282]** as secured by Requirement 16 in Schedule 2 to the **Draft DCO [APP-016]**.

WC-234	Socio-Economics, Tourism and Recreation	Public Rights of Way	MALW55 Grid Reference ST 92127 82882: Replace sleeper bridge with a culvert, replace stile with a more accessible piece of furniture if one is required for livestock control. If not, then install a gap with waymarking (this site is part of the cable route).	Bridleway MALW54 and footpath MALW55 are subject to diversion measures during construction to facilitate access to Lime Down E for HGVs. As part of this, the diversion route will be fully waymarked and segregated from HGV traffic. Once construction at Lime Down E has completed, bridleway MALW54 and footpath MALW55 will be restored to their original routes and all waymarking will be restored. These measures are secure through the **OCTMP [APP-287]** and **oPROWPPMP [APP-282]**, secured respectively by Requirements 15 and 16 in Schedule 2 to the **Draft DCO [APP-016]**. Repair, replacement or upgrade of the sleeper bridge in this location will be determined at the detailed design stage through agreement of a detailed **oPROWPPMP [APP-282]**. Changes to water crossing will require consultation with the Applicant's ecology and hydrology consultants, and be subject to agreement from the relevant statutory bodies. As this feature is not on land under freehold acquisition by the Applicant, the Applicant will discuss options for the most suitable PROW furniture with the Countryside Access Team and relevant landowner(s), as the landowner(s) may reserve the right to have livestock on the fields either side of this feature. This can be secured through the **oPROWPPMP [APP-282]** as secured

				by Requirement 16 in Schedule 2 to the **Draft DCO [APP-016]**.
WC-235	Socio-Economics, Tourism and Recreation	Public Rights of Way	MALW53 Grid Reference ST 92016 83002: Replace stile with more accessible furniture if one is required for livestock control. If not, then install a gap with waymarking (this site is part of the cable route). Install way marking for MALW53 and MALW54.	Bridleway MALW54 and footpath MALW53 are subject to diversion measures during construction to facilitate access to Lime Down E for HGVs. As part of this, the diversion route will be fully waymarked and segregated from HGV traffic. Once construction at Lime Down E has completed, bridleway MALW54 and footpath MALW53 will be restored to their original routes and all waymarking will be restored. These measures are secure through the **OCTMP [APP-287]** and **oPROWPPMP [APP-282]**, secured respectively by Requirements 15 and 16 in Schedule 2 to the **Draft DCO [APP-016]**. As this feature is not on land under freehold acquisition by the Applicant, the Applicant will discuss options for the most suitable PROW furniture with the relevant landowner(s), as the landowner(s) may reserve the right to have livestock on the fields either side of this feature. This can be secured through the **oPROWPPMP [APP-282]** as secured by Requirement 16 in

				Schedule 2 to the **Draft DCO [APP-016]**.
WC-236	Socio-Economics, Tourism and Recreation	Public Rights of Way	MALW59 Grid Reference ST 92847 82503: Install a new signpost for the Bridleway.	A new waymarker can also be provided at this location. As this feature is not on land under freehold acquisition by the Applicant, the Applicant will discuss options for the most suitable location with the Countryside Access Team and highways authority. This can be secured through the **oPROWPPMP [APP-282]** as secured by Requirement 16 in Schedule 2 to the **Draft DCO [APP-016]**.
WC-237	Socio-Economics, Tourism and Recreation	Public Rights of Way	MALW59 Grid Reference ST 92669 82359: Improve the way marking.	A new waymarker can also be provided at this location. As this feature is not on land under freehold acquisition by the Applicant, the Applicant will discuss options for the most suitable location with the Countryside Access Team and landowner(s). This can be secured through the **oPROWPPMP [APP-282]** as secured by Requirement 16 in Schedule 2 to the **Draft DCO [APP-016]**.
WC-238	Socio-Economics, Tourism and Recreation	Public Rights of Way	MALW59 Grid Reference ST 92186 81898: Improve the way marking and the gate way needs improving as it is waterlogged.	A new waymarker for MALW59 can be provided at the point the definitive PROW route crosses the field boundary. As this feature is on the boundary of the Order Limits and land under freehold acquisition by the Applicant, the Applicant will discuss options for the most suitable PROW furniture with the relevant landowner(s), as the landowner(s) may reserve the

				right to have livestock on the field to the east of this feature. This can be secured through the **oPROWPPMP [APP-282]** as secured by Requirement 16 in Schedule 2 to the **Draft DCO [APP-016]**. Maintenance of public right of way surface, furniture and water crossings within land under freehold acquisition by the Applicant is their responsibility to maintain, and is secured through the **oPROWPPMP [APP-282]** by Requirement 16 in Schedule 2 to the **Draft DCO [APP-016]**.
WC-239	Socio-Economics, Tourism and Recreation	Public Rights of Way	MALW59 Grid Reference ST 92038 81790: No provision for Public Right of way. Install a new bridle gate if required for the control of livestock and install waymarks.	Provision of a new hedgerow gap for MALW59 is proposed at this location as set out in **ES Volume 2, Figure 3-4-5.2 [APP-084]** and controlled through the **OLEMP [APP-283]**. A new waymarker can also be provided at this point. This can be secured through the detailed design stage by Requirements 5 and 7 in Schedule 2 to the **Draft DCO [APP-016]**. As this feature is on the boundary of the Order Limits and land under freehold acquisition by the Applicant, the Applicant will discuss options for the most suitable PROW furniture with the Countryside Access Team and relevant landowner(s), as the landowner(s) may reserve the right to have livestock on the field to the west of this feature. This can be secured through the **oPROWPPMP [APP-282]** as secured by Requirement 16 in Schedule 2 to the **Draft DCO [APP-016]**.

WC-240	Socio-Economics, Tourism and Recreation	Public Rights of Way	MALW65 Grid Reference ST 92860 82462: Access is provided by a stile, although on the day of inspection, the field gate was open. If a structure is required, then it should be the least restrictive option.	As this feature is not on land under freehold acquisition by the Applicant, the Applicant will discuss options for the most suitable PROW furniture with the relevant landowner(s), as the landowner(s) may reserve the right to have livestock on the field to the east of this feature. This can be secured through the **oPROWPPMP [APP-282]** as secured by Requirement 16 in Schedule 2 to the **Draft DCO [APP-016]**.
WC-241	Socio-Economics, Tourism and Recreation	Public Rights of Way	MALW63 Grid Reference ST 92771 81685: Remove the old broken stile and replace with a gap to BS Standards or the least restrictive access structure if livestock is to be grazed. Install new signage for the footpath.	The Applicant does not propose livestock in any unfenced part of the adjacent field (E25) during the operational lifetime of the Scheme, as set out in **ES Volume 2, Figure 3-4-5.2 [APP-084]** and controlled through the **OLEMP [APP-283]**, and so can commit to removal of the stile in favour of more accessible infrastructure. Provision of a new waymarker for MALW62 can be provided at the point the definitive PROW route crosses the field boundary. The Applicant furthermore proposes an ungated operational access track and permissive path to be accessed within 10 m of this location. As this feature is on the boundary of land under freehold acquisition by the Applicant, the Applicant will discuss options for the most suitable PROW furniture with the Countryside Access Team and relevant landowner(s). This can be secured through the **oPROWPPMP [APP-282]** as secured by Requirement 16 in Schedule 2 to the **Draft DCO [APP-016]**.

WC-242	Socio-Economics, Tourism and Recreation	Public Rights of Way	MALW62 Grid Reference ST 92635 81587: Replace sleeper bridge with a culvert.	Maintenance of public right of way surface, furniture and water crossings within land under freehold acquisition by the Applicant is their responsibility to maintain, and is secured through the **oPROWPPMP [APP-282]** by Requirement 16 in Schedule 2 to the **Draft DCO [APP-016]**. Repair, replacement or upgrade of the sleeper bridge in this location will be determined at the detailed design stage through agreement of a detailed **oPROWPPMP [APP-282]**. Changes to water crossing will require consultation with the Applicant's ecology and hydrology consultants, and be subject to agreement from the relevant statutory bodies.
WC-243	Socio-Economics, Tourism and Recreation	Public Rights of Way	MALW62 Grid Reference ST 92437 81387: Replace stile with a more accessible piece of access furniture if one is required for the control of livestock. Improve way marking.	As this feature is on the boundary of the Order Limits and land under freehold acquisition by the Applicant, the Applicant will discuss options for the most suitable PROW furniture with the relevant landowner(s), as the landowner(s) may reserve the right to have livestock on the field to the southwest of this feature. This can be secured through the **oPROWPPMP [APP-282]** as secured by Requirement 16 in Schedule 2 to the **Draft DCO [APP-016]**.

WC-244	Socio-Economics, Tourism and Recreation	Public Rights of Way	GRIT20 Grid Reference ST 86433 80291: This stile should be replaced with the least restrictive option, once the cable route has been completed. If a structure is required for the control of livestock, this will need to be authorised. The stile will need to be removed during construction as no livestock will be present. This will allow GRIT20 to be more accessible to all users.	Footpath GRIT20 are subject to diversion measures during construction to facilitate construction works for the Cable Route Corridor. As part of this, the diversion route will be fully waymarked and segregated from HGV traffic and the proposed construction compound. Once construction of this section of the Cable Route Corridor is completed, footpath GRIT 20 will be restored to its original route and all waymarking will be restored. These measures are secure through the **OCTMP [APP-287]** and **oPROWPPMP [APP-282]**, secured respectively by Requirements 15 and 16 in Schedule 2 to the **Draft DCO [APP-016]**. As this boundary feature is not on land under freehold acquisition by the Applicant, the Applicant will discuss options for the most suitable PROW furniture with the relevant landowner(s), as the landowner(s) may reserve the right to have livestock on the field to the south of this feature. This can be secured through the **oPROWPPMP [APP-282]** as secured by Requirement 16 in Schedule 2 to the **Draft DCO [APP-016]**.
WC-245	Socio-Economics, Tourism and Recreation	Public Rights of Way	Outside the Order Limits a) SHER15 Grid Reference ST 86012 85416: There is currently a stone stile in this location. There is potential to install a gate alongside the stone stile to make the Public Footpath more accessible. The ditch will need to be cleared out and the culvert extended.	This feature is not within the Order Limits, and therefore is the responsibility of Wiltshire Council and the relevant landowner(s) to reconcile. Any financial contribution to PROW network upgrades beyond this would have to be agreed through the Community Benefit Fund, which operates and is to be agreed outside of the DCO process.

WC-246	Socio-Economics, Tourism and Recreation	Public Rights of Way	SHER15 Grid Reference ST 86268 8528: There is currently a stone stile in this location, with an electric fence also present. It may be possible to install a gate alongside the stile.	This feature is not within the Order Limits, and therefore is the responsibility of Wiltshire Council and the relevant landowner(s) to reconcile. Any financial contribution to PROW network upgrades beyond this would have to be agreed through the Community Benefit Fund, which operates and is to be agreed outside of the DCO process.
WC-247	Socio-Economics, Tourism and Recreation	Public Rights of Way	Improvement to the verge at the start of SHER14 could provide a couple of spaces for parking. However, care will need to be taken to protect the visibility and access for SHER14.	This feature is not within the Order Limits, and therefore are is responsibility of Wiltshire Council and the relevant landowner(s) to reconcile. Any financial contribution to PROW network upgrades beyond this would have to be agreed through the Community Benefit Fund, which operates and is to be agreed outside of the DCO process. Furthermore, the Applicant proposes a permissive path for pedestrians, equestrians, and cyclists to be accessed from the public highway via an existing field entrance less than 20 m west of SHER14, as set out in **ES Volume 2, Figure 3-4-1 [APP-084]** and controlled through the **OLEMP [APP-283]**. Therefore, the Applicant would seek to ensure than any verge improvements in this location to not adversely affect the accessibility of this proposed permissive route.
WC-248	Socio-Economics, Tourism and Recreation	Public Rights of Way	SHER14 Grid Reference ST 87058 85305: The stile at this location could be replaced with a more accessible piece of access furniture.	This feature is not within the Order Limits, and therefore is the responsibility of Wiltshire Council and the relevant landowner(s) to reconcile. Any financial contribution to PROW network upgrades beyond this would

				have to be agreed through the Community Benefit Fund, which operates and is to be agreed outside of the DCO process.
WC-249	Socio-Economics, Tourism and Recreation	Public Rights of Way	SHER14: There is potential for improvements to the alignment of this Public Footpath perhaps even to upgrade it to a Public Bridleway, which might provide benefits to the public and the landowner.	This route is not within the Order Limits, and therefore is the responsibility of Wiltshire Council and the relevant landowner(s) to reconcile. Any financial contribution to PROW network upgrades beyond this would have to be agreed through the Community Benefit Fund, which operates and is to be agreed outside of the DCO process.
WC-250	Socio-Economics, Tourism and Recreation	Public Rights of Way	NORT5 Grid Reference ST87485 84789: Replace stile with a more accessible piece of access furniture if required for the control of livestock. The sleeper bridge should be widened to improve accessibility or replace it with a culvert. Countryside Access Development Officer to investigate the position of the footpath at this grid reference NORT5 ST 87489 84790: Improvements to the gate and gateway. NORT5: Countryside Access Development Officer to investigate the correct route for the footpath and make sure it is shown correctly on the map.	This feature is not within the Order Limits, and therefore is the responsibility of Wiltshire Council and the relevant landowner(s) to reconcile. Any financial contribution to PROW network upgrades beyond this would have to be agreed through the Community Benefit Fund, which operates and is to be agreed outside of the DCO process.
WC-251	Socio-Economics, Tourism and Recreation	Public Rights of Way	NORT1 ST 88789 84594: Replace sleepers with a new culvert as sleepers are positioned on a gradient, which can make them slippery when wet or if soil is on tread of users' footwear.	This feature is not within the Order Limits, and therefore is the responsibility of Wiltshire Council and the relevant landowner(s) to reconcile. Any financial contribution to PROW network upgrades beyond this would have to be agreed through the

				Community Benefit Fund, which operates and is to be agreed outside of the DCO process.
WC-252	Socio-Economics, Tourism and Recreation	Public Rights of Way	SHER18 may benefit from a diversion as the legal line maybe obstructed. It might be possible to combine this with a diversion of HULL25 to facilitate a more direct route.	The Applicant does not propose permanent PROW diversions from their definitive route. Any diversion to SHER18 may require changes to onsite parameters set out in this DCO Application. The Applicant therefore requests the Countryside Access Team to provide a proposal of any diversion route, so that the Applicant can assess whether this can be accommodated on the Scheme or not. For any part of SHER18 or HULL25 that does not fall within land under freehold acquisition by the Applicant, any changes would be the responsibility of Wiltshire Council and the relevant landowner(s) to reconcile. Any financial contribution to PROW network upgrades beyond this would have to be agreed through the Community Benefit Fund, which operates and is to be agreed outside of the DCO process.
WC-253	Socio-Economics, Tourism and Recreation	Public Rights of Way	HULL23 ST88215 82668: A piece of access furniture should be located here, if required for the control of livestock (the current structure is located at Grid Reference ST8819182646).	This feature is not within the Order Limits, and therefore is the responsibility of Wiltshire Council and the relevant landowner(s) to reconcile. Any financial contribution to PROW network upgrades beyond this would have to be agreed through the Community Benefit Fund, which operates and is to be agreed outside of the DCO process.

WC-254	Socio-Economics, Tourism and Recreation	Public Rights of Way	NORT10 Grid Reference ST 88765 84288: Remove stile if not required for livestock control. If a piece of access furniture is required for stock control, then the least restrictive option should be installed.	This feature is not within the Order Limits, and therefore is the responsibility of Wiltshire Council and the relevant landowner(s) to reconcile. Any financial contribution to PROW network upgrades beyond this would have to be agreed through the Community Benefit Fund, which operates and is to be agreed outside of the DCO process.
WC-255	Socio-Economics, Tourism and Recreation	Public Rights of Way	HULL5 Grid Reference ST 90153 83355: This stile should be removed or replaced with the least restrictive option if a structure is required for the control of livestock.	This feature is not within the Order Limits, and therefore is the responsibility of Wiltshire Council and the relevant landowner(s) to reconcile. Any financial contribution to PROW network upgrades beyond this would have to be agreed through the Community Benefit Fund, which operates and is to be agreed outside of the DCO process.
WC-256	Socio-Economics, Tourism and Recreation	Public Rights of Way	MALW49 Grid Reference ST 91181 83942: Seek removal of redundant stile.	This feature is not within the Order Limits, and therefore is the responsibility of Wiltshire Council and the relevant landowner(s) to reconcile. Any financial contribution to PROW network upgrades beyond this would have to be agreed through the Community Benefit Fund, which operates and is to be agreed outside of the DCO process.
WC-257	Socio-Economics, Tourism and Recreation	Public Rights of Way	HULL8 may be suitable for a diversion to improve connectivity with HULL7.	Whilst within the Order Limits, the route of HULL8 and its stub to HULL7 are not on land under freehold acquisition by the Applicant, the Applicant will discuss options for the most suitable means to ensure this link is properly waymarked and maintained following construction of the Cable Route Corridor in this location. This can be secured through the **oPROWPPMP [APP-282]** as

				secured by Requirement 16 in Schedule 2 to the **Draft DCO [APP-016]** and though agreement with the relevant landowner(s).
WC-258	Socio-Economics, Tourism and Recreation	Public Rights of Way	HULL8 Grid Reference ST 90969 83134: Fill in Armco bridge or replace it with an improved culvert. Replace stile with a more accessible piece of access furniture.	As this boundary feature is not on land under freehold acquisition by the Applicant, the Applicant will discuss options for the most suitable PROW furniture with the relevant landowner(s), as the landowner(s) may reserve the right to have livestock on the fields either side of this feature. This can be secured through the **oPROWPPMP [APP-282]** as secured by Requirement 16 in Schedule 2 to the **Draft DCO [APP-016]**.
WC-259	Socio-Economics, Tourism and Recreation	Public Rights of Way	HULL6 Grid Reference ST 90213 82855: There is a manure heap across the line of the footpath. The path may benefit from a diversion to a more suitable route for land management and public enjoyment.	This route is not within the Order Limits, and therefore is the responsibility of Wiltshire Council and the relevant landowner(s) to reconcile. Any financial contribution to PROW network upgrades beyond this would have to be agreed through the Community Benefit Fund, which operates and is to be agreed outside of the DCO process.

WC-260	Socio-Economics, Tourism and Recreation	Public Rights of Way	HULL6 Grid Reference ST 90236 83245: There is a ditch stone stile and wooden stile. Install a culvert (perhaps dig ditch out to its correct depth), bypass stone stile and remove wooden stile if not required for livestock control. If a structure is required, then replace with a more accessible piece of access furniture.	This feature is not within the Order Limits, and therefore is the responsibility of Wiltshire Council and the relevant landowner(s) to reconcile. Any financial contribution to PROW network upgrades beyond this would have to be agreed through the Community Benefit Fund, which operates and is to be agreed outside of the DCO process.
WC-261	Socio-Economics, Tourism and Recreation	Public Rights of Way	HULL6 Grid Reference ST 90282 83288: There is a gap to side of stile. Install a new way mark post and gap to meet British Standards.	This feature is not within the Order Limits, and therefore is the responsibility of Wiltshire Council and the relevant landowner(s) to reconcile. Any financial contribution to PROW network upgrades beyond this would have to be agreed through the Community Benefit Fund, which operates and is to be agreed outside of the DCO process.
WC-262	Socio-Economics, Tourism and Recreation	Public Rights of Way	MALW53 Grid Reference ST 92033 83339: New sign post required.	As this boundary feature is not on land under freehold acquisition by the Applicant, the Applicant will discuss options for waymarking with the relevant landowner(s). This can be secured through the **oPROWPPMP [APP-282]** as secured by Requirement 16 in Schedule 2 to the **Draft DCO [APP-016]**.
WC-263	Socio-Economics, Tourism and Recreation	Public Rights of Way	MALW55 Grid Reference ST 92882 83520: Replace Armco bridge with a culvert. Replace stile with a piece of more accessible furniture.	This feature is not within the Order Limits, and therefore is responsibility of Wiltshire Council and the relevant landowner(s) to reconcile. Any financial contribution to PROW network upgrades beyond this would have to be agreed through the Community Benefit

				Fund, which operates and is to be agreed outside of the DCO process.
WC-264	Socio-Economics, Tourism and Recreation	Public Rights of Way	MALW55 Grid Reference ST 92780 83429: Replace stile with more accessible furniture.	This feature is not within the Order Limits, and therefore is the responsibility of Wiltshire Council and the relevant landowner(s) to reconcile. Any financial contribution to PROW network upgrades beyond this would have to be agreed through the Community Benefit Fund, which operates and is to be agreed outside of the DCO process.
WC-265	Socio-Economics, Tourism and Recreation	Public Rights of Way	Unclassified Road Grid Reference ST 93173 83237: Install new signpost for the UCR.	New signage or waymarkers can also be provided at this location. As this feature is not on land under freehold acquisition by the Applicant, the Applicant will discuss options for the most suitable signage and signage location with the Countryside Access Team and highways authority. This can be secured through the **oPROWPPMP [APP-282]** as secured by Requirement 16 in Schedule 2 to the **Draft DCO [APP-016]**.

WC-266	Socio-Economics, Tourism and Recreation	Public Rights of Way	MALW53: There is no sign of a stile or gap in the hedge (difficult to see into hedge so there may be one hidden). Replace stile with a more accessible piece of furniture if one is required for the control of livestock. If not, install a gap and way mark. Install a culvert to provide access across the ditch.	The Applicant wishes to clarify with the Countryside Access Team whether the feature described is within or outside the Order Limits, as part of MALW53 falls within the Order Limits of this Scheme.
WC-267	Socio-Economics, Tourism and Recreation	Public Rights of Way	MALW60 Grid Reference ST 92016 82600: Field gate present. Improve way marking.	This feature is not within the Order Limits, and therefore is the responsibility of Wiltshire Council and the relevant landowner(s) to reconcile. Any financial contribution to PROW network upgrades beyond this would have to be agreed through the Community Benefit Fund, which operates and is to be agreed outside of the DCO process.
WC-268	Socio-Economics, Tourism and Recreation	Public Rights of Way	MALW60 Grid Reference ST 92268 82632: Replace stile with a more accessible piece of furniture if one is required for the control of livestock. If not, install a gap and way mark. Install a culvert to provide access across the ditch.	This feature is not within the Order Limits, and therefore is the responsibility of Wiltshire Council and the relevant landowner(s) to reconcile. Any financial contribution to PROW network upgrades beyond this would have to be agreed through the Community Benefit Fund, which operates and is to be agreed outside of the DCO process.

WC-269	Socio-Economics, Tourism and Recreation	Public Rights of Way	MALW68 Grid Reference ST 92978 83005: Replace stile with a more accessible piece of furniture if one is required for the control of livestock. If not, install a gap.	As this feature is not on land under freehold acquisition by the Applicant, the Applicant will discuss options for the most suitable PROW furniture with the relevant landowner(s), as the as the landowner(s) may reserve the right to have livestock on the fields either side of this feature. This can be secured through the **oPROWPPMP [APP-282]** as secured by Requirement 16 in Schedule 2 to the **Draft DCO [APP-016]**.
WC-270	Socio-Economics, Tourism and Recreation	Public Rights of Way	MALW59 Grid Reference ST 92383 82020: Improve the way marking.	This feature is not within the Order Limits, and therefore is the responsibility of Wiltshire Council and the relevant landowner(s) to reconcile. Any financial contribution to PROW network upgrades beyond this would have to be agreed through the Community Benefit Fund, which operates and is to be agreed outside of the DCO process.
WC-271	Socio-Economics, Tourism and Recreation	Public Rights of Way	MALW59 Grid Reference ST 91942 81714: Bridleway gate is wired up so not openable. The ditch here could be culverted to provide a better crossing point. It may also be aspirational to investigate diverting this bridleway away from the farm and its termination point on the A429 to one on Avils Lane. This would provide greater connectivity for the PROW network.	This feature is not within the Order Limits, and therefore is the responsibility of Wiltshire Council and the relevant landowner(s) to reconcile. Any financial contribution to PROW network upgrades beyond this would have to be agreed through the Community Benefit Fund, which operates and is to be agreed outside of the DCO process.
WC-272	Socio-Economics, Tourism and Recreation	Public Rights of Way	MALW65 Grid Reference ST 92860 82462: Access is provided by a stile, although on the day of inspection, the field gate was open. If a structure is required, then the least restrictive option should be used.	As this boundary feature is not on land under freehold acquisition by the Applicant, the Applicant will discuss options for the most suitable PROW furniture with the relevant landowner(s), as the landowner(s) may reserve the right to have livestock on the field to the south of this feature. This can be

				secured through the **oPROWPPMP [APP-282]** as secured by Requirement 16 in Schedule 2 to the **Draft DCO [APP-016]**.
WC-273	Socio-Economics, Tourism and Recreation	Public Rights of Way	MALW64 Grid Reference ST 92850 82160: New sign post required.	A new waymarker can also be provided at this location. As this feature is not on land under freehold acquisition by the Applicant, the Applicant will discuss options for the most suitable location with the Countryside Access Team and relevant landowner(s). This can be secured through the **oPROWPPMP [APP-282]** as secured by Requirement 16 in Schedule 2 to the **Draft DCO [APP-016]**.
WC-274	Socio-Economics, Tourism and Recreation	Public Rights of Way	Further improvements may be required to GSOM11, GSOM15, GSOM9 and GSOM10 once inspected.	These routes are not within the Order Limits, and therefore are the responsibility of Wiltshire Council and the relevant landowner(s) to reconcile. Any financial contribution to PROW network upgrades beyond this would have to be agreed through the Community Benefit Fund, which operates and is to be agreed outside of the DCO process.
WC-275	Socio-Economics, Tourism and Recreation	Public Rights of Way	15.11. The Council also wishes to highlight that the online map for path SHER18 has been amended. The Applicant should contact the Countryside Access Development Officer at Wiltshire Council for an amended plan, as the position of the corridor provided for the Public Footpath may need to be altered.	The Applicant has checked the amended alignment of footpath SHER18 on the Council's PRoW Viewer and considers that the Scheme's design parameters will require amendment to facilitate the new position of the PROW. This will be incorporated into the Scheme with any other alterations proposed or requested during the examination period, and will be published later in the examination

				process as a combined update rather than as incremental changes to documentation. The Applicant is also happy to discuss acquiring updated mapping or GIS data from the Countryside Access Development Officer to ensure that amendments to definitive maps for any PROW that interacts with the Order Limits have been accounted for in the Scheme parameters.
WC-276	Noise and Vibration	Application Documents	16.1. In preparing these comments, the following documents have been reviewed: • ES, Vol 1, 6.1 Chapter 14 Noise and Vibration [APP-066] • ES, Vol 2, 6.2 Figure 14-1-1 Noise Monitoring and Sensitive Receptor Locations [APP-159] • ES, Vol 2, 6.2 Figure 14-2 Daytime Operational Noise Contours [APP-160] • ES, Vol 2, 6.2 Figure 14-3 Night-time Operational Noise Contours [APP-161] • ES, Vol 3, 6.3 Appendix 14-1 Noise and Vibration Legislation, Policy and Guidance [APP-234] • ES, Vol 3, 6.3 Appendix 14-3 Baseline Noise Survey [APP-236] • ES, Vol 3, 6.3 Appendix 14-4 Noise Modelling [APP-237] • Outline Construction Environmental Management Plan (oCEMP) (7.12) [APP-277] • Outline Operational Environmental Management Plan (oOEMP) (7.13) [APP-278]	This comment is noted by the Applicant.

WC-277	Noise and Vibration	Mitigation	Potential Impact and the Need for Mitigation 16.2. The scheme layout has been developed to minimise noise and vibration effects at sensitive receptor locations. The BESS Area and 132kV and 400kV Substations will be located a minimum of 450m and 400m from receptor locations respectively. 16.3. A 2m bund with additional 3m barrier around the eastern and southern boundary of the BESS Area will be incorporated within the design of the Scheme to attenuate noise and to reduce visual impacts.	This comment is noted by the Applicant. Such measures are committed to in Table 8 of the **Outline OEMP [APP-278]**.
WC-278	Noise and Vibration	Mitigation	16.4. Due to potential operational adverse noise effects at noise-sensitive receptors, the following operational mitigation is proposed within the noise assessment (and included within the noise modelling): • Silencer units on 75% (198) of BESS Containers; • Silencer units on all (90) BESS Inverters; • Seven Conversion Units in the vicinity of the BESS Area to have silencers; • All 132kV and 400kV Substation Transformers to be housed in enclosures. 16.5. Table 8 of the Outline Operational Environmental Management Plan (oOEMP) (7.13) [APP-278] sets out the proposed mitigation / measures which will become formal requirements of the Lime Down Solar Park Order via Requirement 14 (Operational Environmental Management Plan). The	This comment is noted by the Applicant. The listed mitigation was applied in the calculation of the of the potential noise levels from the Scheme. There is then a committment to such noise levels within Table 8 of the **Outline OEMP [APP-278]**.

			ES, Vol 1, 6.1 Chapter 14 Noise and Vibration [APP-066] report confirms that with the oOEMP in place, the effects arising from the operation and maintenance of the Scheme are likely to be not significant during both the daytime and night-time periods.	
WC-279	Noise and Vibration	Construction Mitigation Measures	Evaluation of the Proposed Construction Mitigation Measures 16.6. Further analysis of noise levels is required. Cable Route Connection 16.7. No SOAEL impacts have been identified for daytime construction activities (excluding HDD) except for residential properties at Silver Street, Gastard (R58). However, Table 8 of the OCEMP [APP-277] makes no mention of contacting the residential occupiers on Silver Street prior to construction of the cable route corridor to inform them of the timing and duration of any construction activities taking place in their vicinity, despite this being identified as a measure within the Noise and Vibration Assessment (Chapter 14 of the ES) [APP-066]. As part of the communication strategy, residential dwellings on Silver Street must be informed of dates, times and duration of any construction activities taking place in the vicinity of their residence. Table 8 [APP-277] should therefore be amended to include this as a specific measure.	The comment on construction mitigation measures is noted by the Applicant and its contents are agreed. While the SOAEL is reached at Silver Street, Gastard (R58) under a worst-case assessment, it is not exceeded and Paragraph 14.10.11 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]** clarifies that, with the embedded mitigation in place, levels are expected to be below the SOAEL. While not mentioning Silver Street explicitly, Table 8 of the **Outline CEMP [APP-277]** does state that there will be the "*Provision of information to the local authority and local residents to advise of potential noisy works that are due to take place*." Table 8 further clarifies that "*The detailed CEMP(s) will also set out a scheme for the provision of monthly reporting information to and from local residents to advise of potential noisy works that are due to take place and for monitoring of noise complaints and reporting to the Applicant for immediate investigation and action. Further details are to be confirmed in the detailed CEMP(s)*." The Applicant has appended this text in the **Outline CEMP [APP-277]** with an assurance that "*Such a*

				scheme would include informing residents in locations identified in Chapter 14: Noise and Vibration of the ES, including Silver Street, of dates, times and duration of construction activities in their vicinity."
WC-280	Noise and Vibration	Construction Mitigation Measures	HDD and Nighttime Construction Noise 16.8. ES, Vol 3, 6.3 Appendix 14-4: Noise Modelling [APP-237] confirms that Sound Power Level of plant applicable to HDD activities is likely to cause significant effects (an exceedance of SOAEL) during the night at the majority of identified sensitive receptors within 500m of activities. The Noise and Vibration Assessment (Chapter 14 of the ES) [APP-066] identifies 13 residential dwellings where noise levels are expected to exceed SOAEL for a three day period and states that 'temporary acoustic fencing will be installed around the HDD site boundary to screen these receptors from noise emissions depending on the location, plant and timing of works'.	This comment is noted by the Applicant, and its contents are agreed.
WC-281	Noise and Vibration	Construction Mitigation Measures	16.9. However, Table 8 of the OCEMP [APP-277] states that "*depending on the location, plant and timing of works, temporary acoustic fencing will be installed around the HDD site boundary to screen receptors from noise emission*". This negatively worded commitment should be amended to one	The Applicant accepts the suggested change in wording and has updated Table 8 of the **Outline CEMP [APP-277]** accordingly.

			that is positively worded, for example - '*Temporary acoustic fencing provides up to 10dB of attenuation. Temporary acoustic fencing will be installed around the HDD boundary to screen those receptors identified as having an 'above SOAEL' effect level as set out in Table 14-20 HDD Locations and Receptors of the Noise and Vibration Assessment (Chapter 14 of the ES)*'.	
WC-282	Noise and Vibration	Operational Noise Mitigation Measures	Evaluation of Proposed Operational Noise Mitigation Measures 16.10. The oOEMP [APP-278] commits to the resulting levels set out in the noise assessment at properties to provide reassurance that the Scheme as built will not lead to significant effects from noise. Table 8 of the oOEMP sets out the proposed measures which will become formal requirements of the Lime Down Solar Park Order via Requirement 14 (Operational Environmental Management Plan). 16.11. As such, it is imperative that there is a full commitment to the following operational mitigation used in the predictive modelling to support the results presented within the ES Chapter 14 Noise and Vibration Assessment is included within Table 8: • Silencer units on 75% (198) of BESS Containers; • Silencer units on all (90) BESS Inverters; • Seven Conversion Units in the vicinity of the BESS Area to have silencers; • All 132kV and 400kV Substation Transformers to be housed in enclosures.	The **Outline OEMP [APP-278]** purposely does not commit to specific plant mitigation to allow for design flexibility, given the technological changes likely between the time of the assessment and operation of the Scheme. For example, if quieter BESS inverters or Conversion units can be used the number of silencers could be over specified, and conversely if louder units are required, additional mitigation would be necessary. The assessment reported in **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]** demonstrates that noise levels that are not significant can be achieved with appropriate mitigation and the **Outline OEMP [APP-278]** commits to this by stating "*…noise at sensitive receptors will be no higher than the levels presented in Section 14.10 of Chapter 14: Noise and Vibration of the ES and these levels will be set out in the detailed OEMP".* This commitment will be met through a remodelling of the Scheme once the design is finalised. The calculated levels at properties would then inform the precise level of mitigation required

			• BESS Area to be located at least 450m and 132kV and 400kV Substations located at least 400 m from receptor locations 16.12. Unfortunately, Table 8 of the oOEMP [APP-278] does not provide the required level of precision necessary to ensure that the required level of mitigation is secured via Requirement 14 of the draft Order because it does not specify the % or number of silencer units for BESS containers, BESS inverters or Conversion units, nor does it specify that all 132kv and 400kv substation transformers will be housed in enclosures. As such, no firm commitments are given in relation to minimum mitigation requirements. By not committing to specific mitigation and actions, it will not be possible for the council to identify whether the necessary mitigation required to protect amenity has been installed.	to meet the levels presented in the ES. The outcome of such an exercise would be reported to the relevant planning authority to confirm that significant levels of noise from the Scheme have been avoided. Extra wording has been added to the **Outline OEMP [APP-278]** to clarify this point. This is a common approach, focussing directly on the end goal of low noise levels, that has been adopted in consented Schemes such as the Tillbridge Solar Project (The Tillbridge Solar Order 2025, SI 2025 No.1105).

<table>
<tr>
<td>WC-283</td>
<td>Noise and Vibration</td>
<td>Operational Noise Mitigation Measures</td>
<td>16.13. Table 8 of Appendix 14-4 Noise Modelling [APP-237] shows that there is one receptor (R10) that has been classed as SOAEL* (+5dB above the background LA90) for daytime operational noise. BS 4142:2014 states that a difference of +5 dB is likely to be an indication of an adverse impact. However, table 14-23 Operational Noise Results Summary states that no daytime receptors are above SOAEL. This is a significant discrepancy and as a result, the council requires the following for R10:
• A breakdown of each operational noise source i.e. conversion units, solar PV panels (tracking structures), transformers and battery inverters that contributes towards daytime noise levels;
• A BS4142 rating calculation; and
• Additional analysis setting out proposed mitigation in order to ensure daytime levels fall <5dB.

*The rating level is also predicted to be +5dB (SOAEL) above the LA90 at night for R10 and R20. However, table 14-23 Operational Noise Results Summary states that no nighttime receptors are above SOAEL. It is acknowledged in this case that that this is a nighttime period and that noise generated by the solar farm within bedrooms at these two receptors with a window partially open window will be 20-25dB (assuming a 10-15dB reduction for a partially opened window) and well below levels outlined in WHO Community Guideline and BS8233. As such, it is agreed that</td>
<td>Calculated levels at R10 are less than 5 dB above the background and not above SOAEL. However, when rounded to the nearest decibel, they are 5 dB above background and at the SOAEL, as reported in Table 8 of ES Volume 3, Appendix 14-4: Noise Modelling [APP-237]. The Applicant accepts that this could appear as a discrepancy and, for clarity, has provided a breakdown of the daytime operational noise sources at R10 in the table below.

This shows that the central BESS area is the dominant noise source at R10. Additional analysis indicates that a level below SOAEL, even when rounded, could be achieved with 85% of the BESS containers being fitted with air-cooled heat exchangers (as opposed to the 75% reported in the ES). This would bring the contribution of the BESS containers in the table below to less than 27 dB and the rating level in the right-hand column down to 34 dB.

While the Applicant is not committing to this mitigation explicitly, to maintain design flexibility (as described in the response above), the Outline OEMP [APP-278] has been amended to clarify that levels at all receptors from the final design would be below SOAEL.
<table>
<tr><th>Receptor</th><th>Source Group</th><th>Source Contribution at R10</th><th>BS4142 Correction</th><th>Daytime Sound Level</th><th>Rating Level</th></tr>
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<td>the noise impacts for R10 and R20 are not significant despite the rating level of sound being +5dB above the background LA90.</td>
<td>
<table>
<tr><td rowspan="5">R10</td><td>BESS Inverter</td><td>28.3</td><td>3</td><td>31.3</td><td rowspan="5">35</td></tr>
<tr><td>BESS Container</td><td>27.9</td><td>3</td><td>30.9</td></tr>
<tr><td>Conversion Unit</td><td>24.4</td><td>3</td><td>27.4</td></tr>
<tr><td>400kV Substation</td><td>3.4</td><td>3</td><td>3.4</td></tr>
<tr><td>132kV Substation</td><td>-20.1</td><td>3</td><td>-17.1</td></tr>
</table>
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</tr>
<tr>
<td>WC-284</td>
<td>Noise and Vibration</td>
<td>Operational Noise Mitigation Measures</td>
<td>16.14.
Table 8 of the oOEMP [APP-278] details monitoring requirements to ‘ensure that plant noise at sensitive receptors throughout the operational lifetime of the Scheme is not materially worse than the levels presented in the ES’. A commitment is then given to submit noise monitoring results to the relevant planning authority for review and ‘where this review indicates plant noise levels generated by the Scheme have materially increased, the undertaker and relevant planning authority will liaise in respect of any further maintenance or mitigation required to reduce levels at receptors back to those presented in the ES’.</td>
<td>The Applicant notes this comment and agrees with its contents.</td>
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WC-285	Noise and Vibration	Operational Noise Mitigation Measures	16.15. This commitment does not go far enough. No details are provided concerning: a) where the monitoring will be undertaken b) timescales concerning the location and frequency of monitoring c) how frequently the monitoring data will be submitted to the local authority d) the timescales the developer will undertake further maintenance or mitigation when the review indicates plant noise levels have exceeded acceptable levels as identified in the ES.	The Applicant has amended the **Outline OEMP [APP-278]** to address these matters. In summary: (a) The monitoring will be undertaken as close as practicable to the BESS units, inverters and transformers. Measured data can then be directly compared to modelled data and plant specification sheets to understand if there has been a change. This is the only approach suitable for determining whether changes in noise are due to the Scheme. Variations in sound level at properties for example could be the result of changes in background sound sources or local meteorology rather than changes in plant noise associated with the Scheme. (b) The monitoring would be completed on an annual basis, under reasonable worst-case conditions during summer months, at the same time as regular maintenance. (c) Monitoring data will also be submitted to the local authority on an annual basis, within 4 weeks of the data collection. (d) When the review indicates that plant noise has increased beyond acceptable levels the operator will include details of the next steps to be taken to address the issue in the report to the local authority. The exact timescales for future maintenance or mitigation are likely to depend on the details of the cause of the exceedance. Further details will be provided in the

				final OEMP. This will be in substantial accord with the **Outline OEMP [APP-278]** and is secured in the **Draft DCO [APP-016]**.
WC-286	Air Quality	Application Documents	Air Quality / Dust 16.16. In preparing these comments, the following documents have been reviewed: • ES, Vol 1, 6.1 Chapter 15 Air Quality [APP-067] • ES, Vol 2, 6.2 Figure 15-6 Air Quality Baseline [APP-167] • ES, Vol 2, 6.2 Figure 15-1 Construction Dust Emissions Study Area [APP-162] • ES, Vol 3, 6.3 Appendix 15-1 Construction Dust Methodology and Assessment [APP-238] • Outline Construction Environmental Management Plan (OCEMP) (7.12) [APP-277]	The Applicant notes this comment.
WC-287	Air Quality	Mitigation	Potential Impacts and the Need for Mitigation 16.17. The proposed scheme has the potential to adversely affect air quality during the construction and decommissioning phases in the following ways: • Dust generated during the construction, operation and maintenance and decommissioning phases; • Vehicle emissions during the construction, operation and maintenance and decommissioning phases; • Emissions from Non-Road Mobile	The Applicant concurs with Wiltshire Council's assessment of the potential impacts as set out in **Chapter 15: Air Quality [APP-067]**.

			Machinery (NRMM) (onsite plant) during the construction, operation and maintenance and decommissioning phases; • Back-up generator emissions during the operation and maintenance phase.	
WC-288	Air Quality	Mitigation	16.18. Mitigation to control dust impacts are set out in Table 14 of Appendix 15-1 Construction Dust Methodology and Assessment [APP-238] and includes but is not limited to: • Communications Strategy - develop and implement a stakeholder communications plan that includes community engagement before work commences on site and site notice with relevant contact names and telephone numbers. • Dust Management - develop and implement a Dust Management Plan (DMP) • Site Management – recording of all dust and air quality complaints and ensure that corrective actions are taken where possible • Regular liaison meetings with other high risk construction sites within 500m of the site boundary, to ensure plans are coordinated and dust and particulate matter emissions are minimised. • Monitoring – undertake and record daily on-site and off-site inspection,	The Applicant concurs with Wiltshire Council's summary of dust mitigation measures as set out in **ES Volume 3, Appendix 15-1 Construction Dust Methodology and Assessment [APP-238]**.

			where receptors (including roads) are nearby, to monitor dust in accordance with the DMP. More intensive monitoring to be undertaken during periods of dry / windy weather. Carry out baseline monitoring and agree dust deposition, dust flux, or real-time PM10 continuous monitoring locations with the local authority. • Preparing, maintaining and operating the site – taking of specific measures to minimise airborne dust and site runoff.	
WC-289	Air Quality	Mitigation	16.19. Table 9 of the OCEMP [APP-277] sets out the proposed mitigation / measures which will become formal requirements of the Lime Down Solar Park Order via Requirement 13 (Construction Environmental Management Plan). The ES Chapter 15 Air Quality [APP-067] report confirms that with the oCEMP in place, the effects arising from the operation and maintenance of the Scheme are likely to be not significant.	The Applicant concurs with Wiltshire Council's assessment of the residual effects as set out in **ES Volume 1, Chapter 15: Air Quality [APP-067]**. The ES concludes that no significant Air Quality effects are anticipated at any stage of the Scheme's lifetime.
WC-290	Air Quality	Construction and Decommissioning Mitigation	Evaluation of the Proposed Construction / Decommissioning Air Quality Mitigation Measures 16.20. Following review of the submitted oCEMP, it appears to be broadly satisfactory for the purposes of controlling unacceptable air quality impacts associated with the construction and demolition phases of the development.	The Applicant welcomes the Council's confirmation that the **Outline CEMP [APP-277]** is satisfactory in controlling potential Air Quality impacts during construction and decommissioning. The measures will be secured through Requirement 13 of the **draft DCO [APP-016]**, ensuring they will be fully implemented.

WC-291	Glint and Glare	Applicatio Documents	16.21. In preparing these comments, the following documents have been reviewed: • ES, Vol 1, 6.1 Chapter 20 Other Environmental Matters [APP-072] • ES, Vol 3, 6.3 Appendix 20-4 Solar Photovoltaic Glint and Glare Study [APP-261] • Outline Operational Environmental Management Plan (oOEMP) (7.13) [APP-278]	The Applicant notes this comment.

WC-292	Glint and Glare	Mitigation	16.22. The proposed Scheme has the potential to adversely affect residential sensitive receptors during the operational phases in the following ways: 16.23. Table 11 of Appendix 20-4 Solar Photovoltaic Glint and Glare Study [APP-261] confirms that for fixed south-facing panels, the predicted worst-case scenario is for solar reflections to occur for more than three months per year but less than 60 minutes in any given day. For the vast majority of receptors, screening in the form of existing vegetation and / or intervening terrain is predicted to obstruct views of reflecting panels. However, for receptors 24 and 39 the existing vegetation is not currently at a sufficient height (approximately 2m in 2025) to screen views from the ground floor of these dwellings, however it is predicted that vegetation heights will increase to levels necessary to provide partial screening.	The Applicant notes the Council's summary of **ES Volume 3, Appendix 20-4 Solar Photovoltaic Glint and Glare Study [APP-261]**. As identified in Table 11, while worst-case reflections from fixed south-facing panels may occur for short durations on some days of the year, the assessment confirms that no significant effects are predicted for any residential receptors. For receptor 24, where existing vegetation is not yet at full screening height, the assessment already accounts for expected growth, and partial screening will be achieved as vegetation matures. These effects are therefore temporary, limited in duration, and not significant, with no additional mitigation required beyond that already embedded within the Scheme design. It should be noted that receptor 39 has been modelled as having '*Solar reflections geometrically possible for less than 3 months per year and less than 60 minutes on any given day*' for fixed south-facing panels. However, the Applicant notes residential receptor does fall into the same category as receptor 24 for single axis tracking panels. The same reasoning as presented above regarding vegetation growth and effect conclusions also apply in this instance.

WC-293	Glint and Glare	Mitigation	16.24. For single axis tracking panels, no significant impacts are predicted, and no mitigation is proposed. Solar reflections either occur for less than three months per year and 60 minutes on any given day, or occur for more than three months per year and are significantly screened by existing vegetation and / or intervening terrain. 16.25. The Applicant advised that further mitigation is therefore not required on the basis of this predicted increase in vegetation height.	The Applicant concurs with Wiltshire Council's summary of the effects pertaining to the single axis tracking panels as set out in **ES Volume 3, Appendix 20-4: Solar Photovoltaic Glint and Glare Study [APP-261]**.

WC-294	Glint and Glare	Mitigation	Glint / Glare Impacts – Mitigation Proposed 16.26. It is assumed that natural vegetation screening will reach approximately 3.2m by the operation and maintenance phase when panels will be in situ. This is deemed sufficient to protect amenity and therefore no additional screening mitigation is proposed. 16.27. A Commitment has been given to use 2.5m 1P fixed south-facing panels in field B11.	The Applicant notes this comment.

WC-295	Glint and Glare	Mitigation	Evaluation of Proposed Glint and Glare Mitigation Measures 16.28. In order to consider the sufficiency of the proposed glint and glare mitigation, clarity on the following points is required: a) How the Applicant has calculated that the height of natural vegetation will reach 3.2m and what assumptions is this figure based on. b) How the impact of natural vegetation being 3.2m in height affects the significance thresholds as set out in the flow chart on page 114 of Appendix 20-4 Solar Photovoltaic Glint and Glare Study [APP-261].	The assumptions utilised for vegetation reaching a height of 3.2m are based on the current height of vegetation (2m in 2025) and annual growth of 0.4m per year, from now until the operational phase (2028). 3 years of growth of 0.4m per year results in 1.2m of growth to the current height of vegetation (2m in 2025) resulting in vegetation reaching 3.2m in height. This methodology is set out within the future baseline section, specifically paragraph 20.5.31) of **ES Volume 1, Chapter 20: Other Environmental Matters [APP-072]**. Vegetation will then be maintained at a height sufficient to screen views from the primary living space of dwelling receptor 24 throughout the operational phase. Once the vegetation reaches 3.2m in height, solar reflections would no longer be both geometrically possible and visible and therefore no significant impact would be predicted.
WC-296	Other Environmental Matters	Fire Safety	17. Fire Safety of Battery Energy Storage System (BESS) Considerations 17.1. The proposal is described as containing approximately 270 BESS containers and associated inverters, transformers mounted on concrete foundations, along with other ancillary equipment. The BESS area is shown as being located North of the line of the railway and the existing solar farm at Hill Hayes	The Applicant notes this response.

			Lane, Hullavington and extending to a site area of 5.5Ha.	
WC-297	Other Environmental Matters	Fire Safety	17.2. Within the submitted ES Vol 3, 6.3 Appendix 3-1 Substations and Battery Energy Storage System Description [APP-182], the "*containers*" are described as a proprietary product of typical appearance, but this document also notes that other products may be used, with the product referenced providing a maximum envelope for the purposes of landscape and visual assessment and represents a reasonable worse case for the purposes of the noise assessment. The submitted design parameters set out in the Environmental Statement suggest the containers will scale at some 4.5m in height with a foundation at 4.0m depth. The submission also confirms that the containers are to be laid out with 3.5 m between blocks and 0.9 m between adjacent and back-to-back containers.	The Applicant notes this response.

WC-298	Other Environmental Matters	Fire Safety	17.3. The submission acknowledges that there may be some potential for fire(s) as a result of the BESS elements of the development. Although rare, fires and associated explosions have the potential to cause safety concerns to human health, including anyone working on site, or within the area of fire spread / associated contamination fall out. Fires also have the potential to have an impact on the natural environment including the habitats and species on site and surrounding area.	The Applicant's **Outline Battery Safety Management Plan (OBSMP) [APP-286]** covers all requisite credible BESS fire safety considerations. Section 2.4 of the **OBSMP [APP-286]** outlines the key safety objectives for the Scheme, to ensure that all on site safety risks are prevented or fully mitigated and that there will be no significant off-site impacts on all sensitive receptors. The Applicant's **BESS Fire Emissions Modelling Report [APP-239]** assesses BESS fire emissions impacts on all sensitive receptors within a 1km radius of the BESS site. The fire emissions modelled in the report were based upon recent UKHSA requests for DCO projects. The BESS layout has been developed in consultation with the Dorset Fire and Rescue Service (DFRS) and has taken account of guidance from the NFCC. Communication with the DFRS will continue through the detailed design and construction stages. It should be noted that a SoCG is currently under preparation with DFRS which will include matters relating to fire safety.

WC-299	Other Environmental Matters	Fire Safety	17.4. ES Vol 3, 6.3 Appendix 3-1 Substations and Battery Energy Storage System Description [APP-182] confirms that each BESS container will be fitted with a Thermal Management System so as to keep the internal battery temperature in an operational range, as well as a Fire Suppression System, which ventilates smoke and water based fire / explosion suppression. 17.5. Separately, the Draft Development Consent Order [APP-016] commits to the submission and agreement of a Battery Safety Management Plan prior to the commencement of development. The draft DCO also commits the Local Planning Authority to consultation with the Dorset and Wiltshire Fire and Rescue Service along with the Environment Agency. 17.6. Wiltshire Council does not retain in-house expertise to comment on the adequacy of the approach to minimise and mitigate the risk and effect of fire. However, there is no evidence to suggest that the Applicant has not developed the layout and proposed safety systems in line with the National Fire Chiefs Council (NFCC) Guidance and NFPA 855 (2023) standards, as is stated in Volume 3 to the Environmental Statement. Equally, there is no reason to believe that the proposed systems will not operate correctly and to render the development as safe as it can be. (as is referenced in the PPG).	The Applicant notes these comments.

WC-300	Other Environmental Matters	Fire Safety	17.7. The council is, however, confused by the apparent insertion of the word "*optional*" placed in brackets after Fire Suppression System as it is listed in paragraph 1.2.1 to Appendix 3-1 to the submitted Environmental Statement **[APP-182]**. This appears to run contrary to later paragraphs where the Fire Suppression System appears to be embedded in the proposed design of the BESS. The Applicant will need to explain this apparent conflict prior to any decision.	NFCC revised guidance (2026) recognises that BESS designs often do not incorporate an automatic fire suppression system because they are designed to safely burn out to remove the risk of stranded energy in the battery systems. However, the Applicant will amend section 1.2.6 of **ES Volume 3, 6.3 Appendix 3-1 Substations and Battery Energy Storage System Description [APP-182]** at Deadline 1 to integrate NFPA 855 (2026) amendments and to clarify fire suppression system requirements. The requirement for a fire suppression system will only be decided at the detailed design stage when the BESS system is selected, compulsory Large Scale Fire Testing (LSFT) of the BESS design will determine the requirement for an integrated fire suppression system. The **OBSMP [APP-286]** stipulates that the final BESS design and site layout will have been validated through mandatory Large Scale Fire Testing (LSFT) and rigorous consequence modelling to minimise the requirement for any FRS intervention in a thermal runaway incident. LSFT must establish minimum equipment spacing distances that demonstrate there is no fire propagation to adjacent BESS enclosures or Energy Storage System (ESS) equipment. The following will be added to the 'Fire Suppression System' heading in **Appendix 3-1 Substations and**

				Battery Energy Storage System Description [APP-182]: • **As a minimum**, a BESS Combustible Concentration Reduction (CCR) system will comply with NFPA 855 (2026) (Ref 1) NFPA 69 (Ref 1) guidelines which require activation at no more than 10% of the Lower Explosive Limit (LEL) of the explosive gas(es). The CCR must ensure the prevention of a dangerous build-up of explosive gases (on average 25% LEL within the BESS); and • **An optional** BESS water based fixed suppression system (automatic or dry pipe) or Thermal Runaway Propagation Prevention (TRPP) system (engineered to directly access cells within battery modules).

WC-301	Socio-Economics, Tourism and Recreation	Economic Policy Considerations	18.1. The relevant policies for this scheme are: Core Policy 34 Additional Employment Land Outside the Principal Settlements, Market Towns and Local Service Centres, developments will be supported that: are considered essential to the wider strategic interest of the economic development of Wiltshire, as determined by the council… Where they: a) meet sustainable development objectives as set out in the polices of this Core Strategy and are supported by evidence that they are required to benefit the local economic and social needs and are supported by adequate infrastructure Core Policy 42: Standalone Renewable Energy Installations. Proposals for standalone renewable energy schemes will be supported subject to satisfactory resolution of all site specific constraints. In particular, proposals will need to demonstrate how impacts on the following factors have been satisfactorily assessed, including any cumulative effects, and taken into account: i. The landscape, particularly in and around AONBs ii. The Western Wiltshire Green Belt iii. The New Forest National Park iv. Biodiversity v. The historic environment including the Stonehenge and Avebury World Heritage Site and its setting vi. Use of the local transport network vii. Residential amenity, including noise,	The Applicant notes these comments, and has considered local policies in **ES Volume 3, Appendix 16-1: Socio-Economics, Tourism and Recreation, Legislation, Policy, Guidance and Supporting Information [APP-240]** and the **Planning Statement [APP-267]**.

			odour, visual amenity and safety viii. Best and most versatile agricultural land. 18.2. Applicants will not be required to justify the overall need for renewable energy development, either in a national or local context. 18.3. It is noted that as this is a nationally significant infrastructure project some of the more local policy considerations are superseded.	
WC-302	Socio-Economics, Tourism and Recreation	Economic Impact	18.4. It is considered that the main positive economic impact of the scheme will be during the two-year construction of the solar park, followed approximately thirty years later by the decommissioning of the original solar panels and the installation of new ones. Currently it is planned to return the land to agricultural use at the conclusion of the scheme in sixty years' time.	The Applicant considers this an accurate representation of the key phases for the Scheme, and the assessed socio-economic effects from these phases.

WC-303	Socio-Economics, Tourism and Recreation	Employment	18.5. The methodology used to predict employment numbers during the construction phase is not disputed (ES, Vol 1, 6.1 Chapter 16 Socio-Economics, Tourism and Recreation) [APP-068]. The council are also pleased to note the comprehensive Outline Skills, Supply Chain and Employment Plan (7.20) [APP-285] which if implemented in full, will help to achieve the local employment figures stated. 18.6. The Applicant suggests that up to 20 FTE jobs will be lost in the agricultural sector due to the change of use of the land. Whilst this is disappointing, there is a shortage of agricultural staff so if this is the case, it is not felt that they will find it hard to find alternative employment in the sector. It could be the case that the loss of land on some holdings, particularly on tenanted farms, may make the holding unviable, however this level of detail is not available to the council. 18.7. The Applicant also states that there could be a loss of up to 50 FTE jobs in the tourism and leisure sector during construction, reducing to 11 FTE jobs lost once the scheme is constructed and operational. The initial job losses during the construction phase are significant and in the council's view, it will be a number of years post construction for these jobs to come back. The Applicant's offer of retraining schemes to allow those effected to work on the project, but this will only help in the short term of the construction phase.	The Applicant confirms these comments report on the assessment findings in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]**. Where losses to agriculture and tourism employment have been identified, these are worst-case estimates based on likely significant effects from the Scheme, and do not include additional mitigation measures being applied. The Applicant does not however agree that this effect on tourism employment is significant, accounting for less than 0.7% of tourism-based employment within 5 km of the Scheme (BRES, 2023 data), and approximately 0.17% of tourism employment across Wiltshire (Visit Wiltshire, 2021). This is also a temporary effect, anticipated to occur during construction, with recovery to tourism businesses anticipated to begin as soon as construction works are complete. The Applicant has been in discussions with landowners and these discussions have included arrangements regarding existing tenancies. Additional mitigation measures through the **Outline Skills, Supply Chain and Employment Plan (OSSCEP) [APP-285]** seek to reduce agriculture and tourism employment losses through focusing on local recruitment, sourcing ways of retaining agricultural workers, promoting local suppliers where practicable, and through providing

				retraining opportunities for workers in agriculture or tourism-dependent industries. The Applicant seeks to clarify that the measures in the OSSCEP are intended to be implemented throughout construction and the operational lifetime of the Scheme to support ongoing skills and employment opportunities. While retraining opportunities would largely focus on disciplines related to the Scheme (such as engineering, logistics, and land management), retraining into other industries adjacent or similar to agriculture or tourism-based employment is not excluded from this offer and are therefore able to be provided beyond just direct construction employment and skills.
WC-304	Socio-Economics, Tourism and Recreation	Economic Impact	Economic Impact 18.8. The Applicant has provided a range of figures on increased GVA for the local area and nationally, both during the construction and decommissioning phases and for when the scheme is operational, which are positive, particularly during construction and decommissioning periods.	The Applicant considers these comments an accurate reflection of the assessment findings in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]**.
WC-305	Socio-Economics, Tourism and Recreation	Tourism	18.9. The council has only recently had the opportunity to review the Applicant's assessment on the impact on tourism in the area. This is a comprehensive piece of work identifying all the tourist sites, rights of way, recreational areas and conservation areas that could be impacted. However, it would have been helpful to have had this submission earlier in the process.	The Applicant notes this comment. Prior to submission, the Applicant had sought to find opportunity to share this assessment piece with Wiltshire Council's Economic Development team. Unfortunately, this was unable to be achieved prior to DCO submission. The Applicant would therefore like to invite the Economic Development team to take part in discussions on any matters of relevance, which can be recorded and resolved through the process of

				agreeing Statement of Common Ground.
WC-306	Socio-Economics, Tourism and Recreation Transport and Access	Tourism	18.10. Other than the visual impact of the solar panels, the most significant impact will be from the additional traffic during the construction of the solar park and the laying of the connector cables. This is likely to cause considerable delays for both tourists and residents despite the Applicant's best efforts to mitigate this. This will occur over a period of approximately two years for the initial construction, and will result in, according to the Applicant's analysis, the loss of 50 FTE jobs from the tourism sector, reducing to 11 once the construction is completed. It will also result in a reduction of at least £1.76m per year of tourist spending during the construction phase, reducing to £395,000 per year once construction is completed. These are not insignificant sums and, in the council's view, will have an impact on the viability of tourist and leisure facilities in the area (ES, Vol 1, 6.1 Chapter 16 Socio-Economics, Tourism and Recreation) [APP-068].	The Applicant acknowledges traffic and delay are likely to have some effect on tourism and residents in the affected area. However, the Applicant is confident that the mitigation measures put in place through the **OCEMP [APP-277]** and **OCTMP [APP-287]** as secured through Requirements 13 and 15 (respectively) of Schedule 2 to the **Draft DCO [APP-016]** are sufficient to minimise the significance of these effects. Where losses to tourism have been identified, these are worst-case estimates based on likely significant effects from the Scheme as assessed in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]**, and do not include for additional mitigation measures being applied. The Applicant does not however agree that this effect on GVA in tourism-dependent industries is significant, accounting for (at worst) less than 0.15% of the value of the combined tourism industry in Wiltshire (£1.2 billion estimated from Visit Wiltshire, 2021). This is also a temporary effect, anticipated to occur during construction, with recovery to tourism businesses anticipated to begin as soon as construction works are complete. Additional mitigation measures set out through the **OCEMP [APP-277]**, and **oPROWPPMP [APP-**

				282] (the latter secured by Requirement 16 in Schedule 2 to the **Draft DCO [APP-016]**) seek to reduce impacts upon tourism receptors to mitigate against impacts on the viability of tourism and leisure facilities.
WC-307	Socio-Economics, Tourism and Recreation	Tourism	18.11. The inclusion of the impact on tourism has resulted in a significant reduction in the increase in GVA for the local area, from £1.8m per year to £1.46m per year once construction is completed. When the £1.5m per year anticipated payment that is due to be paid to landowners is taken into account, it would appear that the rest of the local economy will be negatively impacted, with leisure and tourism businesses particularly affected.	The Applicant considers these comments an accurate reflection of the assessment findings in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]**. Where losses to agriculture and tourism have been identified, these are worst-case estimates based on likely significant effects from the Scheme. Additional mitigation measures through the **OSSCEP [APP-285]** seek to reduce these losses through focusing on local recruitment, promoting local suppliers where practicable, and through providing retraining opportunities for workers in agriculture or tourism-dependent industries. It is considered that these measures would help to reduce local losses in the local economy, and help to generate additional GVA in the local economy in alternative industries. The OSSCEP is secured by Requirement 18 in Schedule 2 to the **Draft DCO [APP-016]**.

WC-308	Socio-Economics, Tourism and Recreation	Economic Impact	18.12. It is the council's opinion that whilst this development will help with the economic viability of a number of farm businesses, a significant number of other businesses will be impacted negatively and overall business activity in the area will fall. This is contrary to Wiltshire's core strategy of maintaining and increasing job numbers.	The Applicant does not agree that the anticipated effects to businesses as a result of the Scheme are significant, as the anticipated worst-case loss to GVA in tourism-dependent industries accounts for less than 0.15% of the value of the combined tourism industry in Wiltshire. Furthermore, this is a worst-case assessment of a temporary impact on tourism during the construction phase of the Scheme. The Applicant has sought to minimise long-term adverse effects on local businesses through the mitigation measures set out in the **OOEMP [APP-278]**, **OCTMP [APP-287]**, and **oPROWPPMP [APP-282]**, secured respectively by Requirements 14, 15, and 16 in Schedule 2 to the **Draft DCO [APP-016]**. The Applicant is furthermore committed to skills, employment and business enhancement measures as set out in the **OSSCEP [APP-285]**, secured by Requirement 18 in Schedule 2 to the **Draft DCO [APP-016]**, to help increase business activity and local skill capabilities in Wiltshire during the operational lifetime of the Scheme.
WC-309	Socio-Economics, Tourism and Recreation	Recreation	Recreation 18.13. There are a significant number of permissive rights of ways that will be impacted by this project, both in the solar park and along the route of the cable connection. However, as the exact route of the cable connector has yet to be determined, exactly which PRoW's will be impacted is impossible to determine. The Applicant considers the impact to be either moderate /	Permissive access routes that are not mapped on publicly available resources, or permissive access routes that have not been disclosed to the Applicant by respective landowners, have not been included in the Scheme. Notwithstanding that, the Applicant has committed to providing permissive paths on the Solar PV sites to improve countryside accessibility. These are shown on **ES Volume 2, Figures 3-4-1**

			minor adverse effect or, predominantly, minor adverse effect. Whether those wishing to use these PRoW's will be of the same mind is a moot point. The council considers that a considerable amount of work will have to be done, particularly with the PRoW's affected within the solar park, to ensure that the ability of local residents and other uses of these PRoW's to enjoy the full benefits that are currently available continue if this project is consented.	**to 3-4-5.2 Landscape and Ecology Mitigation Plans [APP-084]**. Although the final Grid Connection Cable route is yet to be finalised, the Applicant has assessed a worst-case scenario where all PROWs within the Cable Route Corridor are assessed as if the cable may cross them. This has been done to ensure the assessment findings set out in **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]** are as robust as feasible. The Applicant understands that maintaining functional and beneficial access to PROWs is extremely important to local people, and has committed to the mitigation measures in the **OCEMP [APP-277]**, **OOEMP [APP-278]**, **OCTMP [APP-287]**, and **oPROWPPMP [APP-**282**]** (each secured by requirement in Schedule 2 to the **Draft DCO [APP-016]**) to ensure PROW access and use is maintained as much as possible during construction, and consistently throughout the operational phase of the Scheme.
WC-310	Socio-Economics, Tourism and Recreation	Draft DCO	Draft DCO and Control Document Considerations 18.14. The Applicant should commit to engagement with Wiltshire Council's Economic Development Team to develop a plan to mitigate the impact on local business, focused on tourism, leisure and retail sectors. 18.15. The Applicant should facilitate feedback from local business groups	The Applicant is committed to engagement with the Economic Development Team through the process of agreeing a Statement of Common Ground with Wiltshire Council. The Applicant is happy to use this process to discuss proposed mitigation measures for local businesses.

			such as the Federation of Small Business and the Chambers of Commerce on the impact of the scheme on local businesses. 18.16. The Applicant should also be required to conduct research on any tenanted farms that will lose land to see if these businesses will be able to continue. 18.17. The DCO should contain a Requirement to ensure that fire suppression systems are installed and operational in battery storage facilities.	The Applicant has committed to engagement with external stakeholders through the OSSCEP, which may include local business groups such as the Federation of Small Business, the Chambers of Commerce, and Swindon and Wiltshire Business and Growth Unit, recognising that this is not an exhaustive list. The Applicant has committed to engagement with external stakeholders through the OSSCEP, which may include local business groups such as the Federation of Small Business, the Chambers of Commerce, and Swindon and Wiltshire Business and Growth Unit, recognising that this is not an exhaustive list. The Applicant has therefore committed to engagement with Wiltshire ERT and Swindon and Wiltshire Business and Growth Unit during the production of the final SSCEP, as required by Requirement 18 in Schedule 2 to the **Draft DCO [APP-016]**. Estimates for losses to agricultural employment in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** were based on a reasonable worst-case scenario that the nine affected farm businesses covered by the Solar PV and BESS Sites (Lime Down A-E) would each lose 1.5 full-time equivalent workers, while a further 1.5 times multiplier was used to estimate indirect employment impacts to suppliers or downstream processors. The Applicant is confident that this assumption covers where owner-

				occupier farm businesses are diversifying intentionally and where tenant farm businesses would be required to cease or relocate. A separate report was not published at the discretion of the Applicant at DCO submission to protect farm business owner interests. Regarding the request for a Requirement to be added stipulating that fire suppression systems are installed and operational, the NFCC revised guidance (2026) recognises that BESS designs often do not incorporate an automatic fire suppression system because they are designed to safely burn out to remove the risk of stranded energy in the battery systems. The **Outline BSMP [APP-286]** stipulates that the final BESS design and site layout will have been validated through mandatory Large Scale Fire Testing (LSFT) and rigorous consequence modelling to minimise the requirement for any FRS intervention in a thermal runaway incident. LSFT must establish minimum equipment spacing distances that demonstrate there is no fire propagation to adjacent BESS enclosures or Energy Storage System (ESS) equipment. The **OBSMP [APP-286]** sets out the mitigation measures which will be secured through Requirement 6 ('Battery Safety Management') of the **Draft DCO [APP-016]**.

				As a minimum, a BESS Combustible Concentration Reduction (CCR) system will comply with NFPA 855 (2026) NFPA 69 (Ref 1) guidelines which require activation at no more than 10% of the Lower Explosive Limit (LEL) of the explosive gas(es). The CCR must ensure the prevention of a dangerous build-up of explosive gases (on average 25% LEL within the BESS). An optional BESS water based fixed suppression system (automatic or dry pipe) or Thermal Runaway Propagation Prevention system (engineered to directly access cells within battery modules) may also be utilised following the results of the LSFT test.
WC-311	Soils and Agriculture	Policy Considerations	19.1. The relevant policies for this scheme are: Core Policy 42 – Standalone renewable energy installations Proposals will need to demonstrate how impacts on the following factors have been satisfactorily assessed, including any cumulative effects, and take into account….the best and most versatile agricultural land. Core Policy 51: Landscape Proposals will need to demonstrate that "*visually sensitive skylines, soils, geological and topographical features*" have been conserved and where possible, enhanced through sensitive design, landscape mitigation and enhancement measures. 19.2. Wiltshire Council is of the opinion that these policies have been considered	The Applicant notes this comment and agrees with its contents.

			and whilst some 30% of the site is of land suitable for intensive agriculture, it would be very hard to avoid this in a scheme of this size.	
WC-312	Soils and Agriculture	Environmental Assessment Considerations	19.3. The solar park will take 878 Ha (2,171 acres) of land out of agricultural production. This land is predominantly used for arable uses, with the poorer land used for grass production. Under the UK soil classification system, the site is graded as follows: Grade 2 – 6% Grade 3a – 24% Grade 3b – 44% Grade 4 – 26%	The agricultural land quality across the Site has been assessed and is reported in **ES Volume 3, Appendix 17: Agricultural Land Classification and Soil Survey Report [APP-243]**. The final proportions of agricultural land grades identified within the Site and reported in the ES are: Grade 2 (4%), Subgrade 3a (29%), Subgrade 3b (34%) and Grade 4 (33%). The assessment of effects on agricultural land and soils, including consideration of land quality, is provided in **ES Volume 1, Chapter 17: Soils and Agriculture [APP-069]**. The assessment is based on land quality as defined by Agricultural Land Classification, rather than current land use. As set out in the Agricultural Land Classification guidelines (Welsh Government and Defra, 2025), current agricultural use does not necessarily reflect the underlying quality of the land, and areas of lower grade land may be in arable rotation. The assessment is based on land quality as defined by

				Agricultural Land Classification, rather than current land use. As set out in the Agricultural Land Classification guidelines (Welsh Government and Defra, 2025), current agricultural use does not necessarily reflect the underlying quality of the land, and areas of lower grade land may be in arable rotation.
WC-313	Soils and Agriculture	Environmental Assessment Considerations	19.4. The council seeks further evidence from the Applicant that a full and comprehensive assessment of land, at a lower level than BMV, has been conducted.	An appraisal of alternative sites is presented in **ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP-056]** and **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]**. This assessment considered alternative sites within a 20 km radius of the existing National Grid Melksham Substation and concludes that there are no more suitable locations, including in relation to BMV, within the defined search area than the proposed Site. The Site Selection Assessment explains how brownfield land, industrial land, previously developed land and lower grade agricultural land were considered in accordance with policy.
WC-314	Soils and Agriculture	Environmental Assessment Considerations	19.5. On the assumption that the arable production takes place on land other than Grade 4 that would equate to the loss of approximately 5,000 tons of combinable crops, worth in the region of £750,000 per year. To put this in context, the UK produced 20 million tons of combinable crops in 2024, lower than normal due to the challenging weather conditions experienced in the growing season.	The Applicant has not assessed the quantum of arable crop that is currently produced within the Solar PV Sites (Lime Down A to Lime Down E). However, the potential effects of the Scheme on the agricultural economy have been assessed in economic terms within **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP068]**. That assessment considers the likely loss of Gross Value Added (GVA) to the

				agricultural industry during the operational period of the Scheme and identifies an estimated reduction of approximately £628,000 per annum. This assessment provides an appropriate economic basis for considering the effects of the Scheme on agricultural production at a local and regional scale.
WC-315	Soils and Agriculture	Sheep Grazing	19.6. Due to a lack of information, the council is unable to assess the reduction in output from the grassland. However, the challenges currently facing the agricultural sector are acknowledged, although profitability in the beef and sheep sector has improved. The Applicant is suggesting that the land, once the installation is completed, could be used for grazing. Whilst there are examples of solar parks being used for sheep grazing and / or poultry, it does require extra infrastructure, e.g. fencing suitable for sheep, to protect the equipment and the livestock. The council's officers have not been able to find any reference to this. 19.7. The Applicant states that there may be some grazing opportunities once the solar park is established which may offset the reduction in output from the current grassland, but the council considers this is unlikely. Clarity is therefore required.	Continuation of agricultural use by grazing sheep beneath the solar panels has not been relied upon as a mitigation measure within the assessment of effects on soils, agriculture or agricultural output. Therefore, no specific assessment of grassland output or grazing related mitigation has been undertaken, and grazing has not been assumed to offset any reduction in grassland productivity. The Scheme description is set out in **ES Volume 1, Chapter 3: The Scheme [APP-055]**. This confirms that perimeter fencing will be installed around each Solar PV site, comprising deer mesh and wooden post security fencing to a height of up to 2.5 metres. This fencing would be adequate for containing livestock should grazing occur. However, as grazing is not relied upon within the assessment, no additional livestock specific infrastructure has been proposed or assessed.

WC-316	Soils and Agriculture	Soils Resources Management Plan	19.9. The council are pleased to note in the outline Soil Resources Management Plan (7.15) [APP-280] the clear guidance restricting the work that can be carried out that would have a negative impact on soil structure during periods of wet weather. Whilst the soil handling directives are comprehensive, and there is reference to the remedial work that might be needed following the decommissioning of the site and prior to the land going back to agricultural use, the council would like to see reference to soil boreholes being dug and analysed by the suitably qualified soil scientist rather than just 'site inspections'.	The baseline condition of soils across the Site has been established through borehole and soil pit investigations undertaken by a suitably qualified soil scientist, as reported in **ES Volume 3, Appendix 17-1: Agricultural Land Classification and Soil Resource Survey Report [APP-243]**. This information forms the precondition baseline against which soil reinstatement following decommissioning will be assessed. A detailed Soil Resources Management Plan (SRMP) will be prepared post consent and will be required to be in substantial accordance with the **Outline Soil Resources Management Plan [APP-280].** The detailed SRMP will incorporate the existing borehole and soil pit data as baseline reference information for reinstatement of the land. The **Outline Decommissioning Strategy [APP-279]** confirms that measures to mitigate effects on agricultural land and soils during decommissioning will be set out in the detailed SRMP, which will form a component of the detailed Decommissioning Environmental Management Plan (DEMP). The detailed SRMP will also set out the scope of site inspections, which will include field observations of soil conditions, such as through the use of auger holes and/or soil pits, to inform the identification of any required

				remedial works prior to the land being returned to agricultural use.
WC-317	Soils and Agriculture	Soils Resources Management Plan	19.10. Another area missing from the outline Soil Resources Management Plan (7.15) [APP-280] is any reference to remedial actions that would be taken in the event of a pollution incident, for instance a fuel spill. To date there is no evidence that well maintained solar panels leach chemicals into the ground, unless they are damaged. The council notes that regular inspections will take place.	Measures to prevent and respond to pollution incidents during construction are set out in the **Outline Construction Environmental Management Plan (CEMP) [APP-277]**. This includes construction related mitigation measures to protect soils from contamination, such as procedures for dealing with fuel spills and ground contamination, including the provision of spill kits on site and the implementation of an Emergency Spillage Plan. Further detail on measures to protect soils from contamination will be provided within the detailed CEMP, which will be prepared post consent and will be required to be in substantial accordance with the Outline CEMP.

WC-318	Soils and Agriculture	Draft DCO	19.11. The council considers that plans should be provided to address any pollution incidents that might occur during the construction / decommissioning phases and for any contamination from the solar panels that might be discovered at a future date during the lifetime of this project. 19.12. Unless it is intended that any protective measures needed for the infrastructure on the site in the event of it being used for grazing should be installed by the business using the land for grazing, then a plan should be provided stating what fencing, guards etc will be installed. If the cost is to be borne by the business, then that should be clearly stated. 19.13. Whilst the outline Soil Resources Management Plan (7.15) [APP-280] states that the measures outlined will also be relevant to works during the decommissioning phase, subject to relevant good practices at the time, there is no further reference to what these might be. The council would recommend a comprehensive soil survey with test holes dug to look for signs of soil compaction following decommissioning of the site, with remedial actions like sub-soiling to address any compaction prior to the return to agricultural use.	**Pollution incident management** Measures to prevent and respond to pollution incidents during construction are set out in the **Outline Construction Environmental Management Plan (CEMP) [APP-277]**. This includes strategies for dealing with fuel spills and ground contamination, such as the provision of spill kits on site and the implementation of an Emergency Spillage Plan. Further detail on measures to protect soils from contamination will be provided within the detailed CEMP, which will be prepared post consent and required to be in substantial accordance with the Outline CEMP. **Grazing and protective infrastructure** Continuation of agricultural use through grazing has not been relied upon as mitigation within the assessment. The Scheme description in **ES Volume 1, Chapter 3: The Scheme [APP-055]** confirms that perimeter fencing will be installed around each Solar PV site, comprising deer mesh and wooden post security fencing to a height of up to 2.5 metres, which would be adequate for containing livestock should grazing occur. As grazing is not assumed within the assessment, no further grazing specific infrastructure or allocation of responsibility has been proposed or assessed. **Soils and decommissioning** The **Outline Soil Resources Management Plan (SRMP) [APP-280]** confirms that soil protection measures

				will also be relevant during decommissioning, subject to good practice at the time. A detailed SRMP will be prepared post consent and will include prescriptions for restoration methods, amelioration measures and monitoring. The detailed SRMP will also include further detail on site inspections to be undertaken at decommissioning for the purposes of reinstating land to agricultural use, such as borehole and/or soil pit observations.

WC-319	Human Health	Policy Considerations	20. Public Health Considerations 20.1 The council considers that relevant planning policy has been adequately considered as part of the application, specifically that stated in the following documents: • ES Vol 1, 6.1 Chapter 18: Human Health [APP-070] • ES Vol 3, 6.3 Appendix 18-1: Matters relevant to human health raised through consultation [APP-244] • ES Vol 3, 6.3 Appendix 18-2: Human health: Legislation, policy, guidance and supporting information [APP-245] • ES Vol 3, 6.3 Appendix 18-3: Human health: Summary of non-significant effects [APP-246] • ES Vol 2, Figure 18-1: Study areas for human health [APP-174] • ES Vol 2, Figure 18-2: Health and social care facilities [APP-175] • ES Vol 2, Figure 18-3: Hospitals and emergency health care facilities [APP-176]	The Applicant notes this comment.

WC-320	Human Health	Environmental Assessment Considerations	20.2 Due to the scale, complexity and duration of the construction phase, the scheme will have an adverse impact on the amenity, wellbeing and mental health of Wiltshire's residents during the construction, operation and decommissioning phases of the proposed solar farm development. 20.3 The assessment methodology is supported with no additional comments noted. However, given the scale of the proposals, best practice in regard to community engagement and wellbeing should be implemented throughout the course of the project (see below). 20.4 It should also be noted that Wiltshire's Joint Strategic Needs Assessment has been updated and should be referenced in any future submissions: JSNA 2025 Wiltshire Intelligence. 20.5 Furthermore, the English indices of deprivation have been updated and should be referenced in any future submissions: English indices of deprivation 2025 - GOV.UK.	The Applicant has assessed the likely significant effects to human health and wellbeing in **ES Volume 1, Chapter 18: Human Health [APP-070]**, and finds that subject to implementation of mitigation measures, no significant adverse effects to human health are anticipated at any phase of the Scheme. Moreover, the assessment methodology has been consulted upon during pre-submission stages with Wiltshire Council's Public Health Team. The Applicant has sought to engage with communities ahead of construction through the implementation of a Community Liaison Group, as secured through Requirement 4 in Schedule 2 to the **Draft DCO [APP-016]**. Whilst this group is set up for the construction phase of the Scheme, the Applicant has also committed to providing a designated community contact during the operational lifetime of the Scheme and a dedicated Community Liaison Manager committed to during peak replacement events and decommissioning. This is secured through the **Outline OEMP [APP-279]** and **Outline DS [APP-279]** by Requirements 14 and 20 in Schedule 2 to the **Draft DCO [APP-016]**. The Applicant welcomes the comments supporting the methodology used within the chapter. The Applicant notes that Wiltshire Council's JSNA, and the English

				Indices of Deprivation have been updated since DCO submission and commits to ensuring these will be referenced in any relevant future submission.

WC-321	Human Health	Draft DCO	20.6 Schedule 2, Requirement 4 of the draft DCO (3.1) [APP-016] gives requirement for a Community Liaison group: *4.* *(1) Prior to the commencement of the authorised development the undertaker must submit to the relevant planning authority for approval the terms of reference for a community liaison group whose aim is to facilitate liaison between representatives of people living in the vicinity of the Order limits and other relevant organisations in relation to the construction of the authorised development.* *(2) The community liaison group must be established prior to commencement of the authorised development and must be administered by the undertaker and operated in accordance with the approved terms of reference.* *(3) The community liaison group is to continue to meet until the first anniversary of the date of final commissioning of the authorised development unless otherwise agreed with the relevant planning authority.* 20.7 Whilst the formation of a Community Liaison Group will be beneficial, in order to make a meaningful difference to the affected communities, instead of a Terms of Reference, a detailed communication strategy document should be submitted and approved to the LPA prior to consent being granted. This strategy	The Applicant considers that the wording of Requirement 4 in Schedule 2 to the **Draft DCO [APP-016]**, and the wording of the **Outline CEMP [APP-278]** to provide a Stakeholder Communications Plan (as secured through Requirements 13), together cover the level of detail being requested by Wiltshire Council. It should be noted that Wiltshire Council will be the designated discharging authority for both these requirements, and as such will be able to determine if sufficient detail has been included across these two requirements for them to be approved. The Applicant is happy to commit to drafting the Community Liaison Group Terms of Reference in reference to Suffolk County Council's Energy and Climate Adaptive Infrastructure Policy guidance on Community Engagement and Wellbeing. The production of a Communication Strategy would thereafter be the responsibility of the Community Liaison Group to draft following its establishment, and ahead of any construction works on the Scheme commencing.

			should outline in practical terms the Community Liaison Group Terms of Reference as well as Key Performance Indicators for community engagement and the safeguarding of community wellbeing. The Suffolk County Council's Energy and Climate Adaptive Infrastructure Policy guidance on Community Engagement and Wellbeing v1.0 09/2024 demonstrates the mitigations and measures that should be used in this document.	
WC-322	Human Health	Draft DCO	20.8 Furthermore, a community liaison manager is mentioned in the outline CEMP (7.12) [APP-277], as is a Stakeholder Communications Plan, but more detail is needed on implementation. An overarching document such as a Community Liaison Strategy (see above) to describe how these mitigations will interact with respect of the LDSP area would clarify the overall approach to community communications and engagement for the site and all the communities affected. For example, the mitigations given in the outline CEMP include use of a display board and reference to a site manager do not seem practical for the LDSP project as	The Applicant is required to submit a detailed CEMP substantially in accordance with the **Outline CEMP [APP-278]** as part of the discharge of Requirement 13 in Schedule 2 to the **Draft DCO [APP-016]**. The Applicant will at that point provide Wiltshire Council with details of the implementation of role of Community Liaison Manager, and of a Stakeholder Communication Plan, which is to be then approved by Wiltshire Council as the designated discharging authority. Display boards would be installed near to the entrances to construction compounds. Contact details for Site Manager(s), the Community Liaison Manager, and any other relevant

			a whole, given the large area and number of communities affected.	contact point for information, nuisance or complaints, will also be distributed to Wiltshire Council, local parish councils and to Affected Persons.
WC-323	Other Environmental Matters	Minerals and Waste	21. Minerals and Waste Considerations Policy Considerations 21.1. Full details of the legislation, planning policy and other guidance documents relating to Minerals has been captured in 6.3 Environmental Statement Volume 3, Appendix 20-1 Minerals Legislation, Policy and Guidance [APP-258]. 21.2. Likewise, full details of the legislation, planning policy and other guidance documents relating to Materials and Waste has been captured in 6.3 Environmental Statement Volume 3, Appendix 20-2 Materials and Waste Legislation, Planning Policy and Guidance [APP-259]. 21.3. Summaries of the legislation, planning policy and other guidance documents of relevance to the assessment of Minerals and of Materials and Waste are provided in 6.1 Environmental Statement Volume 1, Chapter 20 Other Environmental	The Applicant notes this comment.

			Matters [APP-072]. 21.4. The council considers the relevant planning policies relating to mineral resources and to materials and waste have been adequately considered and the conclusions drawn are not disputed.	
WC-324	Other Environmental Matters	Minerals and Waste	Environmental Assessment Considerations 21.5. The assessment methodology set out in 6.1 Environmental Statement Volume 1, Chapter 20 Other Environmental Matters [APP-072], supported by 6.3 Environmental Statement Volume 3, Appendix 19-11 Mining Risk Assessment [APP-257], for considering how the project is predicted to affect identified mineral resources is appropriate. The conclusion that following the implementation of embedded mitigation there would be no significant residual effects and no in-combination effects alongside minerals is not disputed. 21.6. The assessment methodology set out in 6.1 Environmental Statement Volume 1, Chapter 20 Other Environmental Matters [APP-072], supported by 6.3 Environmental Statement Volume 3, Appendix 20-3 Materials and Waste	The Applicant notes this comment.

			Methodology and Baseline [APP-260], for considering the likely effects of the project in materials and waste is appropriate. The conclusion that no residual significant effects are identified for materials and waste and no in-combination effects because of the project is not disputed.	
WC-325	Other Environmental Matters	Minerals and Waste	Draft DCO and Control Document Considerations 21.7. It is considered that relevant mitigation and monitoring requirements are secured via Schedule 2 of the Draft DCO (3.1 Draft Development Consent Order) [APP-016]. 21.8. Furthermore, the mitigation and monitoring measures set out in the following documents are satisfactory and no changes or additional measures in respect of minerals and materials and waste are considered necessary. • 7.12 Outline Construction Environmental Management Plan [APP-277] • 7.13 Outline Operational Environmental Management Plan [APP-278] • 7.14 Outline Decommissioning Strategy [APP-279] • 7.16 Outline Site Waste Management Plan [APP-281] • 7.26 Commitments Register [APP-291]	The Applicant notes this comment.

WC-326	Description and DCO Process	Draft DCO	22. Other Matters 22.1. Wiltshire Council had the opportunity to comment on the Draft DCO prior to DCO application submission. Whilst Island Green Power have responded to the points raised in the council's response, limited amendments have been made to the submitted 3.1 Draft DCO [APP-016]. Therefore, the majority of the council's previously identified concerns remain. 22.2. This correspondence has been included within Appendix B of this response. 22.3. The council will require the identified issues with the Draft DCO to be adequately addressed during the course of the Examination.	The Applicant has considered Wiltshire Councils comments and has amended the **draft Development Consent Order [APP-016]** where practicable. The Applicant welcomes ongoing engagement with Wiltshire Council.
WC-327	Community Benefits	Community Benefit Fund	22.4. Further information and guarantees are also required with regards to the Applicant's proposed Community Benefit Fund. This includes information on the overall value of the Fund, how it will be administered and the criteria for projects which could be funded. Wiltshire Council is resolute in its view that given the significant scale of this development, sufficient benefit must be secured for the affected local community should the Secretary of State grant consent for this scheme.	As mentioned in response to Wiltshire Council's representation 15.2, the Applicant is exploring bespoke mechanisms through which requests, such as the provision of funds for specific purposes, could be implemented. They consider the specific request for an annual sum from the local authority to be a suitable use of the Community Benefit Fund. The Applicant is committed to ensuring that the fund would have independent, professional administration and oversight to manage its lifecycle, supported by dedicated local needs analysis to identify project criteria that align with community priorities, such as environmental sustainability, education, or social infrastructure. It is proposed that establishing an independent

				decision making panel involving local representatives to ensure that funding is allocated fairly and remains community-driven from application to distribution. This approach is reflected in ongoing engagement and representations with local authorities.

WC-328	Description and DCO Process	Conclusion	23. Conclusion 23.1. Wiltshire Council hopes that the information contained above is helpful to the Examining Authority when undertaking their initial assessment of the principal issues to be considered at examination. 23.2. Further detailed information will be provided within the council's Written Representation, Local Impact Report and Statement of Common Ground following the detailed review of the application and follow-up documentation. 23.3. It is also important to note that Wiltshire Council's administration is opposed to this proposed development due to its significant scale and adverse environmental impacts, which would result in the industrialisation of the countryside. Therefore, as a result of the issues identified, Wiltshire Council does not support the proposal as it stands and considers that development consent should not be granted for the Scheme as submitted.	The Applicant notes this comment and thanks Wiltshire Council for their response. In terms of the comment that the Scheme would result in the industrialisation of the countryside, the visual impact of the Scheme is fully assessed in the **Landscape and Visual Impact Assessment (LVIA) presented in ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**. 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 **Landscape and Ecology Mitigation Plan (ES Volume 2, Figure 3-4-1 to 3-4-5.2) [APP-084]**. The **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]** provides details of the proposed mitigation and enhancement which are described in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**, the **Landscape and Ecology Mitigation Plan [APP-084]**, the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]**, and the **Outline Ecological Protection and Mitigation Strategy (OEPMS) [APP-284]**.
WC-329	Transport and Access	Document Review	Appendix A - Highways and Transport Document Review - Detailed Comments Highways and Transport Document Review Detailed Comments	The Applicant notes this comment.

			1. This Appendix includes Highways Development Management comments in relation to the identified Application documents. 2. The overarching themes have been summarised within the main body of the report.	
WC-330	Transport and Access	Document Review	2.2 Land Plans [APP-006] 3. The 23 number land plans indicate areas in blue and yellow shading which encroach over the existing public highway limits in several locations, notably Farhill Lane, Fosse Way, Alderton Road, the A429, A420 Bristol Road and the A4 Bath Road. In the case of the 'blue' land identified the KEY cites that "*New rights (including restrictions) to be compulsorily acquired and temporary use of land and in relation which it is proposed to suspend or extinguish easements, servitudes and other private rights*". In the case of the 'yellow' land identified it is stated "*Temporary use of land and in relation to which it is proposed to temporarily suspend easements, servitudes and other private rights*". It is assumed in both cases that, where this is also public highway, that normal rites of passage will not be affected by these designations on the Land Plans. Furthermore, where it is stated that new rights are to be compulsory purchased, it is unclear what rights will be sought and how this will impact public highway land within the areas of blue shade. This needs clarification.	The Applicant confirms that details of the permanent and temporary rights to be acquired are set out in the **Book of Reference [APP-020]**, specifically in Sections 4 and 5 on pages 9, 10, and 11. The rights that may be acquired in the 'blue' plots are as set out in Schedule 9 of the **draft DCO [APP-016]**, being the permanent easement for cables laid underground as part of the authorised development. Temporary possession powers are included over areas of public highway, in areas where cable rights are not required, to ensure that there is no conflict between the proposed works and privately owned land interests, primarily in the subsoil of the highway.

WC-331	Transport and Access	Document Review	2.3 Works Plans [APP-007] 4. The 23 number works plans identify works proposed within public highway as 'Works Numbers 8A or 8B'. It is therefore inferred that where lengths of public highway identified in past comments on the Transport Assessment Scoping Note are excluded from these designations on the works plans, that no mitigation or improvements are deemed necessary to accommodate the increased HGV trafficking expected during construction. In previous comments submitted to the Applicant, the council's Highways Development Management officer identified the following minor roads as requiring 'before and after' surveys and assessment set out in the supporting Transport Assessment to demonstrate adequate carriageway width or frequency of passing place opportunity on all these minor roads to pass at least an HGV and a light vehicle or ideally allow the passage of two large vehicles. • Lime Down Site A-C: Unnamed road between Fosse Way and Sherston: Circa 1.1km from the Fosse Way junction. • Lime Down Site D: Unnamed road between the roundabout junction with Wellington Place Road and Bradfield Cottages - circa 1.7km • Lime Down Site D: Unnamed road between the Bradfield Cottages / The Street junction and the proposed secondary access point to Lime Down Site D - circa 460m • Lime Down Site E: Rodbourne Road • Lime Down Site E: The unnamed	With regard to comments relating to passing opportunities on the following links, please refer to the Applicant's responses to Paragraph 14.7, 14.8 and 14.9. • Lime Down Site A-C: Unnamed road between Fosse Way and Sherston: Circa 1.1km from the Fosse Way junction. • Lime Down Site D: Unnamed road between the roundabout junction with Wellington Place Road and Bradfield Cottages - circa 1.7km. As construction traffic is proposed to access the eastern part of Lime Down D via Access 10 and Lime Down E via Access 18, an assessment of the following minor roads was not included in **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]**. • Lime Down Site D: Unnamed road between the Bradfield Cottages / The Street junction and the proposed secondary access point to Lime Down Site D - circa 460m. • Lime Down Site E: Rodbourne Road. • Lime Down Site E: The unnamed adoptable highways which are proposed for construction access to the south of Rodbourne Road.

			adoptable highways which are proposed for construction access to the south of Rodbourne Road. 5. In reviewing the submitted works plans it is noted that: • Sheet 1: Most of the length of Farhill Lane between the Fosse Way junction and Lime Down Site A is excluded from any perceived need for improvement works. • Sheet 5: The entirety of the main construction route from the A429 to Bradfield Cottages is excluded from the identified works areas, so again inferring that nothing is needed to make this minor route suitable for significantly increased HGV trafficking to Lime Down Site D. • Rodbourne Road is excluded, but it is now understood that construction access to Lime Down Site E will not be via Grange Lane / Rodbourne Road. 6. Unless it is conclusively proven by assessments included in the Transport Assessment that no passing bay or widening improvements are needed, it is in the council's Highways Development Management officer's view not possible to infer that the length of Farhill Lane identified and the route from the A429 to Bradfield Cottages should not be included within the Work Number 8A or 8B designations.	

WC-332	Transport and Access	Document Review	2.4 Streets Plans [APP-008] 7. It is noted that the lengths indicated in purple with reference points linked to Schedules 4, 5, 6 and 8 of the Draft DCO [APP-016] correlate with the Works Number 8A or 8B areas mentioned above. As such, there would appear to be no provision within the DCO to undertake any wider improvement works along Farhill Lane or along the route between the A429 and Bradfield Cottages should this be necessary to enable safe and satisfactory passage for two HGVs.	For further explanation regarding the passage of two HGV vehicles on the routes specified in this comment, refer to the Applicant's responses to Paragraph 14.7, and 14.8

WC-333	Transport and Access	Document Review	2.6 Access Plans [APP-010]; ES Vol 2, 6.2 Figure 13-11 Construction Access Locations: Solar PV Site [APP-156]; ES Vol 2, 6.2 Figure 13-12 Construction Access Locations: Cable Route Corridor [APP-157]; and APP-158: 6.2 ES Vol 2, 6.2 Figure 13-13 Operational Only Access Locations: Solar PV Sites [APP-158] 8. It is noted that these collective plans now show: • An additional 10 number access locations to Lime Down Sites A-E (Ref: 201-210) with these identified as 'Operational Only' access locations. Whilst likely to be lightly trafficked, it is again important to understand what highway works are needed to construct these new accesses and the visibility splay distances available to emerging vehicles. • An additional 27 number vehicular access locations to the cable route corridor. Schedule 7 Part 2 to the Draft DCO [APP-016] identifies locations 101-125 inclusive as being a temporary means of access only, with only locations 126-127 off Westlands Lane at Melksham being permanent. It appears that both are existing junctions serving minor tracks, but it is unclear whether any highway works are intended to upgrade them.	The **Access Plans [APP-010]** shows nine 'Operational Only' access locations, not ten. The nine 'Operational Only' access locations serving Lime Down A to E are existing field access points. These will remain in place and unchanged as part of the Scheme and accommodate occasional trips to the proposed habitat areas. These access points are referenced in Paragraph 1.4.17 of **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]**. The proposed highway works for access locations 126 and 127 are shown in Drawing PL126 and Drawing PL127 provided in Annex D of **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]**. The drawings show proposed works required to upgrade the proposed bell mouths at each junction.

WC-334	Transport and Access	Document Review	9. Access points for construction works at the Lime Down Sites (A-E) are largely the same as those presented in the Transport Assessment Scoping Note. The only key difference is the proposed construction route into Lime Down Site E, which is via a new access Location 18 on the A429 south of Corston. An additional access in the same location (Location 10) serves the cable route area between the A429 and Lime Down D. This is supported, especially the former reliance on Grange Lane and Rodbourne Road, which is now removed.	The Applicant notes this comment
WC-335	Transport and Access	Document Review	3.1 Draft Development Consent Order [APP-016] and 3.2 Explanatory Memorandum [APP-017] Articles 10 and 15 10. In previous comments on the draft DCO, the council has expressed concern over the ability of the Council to control works being undertaken within the public highway, and from the Highways Development Management perspective, the ability to ensure the proposed site access and other works meet the adoptable standard. In the Applicant's response to Council comments on the draft DCO, it is stated in response to the need for s278 Agreement and due process in respect of Article 10 that: "*A separate agreement will not be necessary as the undertaker's powers relating to the alteration of streets are conveyed by Article 10 of the DCO as opposed to the Highways Act 1980 ("HA 1980"). Any agreement with the street authority*	Please refer to the Applicant's response to paragraphs 14.3 and 14.4, above. The Applicant considers the word reasonable is appropriate, and notes that it has precedent in the Mallard Pass Solar Farm Order 2024 (article 9), the West Burton Solar Project Order 2025 (article 9), and the Fenwick Solar Farm Order 2026 (article 10).

			would therefore be pursuant to Article 15 of the DCO and not section 278 of the HA 1980. It should be noted however that Article 15 and section 278 address the same aspects of design approval, bond and sign off". However, review of DCO Article 15 states in (1) that "*A street authority and the undertaker may enter into agreements*". The concern is the use of the word 'may' (high-lighted in bold), which suggests that the undertaker is not bound or required to do so, including the design approval of the construction drawings by the Council. Whilst the Applicant's response suggests that "*Article 15 and section 278 address the same aspects of design approval, bond and sign off*", the council cannot see this expressly stipulated as to what an Agreement under Article 15 'shall' include or encompass. 11. However, it is noted under Article 10(4) that "*The powers conferred by paragraph (2) may not be exercised without the consent of the street authority, such consent to be in a form reasonably required by the street authority*". It is the council's Highway Development Management officer's view that the form of consent would include the council's requirement for an agreement under Article 15, with clauses within this like those used in the council's standard s278 agreement template. Whilst it is not considered that this could be construed as unreasonable, the council would like to	

			see the word ‘reasonable’ from Article 10(4) removed.	

WC-336	Transport and Access	Document Review	Article 14 12. The council's Highways Development Management officer remains concerned about the precise wording of Article 14, as it implies that approval by the highway authority is only required for new access locations proposed beyond those set out in Schedule 7, Parts 1 and 2. In short, all the accesses in Schedule 7, whether permanent or temporary, are seemingly deemed approved in at least principle under powers conferred in Article 14. This is further confirmed by the Applicant's response to the request for an amendment to require technical approval by the Council for all access points where is stated: "*Technical approval by the Council is not required as the permanent and temporary means of access set out in Part 1 and Part 2 of Schedule 7 respectively are approved by Article 14. Access works however would be secured through the discharge of the Construction Traffic Management Plan ("CTMP") via Requirement 15 which requires approval from the Council prior to the commencement of the Scheme. The technical process for implementing works can also be subject to an agreement under Article 15*". 13. Looking at Requirement 15 in Schedule 2, this relates solely to the CTMP, so not necessarily the access details and design which will, in many cases, be permanent highway works. This to council officer's mind needs to be secured, so the technical review / approval of construction details,	Please refer to the Applicant's responses to paragraphs 14.5 and 14.3 above. As noted above, the works to alter the layout of the street, including to construct and modify accesses, is carried out under article 10. Temporary alterations must be restored to the reasonable satisfaction of the street authority. Where alterations are permanent, article 11 applies, requiring the work to be completed to the reasonable satisfaction of the street authority and maintained by the Applicant for a period of 12 months. The technical approval of works to the highway is therefore secured by articles 10 and 11, with further provision for this made within the **outline CTMP [APP-287].**

			through one or more agreements under Article 15. However, as noted already, there is no requirement for the undertaker to enter into any agreement, so 'may' as opposed to 'will'. As such, it remains a concern as to how the council can ensure that construction works to improve or create new permanent access points listed in Schedule 7 are of an adoptable standard at both the design and implementation stages.	
WC-337	Transport and Access	Document Review	ES Vol 1, 6.1 Chapter 2 The Order Limits [APP-054]; ES Vol 2, 6.2 Figure 2-1 Elements of the Site [APP-077]; ES Vol 2, 6.2 Figure 2-2-1 to 2-2-5 Field Boundaries and Numbering [APP-078];	For an explanation as to why identified lengths of highway serving as the construction access routes to Lime Down Sites A and D are not included in the Highway Improvement Areas, please refer to the Applicant's

			ES Vol 2, 6.2 Figure 2-3-1 to 2-3-9 Environmental and Planning Constraints [APP-079]; and ES Vol 2, 6.2 Figure 2-4-1 to 2-4-9 Public Rights of Way and Highways [APP-080] 14. With regard to the Highway Improvement Areas indicated in pink on these figures and notably on Figures 2-4-1 to 2-4-9 showing the Highways and existing PROW, the concern, as noted in commenting on the Works plans, is the exclusion of certain critical lengths of highway serving as the construction access routes to Lime Down Sites A and D.	responses to Paragraph 14.7, 14.8 and 14.9.
WC-338	Transport and Access	Document Review	ES Vol 1, 6.1 Chapter 3 The Scheme [APP-055]; ES Vol 2, 6.2 Figure 3-1 to 3-1-5 Indicative Site Layout Plan [APP-081]; ES Vol 2, 6.2 Figure 3-2 to 3-1-10 Key Construction Phase Features [APP-082]; ES Vol 2, 6.2 Figure 3-3 400 kV Substation and BESS Layout [APP-083]; ES Vol 2, 6.2 Figure 3-4-1 to 3-4-5.2 Landscape and Ecology Mitigation Plan [APP-084]; ES Vol 3, 6.3 Appendix 3-1 Substations and Battery Energy Storage System Description [APP-182]; ES Vol 3, 6.3 Appendix 3-2 Cable Route Construction Method Statement [APP-183]; and ES Vol 3, 6.3 Appendix 3-3 Illustrative Drawings [APP-184] 15. Paragraphs 3.3.7.2 and 3.3.7.3	For an explanation as to why identified lengths of highway serving as the construction access routes to Lime Down Sites A and D are not included in the Highway Improvement Areas, please refer to the Applicant's responses to Paragraph 14.7, 14.8 and 14.9.

			under 'Highway Improvements Areas' state that: "*Highway improvements will be made to facilitate construction. The Highway Improvement Areas are shown in ES Volume 2, Figure 3-2: Key Construction Phase Features [EN010168/APP/6.2])*" and "*Works within the Highway Improvement Areas comprise modifications to the existing highway such as improvements to road edge where it is deteriorated, minor works to enable construction vehicle movements such as provision of passing places within the existing highway boundary, traffic management measures and provision of visibility splays*". However, as previously noted, these HIA subsumed within Works Numbers 8A or 8B appear to exclude any deemed need for improvements along key minor road lengths providing primary access to Lime Down Sites A and D. Refer to comments under 'Works Plans'.	
WC-339	Transport and Access	Document Review	ES Vol 1, 6.1 Chapter 4 Alternatives and Design [APP-056]; ES Vol 2, 6.2 Figure 4-1 to 4-1-8 Development Site at Scoping and at PEIR [APP-085]; ES Vol 2, 6.2 Figure 4-2 to 4-2-8 Development Site at PEIR and DCO Application submission [APP-086]; ES Vol 2, 6.2 Figure 4-3 Main infrastructure layout changes between Scoping and PEIR [APP-087]; ES Vol 2, 6.2 Figure 4-4 Main infrastructure layout changes between PEIR and DCO Application submission [APP-088]; and ES Vol 2, 6.2 Figure 4-5 Indicative	For an explanation as to why identified lengths of highway serving as the construction access routes to Lime Down Sites A and D are not included in the Highway Improvement Areas, please refer to the Applicant's responses to Paragraph 14.8.

			Cable Route Corridors [APP-089] 16. Plate 4-3 shows the various construction routes considered for access to Lime Down Sites A-C. It is agreed that the route to / from the M4 via the A46, B4040, B4039 and Fosse Way is the best of the alternatives considered. However, Highway Improvement Areas (Plate 4.4) are only identified in four locations, with the most meaningful at Alderton Road near Grittleton some distance to the south of the Lime Down areas. There is a concern that the unnamed road between the Fosse Way and Sherston serving Lime Down Site A is excluded from any consideration as to need for improvements to facilitate two-way HGV trafficking.	
WC-340	Transport and Access	Document Review	17. Section 4.5 'Alternative Construction Routes for Solar PV Sites' appears to suggest that no other option than the A429 was ever considered for access to Lime Down Sites D-E. However, it is known from the content of the Scoping Note submitted for the Transport Assessment / OCTMP, that the use of Grange Lane and Rodbourne Road was originally proposed as part of the main access route into Lime Down Site E. However, as previously noted, the revised proposal for Lime Down E taking direct access off the A429 via a new access south of Corston is supported, as the minor roads mentioned are considered unsuitable for regular trafficking by articulated HGVs.	The Applicant notes this comment.

WC-341	Transport and Access	Document Review	18. Figures 4.1., 4.2 and expressly Figure 4.5 show how the extent of the cable search area has been progressively reduced between the initial Scoping and DCO Application stages to Route 1 (Yellow). Specific comment on this or the 25 number temporary access points required at the various major and minor road crossovers during the construction phase is not offered. The formation / construction of these temporary accesses and any Temporary Traffic Management arrangements as may be required to control traffic on roads affected are matters for the council's Network Management team and, unless otherwise dictated by provisions in the DCO, would be expected to follow the normal processes for securing street works Permits or Licenses to secure road space and work within the public highway.	The Applicant notes this comment.
WC-342	Transport and Access	Document Review	ES Vol 1, 6.1 Chapter 6 Environmental Impact Assessment Methodology [APP-058] 19. Tables 6-2 and 6.3 showing Sensitivity and Magnitude criteria bandings and how are used in Table 6-5 to assess 'Degrees of Significance' in terms of various LDSF impacts are noted.	The Applicant notes this comment.

WC-343	Transport and Access	Document Review	ES Vol 1, 6.1 Chapter 13 Transport and Access [APP-065]; ES Vol 2, 6.2 Figure 13-1 Study Area: Solar PV Sites [APP-146]; ES Vol 2, 6.2 Figure 13-2 Study Area: Cable Route Corridor [APP-147]; ES Vol 2, 6.2 Figure 13-5 Abnormal Load Routes - Solar PV Sites [APP-150]; ES Vol 2, 6.2 Figure 13-6 Abnormal Load Routes - Cable Route Corridor [APP-151]; ES Vol 2, 6.2 Figure 13-7 Sensitivity of Links: Solar PV Sites [APP-152]; ES Vol 2, 6.2 Figure 13-8 Sensitivity of Links: Cable Route Corridor [APP-153]; ES Vol 2, 6.2 Figure 13-9 Traffic Survey Locations: Solar PV Site [APP-154]; ES Vol 2, 6.2 Figure 13-10 Traffic Survey Locations: Cable Route Corridor [APP-155]; and ES Vol 3, 6.3 Appendix 13-1 Transport Assessment [APP-233] ES Chapter 13 Transport and Access [APP-065] 20. Table 13-4 to Chapter 13 of the Environmental Statement sets out the assessed 'Sensitivity' classification of roads which form the construction routes to Lime Down Sites A-C and D-E, these based as stated on the ISEP Guidelines. It is accepted that the entirety of the route through the CNL from the A46 to and including Alderton Road to the north-west of Grittleton is of 'Medium' sensitivity. However, the route into Lime Down Site D from the A429 to Bradfield Cottages does not seem to be broken down into sufficient separate	The Applicant notes the agreement of the 'Sensitivity' classification of the specified roads on the construction routes. The section of the construction route between Hullavington Crossroads and Bradfield Cottages does not include any additional receptors to those on the section between the A429 and Hullavington Crossroads as per the Sensitivity Definitions provided in Table 13-3 of **ES Volume 1, Chapter 13-1: Transport and Access [APP-065]**. This section of road has therefore been classified as 'Low' sensitivity. The potential impact on 'Road User and Pedestrian Safety' has been assessed in **ES Volume 1, Chapter 13-1: Transport and Access [APP-065]** in accordance with the ISEP Guidelines. In relation to comments on passing opportunities please Refer to the Applicant's responses to Paragraph 14.7, 14.8 and 14.9.

			links in assessing receptor sensitivity. For example, whilst the part of the route between the A429 and the crossroads junction to the north-east of Hullavington might be agreed as 'Low' sensitivity, the onward route past Bradfield Cottages to Lime Down Site D access points 8, 9 and 20 is clearly more sensitive and likely to see a significant increase in HGV movements. It is reiterated that sensitivity in this context does not consider highway safety and operational impact, and so the need to demonstrate that there is ample passing opportunity for two HGVs along all parts of this key access route.	
WC-344	Transport and Access	Document Review	21. It is noted that 'Impacts' considered and how these are assessed / graded under criteria set out in Table 13-6 to the Environmental Statement exclude 'Highway Safety' per-se. However, minor roads subject to increases in HGV trafficking, and where two-way passage for two HGVs is limited to only specific passing places, is going to lead to increased safety risk if such opportunities for passage are infrequent with large distances and no inter-visibility between them. This isn't possible to assess under the 'Driver Delay' impact heading based on the absolute increase in vehicle flows. In short, the potential risk of lengthy reversing man oeuvres being needed by HGVs or other vehicles to enable	The potential impact on 'Road User and Pedestrian safety' has been assessed in **ES Volume 1, Chapter 13.1: Transport and Access [APP-065]** in accordance with the ISEP Guidelines. In relation to comments on passing opportunities please Refer to the Applicant's responses to Paragraph 14.7, 14.8 and 14.9.

			passage along the minor roads forming the construction routes must be avoided, and highway works undertaken to mitigate.	
WC-345	Transport and Access	Document Review	22. Table 13-20 to the Environmental Statement shows the predicted number of HGV movements associated with the construction of Lime Down Sites A-E. This appears to be unchanged from the figures in the Scoping Note previous issued for the TA / oCTMP. The council's Highways Development Management officer comments on these when reviewing the Transport Assessment below and particularly the supporting information requested in the past regarding their derivation. However, Tables 13-24 and 13-25 show overall and HGV increases on the various roads in the assessment area for the baseline year of 2028. With regards to overall changes in predicted flows and the ISEP 'Rule 1' Guideline, these are assessed as an insignificant effect with only the road west of Grittleton and Alderton Road getting close to a 30% daily change. However,	In relation to comments on passing opportunities for two HGVs please refer to the Applicant's responses to Paragraph 14.7, 14.8 and 14.9.

			HGV (%) changes are >30% in eight locations, with significant change in the absolute number of HGV movements along the route between the A429 and Bradfield Cottages where no need for any improvement works is defined in the DCO and supporting plans. Paragraph 13.7.32 states in respect of this route that "*The initial section of the road has recently been upgraded with central markings and street lighting. Beyond the access to Hullavington Airfield, the route becomes more rural in character with no central road markings or street lighting. The unnamed road routes beneath a railway underbridge before becoming Bradfield Cottages. There are no posted weight or height restrictions along the section of road within the Study Area*". This implies the width in many cases may be substandard and the lengths where two HGVs can potentially pass limited in extent. Paragraph 13.10.77 states in part that "*It should be noted that high percentage changes in HGVs typically reflect a low baseline number of HGVs. Real term numbers of HGVs are relatively low*" and "*Where baseline flows are low, any change in traffic flow will result in a large percentage change, but this will not necessarily lead to a likely significant effect*". The council would argue that HGV movement changes of 76 per day along this specific route will increase the risk of two opposing HGVs meeting on this route and so it will be a significant effect and indeed a highway safety issue if there is not sufficient carriageway width	

			and / or passing place opportunity for accommodating two-way passage of 16.5m articulated HGVs along this route.	
WC-346	Transport and Access	Document Review	23. Further examination of Tables 13-34 and 13-35 in the Environmental Statement shows the projected increases in overall flows and HGV volumes along the cable route corridor, more particularly where existing roads cross-over and temporary access points are proposed. It is noted overall increases on certain minor roads are quite significant, with Sevington Lane a potential concern as this has a very narrow width with limited passing places. Changes in HGV flows of >30%, albeit small in absolute terms in many cases, do affect a much greater proportion of minor roads where the cable route crosses. Paragraph 13.10.67 states in respect of the cable corridor that: "*HGV trips will largely consist of 10m tipper trucks, including those required to construct the haul road and laydown areas. There will be approximately 132 AIL movements associated with cable drum deliveries over the length of the Grid Connection Cables*". Subject to confirmation in the Transport Assessment, it will need to be demonstrated that passage for 10m tipper trucks can be accommodated along the minor roads intended for access. Furthermore, which of these minor roads are intended for AIL	The change in HGV flows will be small in absolute terms at each Cable Route Corridor Access Point (4 HGVs per day, equivalent to one movement per hour for 90 days during construction times). Each access has been tracked to demonstrate access for a 10m tipper truck, these are shown in Drawings SK101 to SK128, contained in Annex D of **ES Volume 3, Chapter 13-1: Transport Assessment [APP-233]**. The Cable Route Corridor Access Routes for AIL vehicles are shown in **ES Volume 2, Figure 13-6: Abnormal Indivisible Load Routes: Cable Route Corridor [APP-151]**. The swept-path of AIL movements along these routes has been undertaken at key points as presented in Appendix D of the **Outline Construction Traffic Management Plan (CTMP) [APP-287]**. This demonstrates that the AIL movements for can be accommodated.

			access, as width and / or alignment may preclude this.	
WC-347	Transport and Access	Document Review	24. In paragraph 13.11.1 it is stated in part that to minimise the impacts of construction of the Scheme the Applicant will be committed to "*Conduct a Stage 1 Road Safety Audit at all access junctions to recommend additional safety measures at the access points*". The council would seek further than that, so the submission for Wiltshire Highways approval of all detailed layout and construction drawings together with a supporting Stage 2 Road Safety Audit. This would be in line with what the council would normally seek under a s278 Agreement under the Highways Act 1980, or as now proposed in the DCO, an agreement under Article 15. As previously noted, this entering into an agreement under Article 15 for permanent access works should not be discretionary but mandatory to ensure that works are carried out to the council's adoptable standards and standard highway details.	The Council's normal requirements in relation to access points is noted. Paragraph 13.11.1 of **ES Volume 1, Chapter 13: Transport and Access [APP-065]** has been updated to specify the requirement for a Stage 1 and Stage 2 Road Safety Audit and will be submitted at Deadline 1 of Examination. As noted above, article 11 of the draft DCO requires permanent works to be carried out to the reasonable satisfaction of the street authority.
WC-348	Transport and Access	Document Review	Appendix 13-1 Transport Assessment [APP-233] 25. Many parts of the supporting Transport Assessment simply mimic the content taken from it into Chapter 13 of the	The Applicant notes this comment.

			Environmental Statement. As such, commentary is not replicated on points already raised but focus on supporting information solely in the Transport Assessment.	
WC-349	Transport and Access	Document Review	26. Annex C shows the 'Solar PV Sites Access Drawings, so access references 1-20 inclusive. However, these only show the swept paths for 16.5m articulated HGVs and 'indicative' black lines showing the necessary extent of the access width and bell-mouth, so assumed to be the position of new intended kerbing. These are not sufficient in themselves for highway works approval, as there are no details of the new 'apron' construction, kerbing, 'tie-in' jointing to the existing carriageway and, where drainage ditches are present, any new culverts or changes to existing. The council's Highways Development Management officer makes this point because of the previously raised concern about the precise wording of Article 14, as this implies that approval by the highway authority is only required for new access locations proposed beyond those set out in Schedule 7, Parts 1 and 2. In short, all the accesses in Schedule 7, whether permanent or temporary (so all those included in the Annex C drawings), are seemingly deemed approved in at least principle under powers conferred in Article 14. This is unacceptable as the drawings in Annex C are only 'Preliminary' in nature, and do not include the	Please refer to the Applicant's responses to paragraphs 14.5, 14.3 and 14.12, and to paragraph 12 of the Council's Appendix.

			construction detail the council would expect to see in a s278 submission.	
WC-350	Transport and Access	Document Review	27. Annex D includes the 'Cable Route Corridor Access Drawings' and, whilst most of these are temporary accesses for construction purposes only, the above comments made in respect of the Solar PV site accesses are equally applicable. The drawings for each access show the swept paths associated with a 10.2m tipper and indicative proposed kerb-lines to accommodate these. In short there is	Please refer to the Applicant's responses to paragraphs 14.5, 14.3 and 14.12, and to paragraph 12 of the Council's Appendix.

			an absence of construction detail whilst, in many cases, the Ordnance Survey background is very sketchy or almost non-existent. The lack of background makes it unclear whether drainage ditches are affected, and so any works associated with temporary piping necessary. Again, it is difficult to see how deemed consent under Article 14 can be acceptable, without a DCO 'Requirement' for full submission and approval of the temporary access proposals by the Wiltshire Council Network Management team.	
WC-351	Transport and Access	Document Review	28. Annex E shows the 'Solar PV Sites Trip Generation Calculations' for the construction phase, so as requested in past comments on the 'Scoping Note' the under-riding assumptions used in determining the HGV types and numbers set out in Table 13-12 in the Transport Assessment (Table 13-20 in the ES). The Annex information shown in respect of HGVs still provides no specific assessed quantities of material volumes and component type / numbers for 'each' Lime Down Site and based on 'average' loadings, how this translates to the predicted HGV numbers and types shown in Table 13.12. The Transport Assessment main text provides no explanatory information on the calculations included in Annex E, whilst the spreadsheet printouts themselves provide no notes. The calculations undertaken for Modules and Mounting Structures for each Lime Down Site are set out, but it is unclear what the 1.2 'Ratio' figure	For explanation on Trip Generation Calculations please refer to the Applicant's responses to Paragraph 14.11.

			used represents but assumed to be a reduced loading factor per HGV. However, aggregate volumes are not determined on a Lime Down site-by-site basis, or on what basis, so the total access track length and its width / depth of construction. It is noted the 'waste' calculation accounts for only removal of packaging, so excludes any removal of excavated material associated with the construction of the access trackways and the foundation bases for the BESS and 440kV and 132KV substations. This could be a significant amount of off-site disposal of spoil, unless it is being assumed that all excavated material is reused on site / or transported offsite as required in the same tippers used for the incoming supply of aggregate. However, nothing is stated so this does need clarifying.	

WC-352	Transport and Access	Document Review	29. Annex H shows the 'Construction Route Swept Path Analysis'. Drawings SP34 and SP36 show the swept path analysis 'passage' for a 16.5m articulated HGV and an estate car on the Lime Down Site D access route between Dyson Roundabout and Bradfield Cottages (Drawings SP34 and SP36). What is clear from these analyses, is that the existing carriageway width is, for the most part, only able to pass an HGV and a car. Furthermore, and as indicated further on the two drawings, parts of the route do not even accommodate passage for a car / HGV, requiring one driver to wait in a suitable location to allow passage of the other through the 'narrowed' sections. Some of these restricted passage sections appear quite long, as indicated by the intervisibility distances shown between passing points. No part of the route has been assessed for passing opportunity for two opposing HGVs, which given the level of predicted HGV trafficking associated with Lime Down Site D is a real concern. Table 13-12 in the Transport Assessment (Table 13-20 in the ES) shows a predicted 76 HGV movements per day on this route, whilst background flows at Location 12 'Bradfield Cottages' indicate daily vehicle flows of 1,396 with an HGV content of 3.3% (46). The daily flow and critically the number of existing HGVs is much higher at Location 12 'Road East of Hullavington'. In view of the existing flows and predicted HGV movements during the construction of Lime Down	In relation to comments on passing opportunities for two HGVs on the routes specified in this comment please refer to the Applicant's responses to Paragraph 14.7, 14.8 and 14.9.

			Site D, it cannot be assumed that a need for 2-way HGV passage will not be needed along this length of access route, or indeed that it will be infrequent despite best efforts in coordinating timings for arriving /exiting HGVs. The swept analysis along this route thus needs to consider existing opportunities for 2-way HGV passage and whether this is adequate, particularly the part to the north-west of the junction with The Street at Grittleton. As noted, the DCO and identified Works Plans do not identify or propose any part of this route as requiring widening improvements. However, there remains a concern that the level of increased HGV trafficking will require some level of intervention to ensure there is adequate passing opportunity for two opposing HGVs. In short, the current level of presented analysis does not give sufficient comfort that this passage issue won't lead to highway operating and safety issues.	
WC-353	Transport and Access	Document Review	30. Drawings SP35 and SP38 in Annex H show the same HGV / car swept path analysis for the access route between Fosse Way and Lime Down Site A. Whilst the expected daily HGV movements associated with Lime Down Site A and background HGV flows along this length of minor road are much reduced, it would still be useful to understand what level of constraint exists to 2-way HGV passage.	In relation to comments on passing opportunities for two HGVs on the routes specified in this comment please refer to the Applicant's responses to Paragraph 14.8.

WC-354	Transport and Access	Document Review	31. Drawings SP42 and SP47 in Annex H again shows the HGV / car swept path passage analysis for a length of Fosse Way and Alderton Road. It is further noted from the Works Plans in the Environmental Statement that a significant part of this length is indicated as a Highway Improvement Area on Sheet 18 (Works Ref 8A). However, it remains unclear from Drawing SP47 as to what improvement works are proposed based on the analysis, whilst noting its specific inclusion as an HIA in the DCO. It is further noted that significant parts of the route section are narrow and unable to pass an HGV / car, so relying on opposing driver inter-visibility through the lengths of narrowing. Given this part of the highway network will be required to accommodate the HGV trafficking associated with Lime Down Sites A-C, there is a concern that no assessment has been done to consider passage opportunities for two opposing HGVs.	In relation to comments on passing opportunities for two HGVs on the routes specified in this comment please refer to the Applicant's responses to Paragraph 14.9. The detail of mitigation within the Highway Improvement Areas, which is likely to comprise carriageway widening, will be submitted as part of the Technical Approval process, as set out in the **Outline Construction Traffic Management Plan (CTMP) [APP-287]** which is secured by a requirement of the DCO.
WC-355	Transport and Access	Document Review	32. Drawings SP43-SP46 provide the swept path analysis for the remaining part of Fosse Way proposed for construction access. The assessment, which is again based on achieving passage for an HGV / car only, suggests that there are significant lengths where the existing carriageway width is also insufficient to accommodate even this 2-way passage without verge over-run / or one driver waiting at a suitable passing point. Some of the inter-visibility distances	In relation to comments on passing opportunities for two HGVs on the routes specified in this comment please refer to the Applicant's responses to Paragraph 14.9.

			measured between possible passing points are quite long and, in some cases, up to 215m, which is a concern albeit the alignment being relatively straight for the most part. It is noted from Google Earth imagery that Fosse Way typically has flat mown verges either side of its relatively narrow carriageway, so the risk of over-run damage with only moderate levels of increased HGV trafficking could be significant. Again, as no analyses examining 2-way HGV passage opportunity has been undertaken, it is not currently known whether two HGVs could pass anywhere along the length of Fosse Way without over-riding / damaging the grass verges.	
WC-356	Transport and Access	Document Review	ES Vol 1, 6.1 Chapter 21 Cumulative and In-Combination Effects [APP-073]; ES Vol 2, 6.2 Figure 21-1 Location of Short List Cumulative Developments [APP-178]; ES Vol 2, 6.2 Figure 21-2 Location of Cumulative Solar Infrastructure [APP-179]; and ES Vol 3, 6.3 Appendix 21-1 Long List of In-Combination Effects and Cumulative Developments [APP-264] 33. In Table 21.9 'Potential in-combination effects during construction and decommissioning' and specifically Receptor TP145 'Fosse Way', the Transport and Access impact scoring is stated as 'Minor Adverse'. However as noted in comments on the Transport Assessment and expressly Annex H, there are concerns about highway damage as the carriageway width is quite narrow with long sections unable	In relation to comments on passing opportunities for two HGVs on the routes specified in this comment please refer to the Applicant's responses to Paragraph 14.7, 14.8 and 14.9. As set out in the **Outline Construction Traffic Management Plan (CTMP) [APP-287]**, pre-construction, interim and post-construction Road Condition Surveys will be undertaken to repair any damage caused to verges during the construction period. The details of these surveys will be confirmed as part of the Final CTMP.

			to accommodate the passage of an HGV / car, let alone two HGVs. It is unclear why the road from Dyson Road to Bradfield Cottages is excluded as an assessed receptor, given the expected level of HGV trafficking during construction. As noted, there is also concern about two-way passage for HGVs here, especially to the north-west of the crossroads junction with The Street (Grittleton).	
WC-357	Transport and Access	Document Review	ES Vol 1, 6.1 Chapter 22 Summary of Residual Effects [APP-074] 34. It is concluded in respect of 'Transport and Access' that "*No significant residual effects on transport and access are predicted during the construction of the Scheme*". However, there are concerns about 2-way passage possible on some of the minor roads serving as construction access to Lime Down Sites A-C and Lime Down Site D. The swept path assessments included in Annex H to the Transport Assessment show that significant lengths have a carriageway width which is unable to accommodate the passage of a car / HGV without verge or potentially footway over-run. The 2-way passage opportunities for two opposing HGVs are not even additionally considered, this on the basis that such occurrences will be very infrequent and no greater risk than now. Given the level of expected HGV construction trafficking along the route to Bradfield Cottages (Lime Down Site D), the	In relation to comments on passing opportunities for two HGVs on the routes specified in this comment please refer to the Applicant's responses to Paragraph 14.7.

			council considers the risk of two HGVs needing to pass here to be much greater, but no mitigation or works are proposed.	
WC-358	Transport and Access	Document Review	7.7 Consents and Agreements Position Statement [APP-272] 35. Highway Development Management comments have been made earlier about provisions in Articles 10, 14 and 15 of the Draft DCO. Paragraph 1.4.2 of this document reiterates that "*The majority of consents required are included, or addressed, within the Draft DCO [EN010168/APP/3.1], as permitted by various provisions of the Planning Act 2008*" and "*Consent to alter the layout of streets and to form new, or alter or improve existing, accesses to the highway. Articles 10, 11 and 14 of the Draft DCO [EN010168/APP/3.1] provides this power*". However, there is concern that this gives deemed consent to access works where details are absent and provides no 'requirement' for seeking Technical Approval from Wiltshire Council.	Please refer to the Applicant's responses to paragraphs 14.5, 14.3 and 14.12, and to paragraph 12 of the Council's Appendix.

WC-359	Transport and Access	Document Review	7.12 Outline Construction Environmental Management Plan [APP-277] 36. Paragraph 1.3.4 states that "*A series of highway improvements would be made to facilitate the Scheme. The location of the Highway Improvement Areas are shown in ES Volume 2, Figure 2-1 [EN010168/APP/6.2]. Works within the Highway Improvement Areas comprise improvements to the existing highway such as improvements to road edge where it is deteriorated, minor works to enable construction vehicle movements such as provision of passing places within the existing highways boundary, and provision of visibility splays. The final number and dimensions of the passing places will be confirmed as the design progresses and through further discussion with Wiltshire Council*". This as implies commits only to highway improvement works within the Identified HIAs, such as passing place improvements. As such, in the case of some of the minor roads excluded, but where concerns have been raised about 2-way passage, the undertaker is seemingly under no obligation to mitigate or put in place measures should inadequacy of passage for HGVs and associated highway safety issues occur.	In relation to comments on passing opportunities for two HGVs on the routes specified in this comment please refer to the Applicant's responses to Paragraph 14.7, 14.8 and 14.9. The detail of mitigation within the Highway Improvement Areas, which is likely to comprise carriageway widening, will be submitted as part of the Technical Approval process, as set out in the **OCTMP [APP-287]**, which is secured by a requirement of the DCO.

WC-360	Transport and Access	Document Review	37. Where reference is made to the Outline CTMP in Sections 2.7 'Traffic Management, 2.8 'Off-Site Delivery Routes' and 2.9 'Parking Provisions', comments have been made separately under the CTMP section below. 38. Table 7 'Transport and Access' states in part: "*The Offsite Highway Improvement Areas are sections of the highway network that will either contain localised improvements, such as passing areas, or traffic management. These areas will support the movement of construction vehicles on narrower sections of the local highway network*". As noted, there is concern that the proposed extent of the HIAs falls short well short of all the minor road locations which may need improvements to facilitate satisfactory two-way passage. The commitment to a 'Road Condition Survey' is welcomed and it is noted that "*The extent of the survey will be agreed with the local highway authority prior to commencement*". Based on the findings of the swept path analyses along the minor roads to be used for construction access (Annex H - Transport Assessment), it is the council's Highways Development Management officer's view that survey coverage will need to include Alderton Road, Fosse Way and the unnamed road between Fosse Way and Sherston, as well as the route between Dyson Roundabout and Bradfield Cottages.	In relation to comments on passing opportunities for two HGVs on the routes specified in this comment please refer to the Applicant's responses to Paragraph 14.7, 14.8 and 14.9. . As set out in the **OCTMP [APP-287]** pre-construction, interim and post-construction Road Condition Surveys will be undertaken to repair any damage caused to verges during the construction period. The details of these surveys will be confirmed as part of the Final CTMP.

WC-361	Transport and Access	Document Review	7.13 Outline Operational Environmental Management Plan [APP-278] 39. It is accepted that trafficking during the operation phase associated with ongoing maintenance will be minimal and will use for the most part the accesses created or improved to facilitate construction, where these are proposed to be permanent. It is understood that suitable 'hard standing' turning areas will be available within the sites to allow any maintenance vehicles to exit in forward gear which is acceptable.	The Applicant notes this comment.
WC-362	Transport and Access	Document Review	7.14 Outline Decommissioning Strategy [APP-279] 40. It is noted in paragraph 2.6.2 under 'Traffic Management and Parking Provision' that "A Decommissioning Traffic Management Plan (DTMP) will be developed by a Contractor prior to decommissioning in consultation with the appropriate Local Planning Authority. The DTMP will use the detailed CTMP to reflect the circumstances prevailing during the period in which decommissioning is to be carried out". This is acceptable and appropriate as it is clearly not possible now to predetermine what local highway conditions will be like in 2089 when decommissioning is expected to commence.	The Applicant notes this comment.

WC-363	Transport and Access	Document Review	7.22 Outline Construction Traffic Management Plan [APP-287] 41. Paragraph 1.3.1 states in part that the oCTMP is: "*an evolving document that will be updated prior to construction to reflect any considerations made during the DCO process, and to add detail that arises from the post-determination procurement and Engineering Principal Contractor (EPC) appointment. A Final CTMP and Operation Traffic Outline Construction Traffic Management Plan Management Plan (OTMP) in substantial accord with this Outline CTMP, will be approved by Wiltshire Council and South Gloucestershire Council, as the local planning and highway authorities, prior to construction commencing*". The future need for a 'detailed 'CTMP is accepted, but what may be preferably needed is separate CTMPs for the different Lime Down Sites, although it may be possible to combine these plans where works / signage needs are concurrent and use the same proposed construction access route (so for example Lime Down Sites A and B). It is noted that a lot of the oCTMP content is replicated from the Transport Assessment already reviewed, so comments already made are not replicated here. For example, Appendices A and B include the same Solar PV site and Cable Route access drawings as the Transport Assessment already reviewed.	The **OCTMP [APP-287]** will be updated to specify an option for separate Final CTMPs to be prepared for each Lime Down Solar PV Site and the Cable Route Corridor. This will be submitted at Deadline 1 of Examination.

WC-364	Transport and Access	Document Review	42. Section 2.3 'Detailed Design' states in part that "*Prior to carrying out a work to the public highway, the detailed design of such works must be submitted to the highway authority for approval*". This goes on to say that this will include in part a construction programme for the works, a method statement, any traffic management proposals, detailed technical drawings and a Stage 1-2 RSA. This is welcomed but is not considered a substitute for 'requiring' bespoke highway agreements under Article 15 of the DCO for all works undertaken within the public highway. These agreements should subsume the technical approval requirement of all drawings and allied documentation for the design of the permanent highway works anyway, which should not be a CTMP matter. Furthermore, formal agreements are needed to put in place, for example, Bond requirements, suitable indemnity provision for Wiltshire Council against claims arising from the undertakers works on the highway and provision for Wiltshire Council inspection / sign-off during construction including supervision fees. None of that is covered in the oCTMP.	Detailed design drawings and Stage 2 Road Safety Audits will be provided as part of the Technical Approval process as a requirement of the DCO. The **OCTMP [APP-287]** will be updated to confirm this and will be submitted at Deadline 1 of Examination. The detailed design of highway works will be included in the detailed CTMPs as these must be substantially in accordance with the OCTMP, as per Requirement 15 of the **draft DCO [APP-016].** A fee is payable for each application to discharge a requirement, as set out in Schedule 16 of the draft DCO. Please also refer to the Applicant's responses to paragraphs 14.5, 14.3 and 14.12, and to paragraph 12 of the Council's Appendix, which set out how the DCO secures that works to the highway must be completed to the reasonable satisfaction of the street authority.

WC-365	Transport and Access	Document Review	43. Section 4.6 'Highway Improvement Areas' states in part "*All construction routes can accommodate construction vehicle movements, with Highway Improvement Areas in place. Where the construction routes pass through sections of road that are considered narrow and require widening or require surfacing works, these have been adopted into the design as 'Highway Improvement Areas'. This will ensure that sufficient passing room is present along the routes or traffic management is implemented to ensure the safe movement of construction vehicles*". As noted previously and based on the review of swept path drawings in Annex H to the Transport Assessment, the council has concerns that the identified extent of HIAs is insufficient and may lead to passage issues for HGVs along some of the minor roads excluded. This could lead to verge damage or potentially highway safety issues if conflicts result in a need for lengthy vehicle reversing movements to a suitable passing point.	In relation to comments on passing opportunities for two HGVs on the routes specified in this comment please refer to the Applicant's responses to Paragraph 14.7, 14.8 and 14.9. As set out in the **OCTMP [APP-287]** pre-construction, interim and post-construction Road Condition Surveys will be undertaken to repair any damage caused to verges during the construction period. The details of these surveys will be confirmed as part of the Final CTMP.

WC-366	Transport and Access	Document Review	44. Sub-section 6.1.2 'Road Condition Survey' discusses route lengths to be included in the surveys, this based on the council's earlier comments on the submitted Scoping Note for the Transport Assessment / oCTMP. However, having now reviewed the detailed swept path analyses in Annex H to the Transport Assessment, it is the council's Highways Development Management officer's view that coverage would need to be extended to include Fosse Way and potentially Alderton Road. It is noted that the oCTMP states that: "*The extent of the survey will be agreed with the local highway authority prior to commencement and as part of the Final CTMP*", so scope appears to be available to increase the before and after highway condition monitoring.	The Applicant notes this comment.
WC-367	Transport and Access	Document Review	7.24 Potential Main Issues for Examination [APP-289] 45. Section 2.11 and expressly Table 2.7 set outs the PMIEs identified by Wiltshire Council. WC31 identified the need for more supporting background information concerning the predicted numbers of total HGV movements associated with the Solar Farm sites, which has been commented on above in reviewing the information now available in Annex E to the submitted Transport Assessment. However, now that the full content of the Transport Assessment is available, and expressly the swept path analyses in Annex H, there is a concern about available	In relation to comments on Trip Generation please refer to the Applicant's responses to Paragraph 14.11. In relation to comments on passing opportunities for two HGVs please refer to the Applicant's responses to Paragraph 14.7, 14.8 and 14.9.

			carriageway widths and passing opportunity for HGVs on some of the minor roads needed for construction access which lie outside the identified HIAs.	
WC-368	Transport and Access	Document Review	7.26 Commitments Register [APP-291] 46. Comments have been made above elsewhere, but looking at 'Transport and Access' mitigations 'committed' to' in the table, one of these states: "*All construction routes can accommodate construction vehicle movements, with Highway Improvement Areas in place. Where the construction routes pass through sections of road that are considered narrow and require widening, these have been adopted into the design as 'Highway Improvement Areas' which will ensure that sufficient passing room is present along the routes or traffic management is implemented to ensure the safe movement of construction vehicles*". 47. As commented, the council's Highways Development Management officer's concern is that the construction route lengths identified for HIAs in the	In relation to comments on passing opportunities on construction routes please refer to the Applicant's responses to Paragraph 14.7, 14.8 and 14.9.

			DCO, so potentially needing localised carriageway widening of a permanent or temporary nature to facilitate HGV passage, are too limited in extent.	

2.2 Somerset Council

Table 2-2 RR-4402

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
SC-001	Description and DCO process	Registration	Somerset Council are the neighbouring Local Planning Authority (LPA) and have been invited under Section 56 of the Planning Act 2008 to register as an interested party. The LPA have registered to ensure that we are informed of the progress of the Examination and have the opportunity to attend the Preliminary meeting and hearings that take place during the Examination.	The Applicant notes this comment and welcomes any further input Somerset Council may wish to have on the Scheme.

2.3 Bath and North East Somerset Council

Table 2-3 RR-0455

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
BNESC-001	Description and DCO process	No comment	Bath and North East Somerset Local Planning Authority has reviewed the scheme. The construction access routes would not affect the Bath and North East Somerset Authority area. Bath and North East Somerset Council therefore have no comment to make with regard to the proposed project.	The Applicant notes this comment.

3 The Applicant's responses to statutory consultees, undertakers and notable parties with whom the Applicant has seeking to undertake a Statement of Common Ground

3.1 Environment Agency

Table 3-1 RR-1394

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
EA-001	Description and DCO Process	Introduction	We are advised that, on 17 October 2025, an application (reference: EN010168) for Lime Down Solar Farm Development Consent Order (DCO) was accepted by the Planning Inspectorate for Examination. These Relevant Representations contain an overview of the project's issues which fall within our remit. They are given without prejudice to any future detailed representations that we may make throughout the examination process. We may also have further representations to make when supplementary information becomes available in relation to the project. We have reviewed the draft DCO, Environmental Statement (ES) and supporting documents that were submitted to the Planning Inspectorate as part of the above-mentioned application. Our key issues are listed below and explored in detail within Appendix B, while additional advice and informatives for the water fra Applicant are provided in	The Applicant notes this comment.

			Appendix C. The Environment Agency's current position on the draft DCO is summarised in Appendix A.	
EA-002	Description and DCO Process	Summary	Summary of Environment Agency position 1. Draft Development Consent Order • We request to be a named consultee for the discharge of Requirements 13, 14 and 17. • Protective Provisions for the disapplication of Flood Risk Activity Permits under the Environmental Permitting Regulations (EPR) 2016 have not been agreed.	In response to each of the points raised: • The Applicant accepts the inclusion of the EA as a consultee for the discharge of Requirements 13 and 14 and this change will be incorporated into the next version of the draft DCO. It is not clear what specific reason the EA would require to be consulted regarding the Soil Resources Management Plan. The EA is already a consultee for the Battery Safety Management Plan (Req 6), Surface and Foul Water Drainage (Req 11), and the Decommissioning Strategy (Req 20). • The Applicant acknowledges that negotiation of Protective Provisions for the Environment Agency will occur through the Examination process. The Applicant's preferred version of those Protective Provisions but once these are agreed with the

				EA an agreed version will be incorporated into the Draft DCO.
EA-003	Ecology and Biodiversity	Groundwater and Contamination	2. Environmental Statement Fisheries, Biodiversity and Geomorphology • A clear plan and schedule is required detailing the extent and nature of works directly impacting on watercourses. Ensure Chapter 9 assesses the impact of these, with other documents updated as appropriate. • Chapter 9 should explicitly assess impacts upon aquatic invertebrates and macrophytes, including mitigation measures, where appropriate.	The Applicant confirms that works with potential to affect watercourses, including crossings and works within or adjacent to watercourse corridors, are controlled through the draft DCO Requirements and the discharge process, with detailed method statements secured prior to construction. Trenchless techniques, including HDD where appropriate, will be used at sensitive crossings in accordance with the **Design Principles and Parameters [APP-269]**, and detailed methodologies will be agreed with the relevant authorities. The location and nature of watercourse interactions have been assessed within **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [APP-063]** and **ES Volume 3, Appendix 11-1 to 11-18 Flood Risk Assessment and Drainage Strategy [APP-210 to APP-218]**. Embedded mitigation, including buffers, prescribed working methods and protection of watercourses, is secured through the **Outline Construction Environmental Management Plan [APP-277]** and the DCO discharge process. A new appendix to **ES Volume 1, Chapter 9: Ecology and Biodiversity** will be submitted at Deadline 1 which provides habitat descriptions and

				photographs of all watercourse crossing points, as well as the construction methodology to be used at each crossing point, for clarity. In addition, **ES, Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]** has been revised to include a separate section for Aquatic Invertebrates (excluding white clawed crayfish, which is covered in its respective section), and additional text has been included on aquatic macrophytes within existing sections relating to plants. No significant residual adverse effects are anticipated for either of these species groups, and the revised Chapter will be submitted at Deadline 1.
EA-004	Ground Conditions	Groundwater and Contamination	Groundwater and Contaminated Land • Current proposals increase risk of contamination; please consider whether shallower foundation solutions can be sufficient. A Foundation Works Risk Assessment should be produced for all piled and deep foundation works. • More information is needed on the proposed drainage system for the Battery Energy Storage System, including how this will interact with foundation structures. • Clarify the piled foundations decommissioning proposals. • The likelihood of encountering groundwater within cable corridors, needs to be reassessed and adequate mitigation provided. • A Discovery and Inspection Strategy should be in place for excavation activities during the operational phase, and apply to the entire proposal.	A Piling Risk Assessment is outlined as a requirement within the **Outline Construction Environmental Management Plan (Outline CEMP) [APP-277]** to assess risks associated with piling and other penetrative ground improvement methods, in line with the CL:AIRE guidance Piling and Penetrative Ground Improvement Methods on Land Affected by Contamination: Guidance on Pollution Prevention. The Outline CEMP is secured by a requirement in Schedule 2 of the **Draft DCO [APP-016]**, which requires the detailed CEMP to be submitted and approved prior to construction and to be substantially in accordance with the **Outline CEMP [APP-277]**. In addition, separate BESS and Substation - Geotechnical Risk Register Cable Route and Avoidance Areas -

				Geotechnical Risk Register are being developed for piling and HDD works and will be submitted at Deadline 1. This document will identify location specific risks where activities occur at greater depths and to inform appropriate management measures prior to construction. Where required, mitigation may include alternative foundation solutions or adjustments to cable installation techniques and pile design to reduce potential risks to groundwater and contaminated land. (No new mitigation beyond the controls already described is introduced here.) A Discovery and Inspection Strategy is secured through the **Outline CEMP [APP-277]** and will apply to excavation activities across the entire Scheme, ensuring any unexpected ground conditions or contamination encountered are identified and managed in accordance with the approved CEMP. For clarity, the pile depths will be confirmed as part of the detailed design process. Any such details will be implemented through the CEMP approval pathway secured by Schedule 2 of the **Draft DCO [APP-016]**.

EA-005	Hydrology, Flood Risk and Drainage	Flood Risk	Flood Risk • Amendments are needed to the Flood Risk Assessment to clarify whether there is any development within functional floodplain; consider the impact of fencing and solar panel support frames and confirm freeboard allowances. • The construction phase needs to be considered. • We need to review the Gauze Brook hydraulic model files.	The Applicant agrees that a minor clarification would be helpful to explicitly confirm that there is no development within the functional floodplain (Flood Zone 3b). The Flood Risk Assessment already considers the interaction of fencing and solar panel support frames with floodplain processes and demonstrates that any displacement is de minimis, with appropriate freeboard allowances applied where relevant; this will be clarified within the **Flood Risk Assessment and Drainage Strategy appendices for Lime Down D [APP-215] and Lime Down E2 [APP-217]**, with no change to conclusions, as summarised in **ES, Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [APP-063]**. Construction phase flood risk has already been assessed within **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [APP-063]** between Paragraphs 11.10.2 and 11.10.32 under the subheading 'Construction'. Flood risk is controlled through embedded mitigation and approval of detailed construction arrangements under the **Outline CEMP [APP-277]**, secured by the **Draft DCO [APP-016]**. No additional construction phase assessment is required. The Applicant notes the request to review the Gauze Brook hydraulic model and will provide the hydraulic modelling report and associated model files to the Environment Agency at Deadline 1 to support ongoing technical review. The Applicant will

				update the relevant application documents as set out above. The Applicant will submit the updated appendices and provide the Gauze Brook modelling report and associated model files as part of Deadline 1 to support the Environment Agency's ongoing technical review.

EA-006	Construction and Decommissioning	Decommissioning Environmental Management Plan	Other Documents • There is no clear commitment to the production of an outline or detailed Decommissioning Environmental Management Plan.	Measures to manage and minimise disruption during decommissioning are set out in the **Outline Decommissioning Strategy (ODS) [APP-279]**. The **ODS [APP-279]** explains how mitigation measures identified in the Environmental Statement (ES) will be implemented during decommissioning and includes controls for working hours, noise, lighting, traffic management, pollution prevention, waste management and community liaison. The **ODS [APP-279]** also confirms that decommissioning activities will be undertaken in phases over an anticipated 12–24 month period, with measures to coordinate traffic movements, control noise and vibration in accordance with best practicable means, and manage temporary lighting to minimise effects on nearby receptors. A detailed Decommissioning Strategy will be prepared substantially in accordance with the **ODS [APP-279]** and must be submitted to and approved by the relevant local planning authority prior to the commencement of decommissioning. This is secured through Requirement 20 in Schedule 2 of the **Draft DCO [APP-016]**.

EA-007	Ecology and Biodiversity	Biodiversity Net Gain	• A full Biodiversity Net Gain metric spreadsheet, condition assessment data and a means of cross referencing baseline (including condition) and post development habitat proposals with a plan needs to be provided.	Please refer to the Applicant's detailed responses on these matters below. Responses have been provided below to detailed comments relating to recommended provision of the full Biodiversity Net Gain metric and full baseline and condition assessment information.
EA-008	Other Environmental Matters	Battery Safety	• Further details of fire water supply and storage are needed in the Outline Battery Safety Management Plan.	The Applicant's **Outline Battery Safety Management Plan (OBSMP) [APP-286]** covers all requisite water supply and storage details, namely: • The BESS Area will be designed to integrate firefighting designed to integrate pressure fed (pump driven) fire hydrants fed from water tanks. Hydrants will be located in consultation with D&WFRS to provide redundancy and safe operating distances for firefighters. • The BESS Area will contain a minimum of two firefighting water storage tanks (the tanks will contain potable water) of no less than 228,000 litres in capacity, capable of delivering 1900 litres per minute for 4 hours (exceeding NFCC guidance). • Water storage will either be in sectional panel tanks, or cylindrical tanks, above or below ground. Where above ground, tanks will be supported on structural concrete slab

				foundations to a maximum depth of 1m. • If an internal BESS water based fixed suppression system (automatic or dry pipe) is integrated in the BESS enclosures a separate water supply and water containment system will be integrated, water runoff is likely to contain higher levels of pollutants compared to water used for external boundary cooling of BESS and ESS equipment. • The firefighting water requirement will be fully assessed at the detailed design stage based upon BESS fire and explosion test data by an independent Fire Protection Engineer and water storage volumes will be agreed with D&WFRS during detailed design.
EA-009	Hydrology, Flood Risk and Drainage	Water Framework Directive	• The Water Framework Directive (WFD) Assessment needs to be updated to account for Groundwater Dependent Terrestrial Ecosystems. Consideration needs to be made of how the subsurface infrastructure interacts with WFD Groundwater Bodies.	The Applicant agrees that the **Water Framework Directive Assessment [APP-276]** should be updated to explicitly address Groundwater Dependent Terrestrial Ecosystems and to clarify the interaction between subsurface infrastructure and WFD groundwater bodies. While groundwater bodies are screened and assessed, the current document does not expressly set out the assessment of GWDTEs or the potential mechanisms by which subsurface works could interact with them. The Applicant will therefore update the **Water Framework Directive Assessment [APP-276]** to include a

				specific consideration of GWDTEs and a clear explanation of how subsurface infrastructure, including cable installation and foundations, interacts with WFD groundwater bodies, confirming that no deterioration or constraint to objectives would arise. The conclusions of the assessment will remain unchanged. The updated Water Framework Directive Assessment will be submitted at Deadline 1.
EA-010	Hydrology, Flood Risk and Drainage	Water Quality Mitigation Measures	• More Water Quality Mitigation Measures need to be included in the Outline Construction Environmental Management Plan.	The Applicant does not agree that additional outline-stage water quality mitigation is required. The **Outline Construction Environmental Management Plan (Outline CEMP) [APP-277]** already sets out a comprehensive suite of pollution prevention and water quality controls (including staff training and incident response, spill kits, bunded storage and refuelling controls, concrete washout management, temporary drainage and sediment control measures, protection of land drains and waterbodies, monitoring via a Water Management Plan, and commitments on stockpiles and materials storage outside Flood Zone 3 extents where practicable). The Applicant will continue engagement with the Environment Agency through Examination and the discharge process to confirm whether any further measures are

				considered necessary and proportionate, noting that the detailed controls will in any event be confirmed through the requirement to submit and secure approval of the detailed CEMP(s) prior to construction under the **Draft DCO [APP-016]**.
EA-011	Description and DCO Process	Environmental Commitments	• The commitments register should detail all environmental commitments secured by the proposal.	The **Commitments Register [APP-291]** was submitted as part of the DCO Application. This sets out the environmental mitigation measures that would be adopted during the construction, operation and maintenance, and decommissioning phases of the Scheme.
EA-012	Hydrology, Flood Risk and Drainage	Draft Development Consent Order	APPENDIX A – KEY ISSUES Draft Development Consent Order Disapplication of Legislative Provisions We note the Applicant is seeking disapplication of the Flood Risk Activity Permit(s) from the Environment Agency under the Environmental Permitting Regulations (England and Wales) 2016 in connection with drainage outfall installation. We would need the Applicant to provide details for any structures and a basic method statement for the works proposed before we can consider this request further. We have provided the Applicant with a copy of our standard protective provisions and would need justification for any changes before they are considered by our Legal team.	The Applicant notes the comments regarding the proposed disapplication of Flood Risk Activity Permits. Consultation with the Environment Agency on the proposed disapplication is ongoing and the Applicant will provide details of any relevant structures and a basic method statement to support the Environment Agency's consideration. The Applicant also notes the Environment Agency's standard protective provisions and will seek to agree protective provisions with the EA, with the agreed provisions to be incorporated into the **Draft DCO [APP-016].**

EA-013	Construction and Decommissioning	Requirements	Requirements Document Reference(s): APP-016 Draft Development Consent Order Schedule 2 Requirement 13 Construction environmental management plan (CEMP) Issue: The Environment Agency are not listed as a consultee for the discharge of Requirement 13 (CEMP). Impact The CEMP provides essential mitigation measures to prevent impacts from construction sites. We often encounter construction sites that have caused issues because their CEMP was either insufficient or was not adhered to. Potential monitoring requirements may not be adequate if the Environment Agency are not consulted on them. Solution: We request to be consulted on the CEMP to be approved under Requirement 13.	The Applicant accepts the inclusion of the EA as a consultee for the discharge of Requirement 13 and this change will be incorporated into the next version of the **Draft DCO [APP-016]**.
EA-014	Description and DCO Process	Draft Development Consent Order	Document Reference(s): APP-016 Draft Development Consent Order Schedule 2 Requirement 14 Operational environmental management plan (OEMP) Issue: The Environment Agency are not listed as a consultee for the discharge of Requirement 14 (OEMP). Impact: The OEMP provides essential mitigation measures to prevent impacts. Potential monitoring requirements may not be adequate if the Environment Agency are not consulted on them. Solution: We request to be consulted on	The Applicant accepts the inclusion of the EA as a consultee for the discharge of Requirement 14 and this change will be incorporated into the next version of the **Draft DCO [APP-016]**.

			the OEMP to be approved under Requirement 14.	
EA-015	Soils and Agriculture	Draft Development Consent Order	Document Reference(s): APP-016 Draft Development Consent Order Schedule 2 Requirement 17 Soil Management Issue: The Environment Agency are not listed as a consultee for the discharge of Requirement 17 Soil Management. Impact: Potential impacts to groundwater may not be adequately remediated and risks to groundwater from contamination may not be managed. Solution: We request to be consulted on the Soil Resources Management Plan to be approved under Requirement 17.	For the reasons provided in our response above, the Applicant does not consider that the EA needs to be included as a consultee for Requirement 17. The Applicant would need to understand the reasons from the Environment Agency.

EA-016	Ecology and Biodiversity	Fisheries, Biodiversity and Geomorphology	APPENDIX B KEY ISSUES Environmental Statement Fisheries, Biodiversity and Geomorphology Document Reference(s): APP-061 Environmental Statement Chapter 9: Ecology and Biodiversity; 9.12.48 Issue: Ensuring all fish species are protected during spawning when completing in channel works. Impact Damage to spawning habitat, loss of fish eggs and disturbance to spawning fish. Solution: The work avoidance period should also encompass the coarse fish spawning season, which runs from March 15th to June 15th (inclusive). This restriction applies in areas where coarse fish populations or spawning habitats are known to exist. However, if evidence confirms that the area is not used for spawning or that spawning fish are absent, in-channel works may proceed, provided that appropriate fish rescue measures are carried out. Additional narrative/ explanation (if necessary): Under the Salmon and Freshwater Fisheries Act 1975, it is an offence to wilfully disturb any spawn or spawning fish, or any bed, bank or shallow on which any spawn or spawning fish may be.	The Applicant notes this comment, and, as agreed, will seek to either avoid open-cut trenching works on the affected watercourses during the coarse fish spawning period (15th March - 15th June inclusive), or otherwise pre-commencement survey work will be undertaken to establish whether the avoidance period is required for each relevant watercourse crossing point. This may comprise habitat suitability assessments to establish whether suitable spawning habitat is present at each crossing point, or fish surveys to determine whether fish which may spawn in the watercourse are present/likely absent. The cable installation methodology to be used at each of the affected crossing points, as well as any required mitigation measures for spawning/migrating fish, would be discussed and agreed with the EA/relevant consenting body post-DCO consent, prior to work commencing. An updated version of the **Outline Ecological Protection and Mitigation Strategy [APP-284]** will be submitted which outlines this approach at Examination Deadline 1.

EA-017	Ecology and Biodiversity	Fisheries, Biodiversity and Geomorphology	Document Reference(s): APP-061 Chapter 9 Ecology and Biodiversity, APP-276 Appendix 11.1, Water Framework (WFD) Assessment, APP- 275 Habitats Regulations Assessment (HRA). APP-210 Appendix 11-1: Flood Risk Assessment and Drainage Strategy – Lime Down Covering Report; Table 5: Watercourse Crossing Issue: No habitat descriptions or photographs of watercourses are in Appendix 11.1. This makes it unclear how the preferred crossing methodology was determined. There is also inconsistency around the crossing of a main river SM5 (Gabriel's Well). The watercourse crossing schedule details the use of open cut technologies on SM5; despite the Environmental Statement and WFD assessment stating that open cut techniques would not be used on main rivers. The HRA document also does not mention SM5 as an open cut crossing. Impact It is not clear that the ecological impact of these crossings has been fully assessed and/or communicated in Chapter 9 regarding impacts on habitats and associated species (see subsequent comments in regard to aquatic invertebrates and macrophytes). Whilst we agree with the detail set out in paragraph 9.1.47 of Chapter 9, there remains a risk that some watercourses where an open-cut method is selected could have a significant impact on fish species—not only eels and brown/sea trout. Of particular concern are crossing	The Applicant notes this comment. A new appendix to **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]** will be submitted at Deadline 1 which provides habitat descriptions and photographs of all watercourse crossing points, as well as the construction methodology to be used at each crossing point, for clarity. The Applicant notes the inconsistency identified in relation to SM5 (Gabriel's Well). Where a crossing is of a main river, the Scheme approach is for a trenchless crossing using HDD rather than open cut, consistent with the Flood Risk Assessment and Drainage Strategy. Notwithstanding, the Applicant confirms that no watercourse crossing is proposed at SM5 and this has now been removed from the watercourse crossing schedule. This does not alter the assessed flood risk, drainage or environmental conclusions. The Applicant will update the relevant application documents as set out above.

			reference SM3 and SM5 which are both main river and may provide suitable habitat for fish. Solution: Provide a clear plan and schedule detailing extent and nature of works directly impacting upon watercourses. Provide habitat descriptions and photographs of proposed watercourse crossings and ensure Chapter 9 assesses the impact of these, with other documents updated as appropriate. This would provide confidence that the chosen crossing type is appropriate. Additional narrative/ explanation: Note this solution would also help inform the fisheries issue raised above.	
EA-018	Ecology and Biodiversity	Fisheries, Biodiversity and Geomorphology	Document Reference(s): APP-061 Chapter 9 Ecology and Biodiversity, APP-284 Outline Ecological Protection and Mitigation Strategy, APP-291 Commitments Register Issue: It is not clear what mitigation will be proposed and secured by the DCO. The commitments register and other documents should detail all environmental commitments secured by the proposal, including the following examples: 1. Chapter 9 makes reference to An existing crossing at Gabriel's Well watercourse in Lime Down E may need to be improved to ensure it meets construction/operation and maintenance vehicle requirements…..Any improved crossing here will be an open-span structure, with no incursion into the	The Applicant notes this comment. A full review of the commitments register has been undertaken in in line with the commitments proposed in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]** and the measures in the **Outline Ecological Protection and Mitigation Strategy [APP-284]** will be completed.

			channel and clearance of the banksides beneath the improved structure as per the existing crossing, ensuring no impediment to movement of water voles and otters at this location. This commitment does not appear to be represented in the commitments register. 2. The Outline Ecological Protection and Mitigation Strategy details that 'Culverted or overbridged ditches and watercourses should be designed to permit the continued passage of water voles, otters, and other riparian mammal species'. This commitment is not mentioned in the Commitments Register or Chapter 9. 3. Chapter 9 details that 'Culverts will be designed so that the flow of water through the channel is not impeded, including the base of the culvert being set beneath the existing channel bed'. This commitment is not identified in other documents such as the Outline Ecological Protection and Mitigation Strategy or the Commitments Register Impact: Risks to protected species are not adequately managed. Resulting in harm which is against legislation. Solution: Ensure the documents are consistent in the mitigation proposed for watercourse crossings.	

EA-019	Ecology and Biodiversity	Fisheries, Biodiversity and Geomorphology	Document Reference(s): APP-061 Chapter 9 Ecology and Biodiversity Issue: Ecological assessments are incomplete. With the exception of white clawed crayfish, aquatic invertebrates/ macrophytes have not been assessed. These may be affected by physical damage to habitats and habitat fragmentation caused by watercourse crossings. Impact: Ecological impacts upon these features have not been assessed nor requirements for mitigation confirmed. Therefore, protected species are not appropriately protected. Solution: Chapter 9 should explicitly assess impacts upon aquatic invertebrates and macrophytes where appropriate. Mitigation measures should be provided.	Potential impacts on aquatic invertebrates and macrophytes are considered to have been captured in the assessment in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]** sections relating to Freshwater Fish and White Clawed Crayfish, as all of these species/groups are susceptible to similar impacts, such as direct damage to watercourses, dust/sediment deposition and other pollution events. However, for clarity, the **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]** has been revised to include a separate section for Aquatic Invertebrates (excluding white clawed crayfish, which is covered in its respective section), and additional text has been included on aquatic macrophytes within existing sections relating to plants. No significant residual adverse effects are anticipated for either of these species groups, and the revised Chapter will be submitted at Deadline 1.
EA-020	Ecology and Biodiversity	Fisheries, Biodiversity and Geomorphology	Document Reference(s): APP-061 Chapter 9 Ecology and Biodiversity Issue: There is some evidence that Solar PV modules can negatively affect aquatic invertebrates by having an attractant effect, which is an impact pathway not mentioned with the ecological impact assessment. Impact: Protected species are not appropriately protected. Solution: Chapter 9 should explicitly assess impacts upon aquatic invertebrates and macrophytes where	The Applicant notes this comment. There is a perception that that some aquatic invertebrates such as mayflies, dragonflies and caddisflies which normally lay their eggs on or close to the surface of waterbodies have been found to also lay their eggs on the surface of solar panels, which typically stems from single study (Horvath et al. (2010) Reducing the Maladaptive Attractiveness of Solar Panels to Polarotactic Insects. Conservation Biology, 24, 1644-1653). This is assumed to be due to the attraction of these polarotactic species to surfaces that reflect horizontally polarised

			appropriate. Mitigation measures should be provided.	light (a trait shared by waterbodies and some solar panels). Aquatic invertebrate eggs mistakenly laid on solar panels results in egg desiccation and subsequently, reproductive failure. However, there is little evidence that this can have a significant impact at a population level. The vast majority (over 88%) of the habitats within the Solar PV Sites are arable, with waterbodies only making up a small proportion (approximately 0.04%, covering an area of 0.33 ha). As a result, the land within the Order Limits is considered unlikely to support significant populations of aquatic invertebrates such as dragonflies and caddisflies, which may be affected through this impact pathway. Furthermore, significant buffers between all waterbodies and the proposed solar panel arrays have been implemented across the Scheme, comprising a minimum non-developable area of 10m from any ponds, and a minimum of between 8m from any ditches, streams and rivers. These offsets are anticipated to significantly reduce the potential for this impact pathway to result in significant effects on aquatic invertebrates. **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]** has been revised to include a separate section for Aquatic Invertebrates and additional text relating to macrophytes, which assesses this potential impact pathway. The revised Chapter has been submitted at Deadline 1.

EA-021	Ecology and Biodiversity	Fisheries, Biodiversity and Geomorphology	Document Reference(s): APP-061 Chapter 9 Ecology and Biodiversity, APP-283 Outline Landscape and Environmental Management Plan (OLEMP), APP-277 Outline Construction Environmental Management Plan (OCEMP) Issue: Watercourse buffers quoted are inconsistent: a 10-15m buffer is quoted in Chapter 9 whereas up to 30m for 'major watercourses' is quoted in the OLEMP and 8m watercourse buffer is proposed in the OCEMP. Impact: Unclear what buffers are being proposed, so we are unable to advise on suitability. Certain watercourses may need a wider buffer due to ecological sensitivity. Solution: Confirm approach to riparian buffers. Wider buffers for more ecologically sensitive watercourses are supported and should be included in the commitments register. Riparian tree planting is welcomed for ecological and climate adaptation benefits it can bring.	The Applicant notes the comment and confirms that a minimum buffer of 8 m from ditches and watercourses is secured as part of the flood risk, drainage and construction controls set out in **Outline Construction Environmental Management Plan [APP-277]** and assessed in **ES, Volume 1, Chapter 11 Hydrology, Flood Risk and Drainage [APP-063]**, with wider buffers applied where required to address ecological sensitivities identified through survey and assessment in **ES, Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**. Accordingly, the approach to buffers as set out at Table 5 of the **Outline Landscape and Ecological management Plan [APP-283]** is as follows: • A minimum 8 m buffer from any ditch or watercourse, applied for flood risk, drainage and construction control purposes. • A minimum 10 m buffer from ditches with evidence of water voles. • A minimum 15 m buffer from minor watercourses where ecological value or sensitivity requires an enhanced buffer. • A minimum 50 m buffer from ponds with confirmed great crested newt presence, or where presence is assumed on a precautionary basis due to inconclusive results.

				This layered approach ensures that baseline hydrology and drainage protections are secured, with ecology-led enhancements applied where appropriate. No amendments to the application documents are required.

EA-022	Ecology and Biodiversity	Groundwater and Contaminated Land	Document Reference (s): APP-012 Plan 2.8 Waterbodies in a River Basin Management Plan Issue: Groundwater Water Framework Directive (WFD) issues have not been appropriately assessed. The Plan shows only surface water bodies within a River Basin Management Plan. No equivalent figure showing WFD Groundwater bodies is provided. Impact: Sensitive groundwater receptors are not well defined. Solution: Produce a figure showing the Proposed Development site in the context of WFD Groundwater bodies. Additonal Narrative / explanation: There are multiple WFD Groundwater bodies present within the Study Area. The Indicative Order Limits area lies within: • South of Malmesbury (Water body ID GB40901G806000) • Bristol Avon Forest Marble (Water body ID GB40902G302900) • Bath Oolite (Water body ID GB40901G805500) This information is provided within the Water Framework Assessment (APP-276 Figure 5 and Section 5.1). However, it should also be clearly conveyed within the main Environmental Statement.	From a hydrology and WFD perspective, WFD groundwater bodies are identified in **Water Framework Directive Assessment [APP-276]**, and Plan 2.8 provides surface water body context only. To improve clarity, the Applicant will provide a plan showing the Proposed Development in the context of WFD groundwater bodies, and will add proportionate signposting within **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [APP-063]** to direct readers to the groundwater body context in **Water Framework Directive Assessment [APP-276]**.

EA-023	Ground Conditions	Groundwater and Contaminated Land	Document Reference (s): APP-055 Chapter 3 The Scheme Table 3-1 Design Parameters, APP-071 Chapter 19 Ground Conditions Sections 19.11.4 and 19.11.7 Issue: Current piling proposals increase risks of contamination, Proposed piling depths extend to a maximum depth of 12 metres below ground level. Impact: Potential for piled foundations to introduce new contaminant migration pathways and/or between hydraulically separate groundwater bodies. Solution: Consider whether shallower foundation solutions can be sufficient for the Proposed Development. A Foundation Works Risk Assessment should be produced for all piled and deep foundation works. The Applicant should ensure consistency regarding stated maximum excavation and piling depths. Piling risk assessment and pile design must consider sensitive receptors including confined Source Protection Zones (SPZs) and deeper geology (Principal aquifers) in addition to shallow SPZs and Secondary A aquifers. Additional Narrative/ explanation Proposed foundation depths were not provided for the substation and BESS developments in the PEIR submission (Chapter 3 Table 3-1). Appendix 1-2 Scoping Opinion Response Table states that “The foundations for all elements of the Scheme will be shallow in nature and do not represent a potential pathway for surface contaminants to	The assessment of ground conditions, including risks associated with contamination and groundwater, is provided in **ES Volume 1, Chapter 19: Ground Conditions [APP-071]**, with supporting desk studies provided in **ES Volume 3, Appendices 19 1 to 19 9 [APP-247 to APP-255]**. Chapter 19 identifies that piled foundations have the potential to create contaminant pathways and confirms that appropriate controls are required to manage this risk. A requirement to undertake a Piling Risk Assessment prior to construction is secured through the **Outline Construction Environmental Management Plan (CEMP) [APP-277]**. The Piling Risk Assessment will assess the risks posed by piling and other penetrative ground improvement methods, in line with the CL:AIRE guidance Piling and Penetrative Ground Improvement Methods on Land Affected by Contamination: Guidance on Pollution Prevention, and will consider sensitive receptors including groundwater and Source Protection Zones, where relevant. In addition, a **BESS and Substation - Geotechnical Risk Register [Ref. TBC]** will be developed in relation to piling works to identify any specific risks that may exist in locations where piling occurs at greater depths and to inform how those risks will be managed prior to construction. Where required, this may include consideration of alternative foundation solutions or pile design to

			deeper groundwater." The proposed foundation depths outlined within Chapter 3 Table 3-1 do not align with this. We consider that deep and piled foundations represent a potential pathway for surface waters to impact deeper groundwater. Foundation details for the BESS compound are minimal. Table 3-1 states a maximum foundation depth of 4m. However, no further information is given on foundation design unlike that given for the Substation developments within the same table. Appendix 3-1 however states in Section 1.2.11, "The foundations would most likely be a concrete piled foundation. Depending on type of soil and presence of clay. Foundation depth can vary up to 4 m. The final depth of the foundations will be determined by site investigations." Chapter 19 section 19.11.4 states that "…the limited foundations (to a maximum of 4m depth...) required for BESS Area and substation facilities." Section 19.11.7 then contradicts this statement by stating that piled foundations at substations may extend up to 12m. We note that Chapter 19 Section 19.10.2 states that the requirement to undertake piling risk assessment prior to construction is secured in the Outline CEMP. The Preliminary Risk Assessment for Lime Down C (Appendix 19-3) states in Table 4 that "The Cornbrash Formation … is typically 2-4 m thick in Wiltshire and	reduce potential impacts on soils and groundwater. With regard to piling depths, the Applicant confirms that the maximum depth of piling considered within the assessment is 12 m. This represents a reasonable worst case scenario and reflects an improved understanding of ground conditions since scoping. The final piling depths will be confirmed as part of the detailed design process, informed by site investigation and secured through the detailed CEMP approval process. The controls set out within the **Outline CEMP [APP-277]** are secured by a requirement in Schedule 2 of the **Draft Development Consent Order [APP-016]**, which requires a detailed CEMP to be submitted to and approved by the relevant planning authority prior to construction, to be substantially in accordance with the **Outline CEMP [APP-277],** and for construction works to be carried out in accordance with the approved CEMP.

			overlies the Forest Marble Formation". This is within the maximum foundation depths stated for the Substation developments and may be within the maximum foundation depth of the BESS and Solar PV panel array foundation structures. An item in the Commitments Register for Ground Conditions and Contamination states "Foundations associated with structures will be designed to minimise impact on soils and groundwater. The foundation depth would depend on the encountered ground conditions and anticipated uplift pressures. Specialist foundation options may be required if archaeological protection is required." Where impacts on groundwater from foundation construction are anticipated to occur, these should be subject to a Foundation Works Risk Assessment.	

EA-024	Hydrology, Flood Risk and Drainage	Groundwater and Contaminated Land	Document Reference (s): APP-182 Appendix 3-1 Section 1.2.11 Issue: It is unclear how the Battery Energy Storage System (BESS) foundation solution as presented would interact with the proposed sealed drainage solution. Impact: If the design is inadequate, the drainage system could be compromised by the foundation solution. Solution: The Applicant should provide more information on the proposed drainage system, including how this will interact with foundation structures. Additional Narrative / explanation: We are concerned that the foundation solution could penetrate the impermeable lined drainage system, thus compromising the containment of pollutants from operational spills and leaks and those resulting from a fire event. The location of the proposed BESS and adjacent 400kV substation in Lime Down D overlies a groundwater Source Protection Zone (SPZ) 2c, the 'c' suffix signifying the presence of a confined aquifer. The Eastern proposed 132kV Substation site is located within Zone 1c, and the Western proposed 132kV Substation site is loved within SPZ2c and SPZ3 (unconfined). Depending on the thickness and composition of the overlying confining strata, piled foundations for the BESS and	The assessment of ground conditions, including risks associated with contamination and groundwater, is provided in **ES Volume 1, Chapter 19: Ground Conditions [APP-071]**, with supporting desk studies provided in **ES Volume 3, Appendices 19 1 to 19 9 [APP-247 to APP-255]**. Chapter 19 identifies that piled foundations have the potential to create contaminant pathways and confirms that appropriate controls are required to manage this risk. A requirement to undertake a Piling Risk Assessment prior to construction is secured through the **Outline Construction Environmental Management Plan [APP-277]**. The Piling Risk Assessment will assess the risks posed by piling and other penetrative ground improvement methods, in line with the CL:AIRE guidance Piling and Penetrative Ground Improvement Methods on Land Affected by Contamination: Guidance on Pollution Prevention, and will consider sensitive receptors including groundwater and Source Protection Zones, where relevant. In addition, a risk register will be developed in relation to piling works to identify any specific risks that may exist in locations where piling occurs at greater depths and to inform how those risks will be managed prior to construction. Where required, this may include consideration of alternative foundation solutions or pile design to reduce potential impacts on soils and groundwater.

			Substations could penetrate into the confined aquifer and create a new contaminant migration pathway.	With regard to piling depths, the Applicant confirms that the maximum depth of piling considered within the assessment is 12 m. This represents a reasonable worst case scenario and reflects an improved understanding of ground conditions since scoping. The final piling depths will be confirmed as part of the detailed design process, informed by site investigation and secured through the CEMP approval process. The controls set out within the **Outline CEMP [APP-277]** are secured by a requirement in Schedule 2 of the **Draft Development Consent Order [APP-016]**, which requires a detailed CEMP to be submitted to and approved by the relevant planning authority prior to construction, to be substantially in accordance with the **Outline CEMP [APP-277],** and for construction works to be carried out in accordance with the approved CEMP. In relation to Appendix 3-1 Section 1.2.11, the Applicant agrees with the principle of the Environment Agency's comment. The BESS and substation compounds will be delivered with a sealed, isolatable drainage and containment approach so that operational spillages, leaks and any firefighting water are contained and managed without creating pollutant pathways to ground or groundwater. The detailed foundation design and the detailed drainage/containment design will be developed together to ensure the drainage containment performance is not

				compromised by any foundation elements. Where foundations are penetrative, the final design will ensure that the containment system remains effective and continuous, and that no preferential pathway is created to underlying strata, including within Source Protection Zones. A standalone drainage strategy plan for the BESS and substations is being prepared for Deadline 2 to clearly set out these committed drainage principles and the design interface requirements (including segregation, isolation and containment performance) and the relevant application documents will signpost to that plan for clarity. This will not alter the assessment conclusions.

EA-025	Hydrology, Flood Risk and Drainage	Groundwater and Contaminated Land	Document Reference (s): APP-055 Chapter 3 The Scheme Section 3.5.22, APP-286 7.21 Outline Battery Safety Management Plan, APP-063 Chapter 11 Hydrology, Flood Risk and Drainage Section 11.10.60 Issue: The detail of fire water supply and storage within the Outline Battery Safety Management Plan (oBSMP) is lacking. Impact: Lack of clarity over proposed firefighting water supply source, storage and management proposals means we are unable to check if there are adequate environmental protections in place. Solution: Further details of fire water supply and storage are needed, in particular for separate fire suppression and boundary cooling supply systems. The source of water to be used for firefighting purposes should be identified. Additional Narrative/ explanation Outline details on separate sources of firefighting water for internal fire suppression systems (if to be utilised) and for boundary cooling are provided in Section 4.1.22. However, it is unclear how the potential requirement for separate sources of water for fire suppression systems and for use by Dorset and Wiltshire Fire and Rescue Service (D&WFRS) are to be addressed. The Applicant should clearly state the source of water to be used for firefighting	The Applicant's **Outline Battery Safety Management Plan (OBSMP) [APP-286]** covers all requisite water supply and storage details, namely: • The BESS Area will be designed to integrate firefighting designed to integrate pressure fed (pump driven) fire hydrants fed from water tanks. Hydrants will be located in consultation with D&WFRS to provide redundancy and safe operating distances for firefighters. • The BESS Area will contain a minimum of two firefighting water storage tanks (the tanks will contain potable water) of no less than 228,000 litres in capacity, capable of delivering 1900 litres per minute for 4 hours (exceeding NFCC guidance). • Water storage will either be in sectional panel tanks, or cylindrical tanks, above or below ground. Where above ground, tanks will be supported on structural concrete slab foundations to a maximum depth of 1m. • If an internal BESS water based fixed suppression system (automatic or dry pipe) is integrated in the BESS enclosures a separate water supply and water containment system will be integrated, water runoff is likely to contain higher levels of pollutants compared to water used for external boundary

			purposes.	cooling of BESS and ESS equipment. • If a BESS enclosure design does not integrate automatic fire suppression systems and a dry pipe sprinkler or spray system is integrated, then NFCC (2026) revised guidance will be followed. Connections to any dry pipe systems that are required to be installed on the BESS Area will be installed in accordance with BS 9990 Non-automatic firefighting systems in buildings code of practice (Current Edition) and will be identified in accordance with BS 3251 Indicator Plates for Fire Hydrants (Current Edition). If a dry pipe system is integrated for the scheme, D&WFRS instantaneous connection points will be located at a safe distance from enclosures and clearly signed for D&WFRS response, in accordance with NFCC guidelines. Water supply for this type of system will be separate from the water supply designated for D&WFRS boundary cooling requirements. Details of any internal fire suppression system will not be known until the detailed design stage when a BESS system is selected by the Applicant. • NFCC (2026) revised guidance acknowledges that it is increasingly common for BESS enclosures to be designed

				without integrated automatic fire suppression systems because high levels of thermal insulation are integrated which allows enclosures to be closely spaced whilst preventing propagation of fire to adjacent BESS. LSFT or full-scale destruction testing and rigorous site-specific consequence modelling will have been conducted to demonstrate that loss will be safely limited to one container without the intervention of D&WFRS. • The firefighting water requirement will be fully assessed at the detailed design stage based upon BESS fire and explosion test data by an independent Fire Protection Engineer and water storage volumes will be agreed with D&WFRS during detailed design. The Applicant will have agreed contracts for potable firefighting water to be brought to site, maintenance and testing requirements will conform to requisite British standards.

EA-026	Construction and Decommissioning	Groundwater and Contaminated Land	Document Reference (s): APP-055 Chapter 3 The Scheme Section 3.6.3 Issue: It is unclear what below ground infrastructure will be left in-situ following the decommissioning phase. Impact: Lack of clarity over decommissioning proposals undermines the Environmental impact assessment process. Solution: The Applicant should clarify the piled foundations decommissioning proposals. Additional Narrative/ explanation The Applicant states under decommissioning that “Any piles would be removed”. This contradicts the preceding statement that “foundations and other below ground infrastructure will be cut to 1.2m below the surface to enable future ploughing”. The statement currently indicates that all piled foundations, including those at Substation and BESS sites in addition to PV panel arrays, would be removed fully.	**ES Volume 1, Chapter 3: The Scheme [APP-055]** paragraph 3.6.3 should read *'Any piles would be removed to 1.2m or otherwise decommissioned in line with best practice'*. As this are minor error and the correct text quoted here has been assessed in the Environmental Statement the Applicant does not propose to update and resubmit Chapter 3: The Scheme. However, should any substantive amendments be required to this document at a later stage, the Applicant will correct the error in Chapter 3: The Scheme at that time. The **Outline Decommissioning Strategy [APP-279]** will be updated to reflect this text.

EA-027	Hydrology, Flood Risk and Drainage	Groundwater and Contaminated Land	Document Reference (s): APP-063 Chapter 11 Hydrology, Flood Risk and Drainage Table 11-1, ID 3.5.4 Issue: The available data suggests that groundwater is likely to be encountered at least at trenchless cable crossings, and possibly even open trenching depths locally. Given the limited coverage of the currently available exploratory hole records and monitoring data, there's uncertainty around the likely ranges of shallow groundwater. Impact: Inadequate mitigation against groundwater pollution and dewatering impacts for cable installation. As risks are not appropriately understood. Solution: The Applicant should review their conceptual groundwater model vs the proposed scope of works and identify suitable mitigation where groundwater may be encountered. Additional Narrative/ explanation In the absence of adequate ground investigation and groundwater monitoring data, the statements made in ID 3.5.4 Response are inadequately supported. Each Preliminary Risk Assessment provided in support of the Environmental Statement (Appendices 19-1 to 19-5) refer to the potential for shallow perched groundwater. Lack of groundwater assessment means that it is not possible to say that cables will not intercept groundwater and that trenchless	An assessment of ground conditions, including groundwater, is provided in **ES Volume 1, Chapter 19: Ground Conditions [APP-071]**, supported by the Preliminary Risk Assessments for each element of the Scheme contained in **ES Volume 3, Appendices 19 -1 to 19 -9 [APP-247 to APP-255]**. These documents identify the potential for shallow and perched groundwater within parts of the Site and Cable Route Corridor. Separate **BESS and Substation - Geotechnical Risk Register Cable Route** and **Avoidance Areas - Geotechnical Risk Register [Doc REF tbc]** will be developed to identify location specific risks where works may occur at greater depths, including the potential to encounter groundwater. This process will inform appropriate management measures prior to construction and may include, where necessary, alternative cable installation techniques or construction methodologies to manage groundwater risks. Where necessary, the assessments contained within Appendices 19-1 to 19-9 will be reviewed and revised, based on the content of the risk register at that specified location. Further ground investigation and verification of ground conditions prior to construction is secured through the **Outline Construction Environmental Management Plan (CEMP) [APP-277]**. The **Outline CEMP [APP-277]** provides the mechanism through which risks associated with groundwater encounter,

			techniques such as Horizontal Directional Drilling will avoid groundwater strike. Furthermore, Section 1.4.8 of Appendix 19-6 references a borehole with standing water reported at 1.8 mbgl, Chapter 19 Section 19.8.12 refers to water having been observed at 4.5 mbgl, and a brief review of BGS borehole logs ST87NE41, ST87SE40 and ST86NE23 has shown reported water strikes at 1.8 mbgl and 4.5 mbgl. Although where groundwater has been encountered at 4.5 mbgl it is unlikely that shallow cable trenching excavations would encounter groundwater, it is likely that HDD works could extend to this depth. It is unclear how the HDD design would be controlled to avoid groundwater strikes.	dewatering and pollution during construction activities will be identified and managed before works commence. The **Outline CEMP [APP-277]** is secured by a requirement in Schedule 2 of the **Draft Development Consent Order [APP-016]**, which requires a detailed CEMP to be submitted to and approved by the relevant planning authority prior to construction, to be substantially in accordance with the Outline CEMP, and for construction works to be carried out in accordance with the approved CEMP.

EA-028	Hydrology, Flood Risk and Drainage	Groundwater and Contaminated Land	Document/ Reference (s) APP-063 Chapter 11 Hydrology, Flood Risk and Drainage Table 11-1, ID 3.5.11 Issue: There is no clear confirmation that per-and poly fluoroalkyl substances (PFAS) based materials will not be present in above and below ground cabling. Impact: Potential for PFAS to be present associated with non-construction material aspects of the Proposed Development. Resulting in contamination. Solution: Address other aspects of the Proposed Development where the use of PFAS compounds may occur.	The Applicant acknowledges the Environment Agency's concerns regarding the potential presence of per- and polyfluoroalkyl substances (PFAS) in underground cabling and provides the following clarification. The Applicant can confirm that the underground cables will utilise standard cross-linked polyethylene (XLPE) insulation. XLPE is typically not a fluorinated polymer, unlike materials such as PTFE or FEP, and pure XLPE insulation therefore does not inherently contain PFAS. However, it remains the case that ancillary components or certain manufacturing steps associated with cable production may involve PFAS. These could include tapes, lubricants, semi-conductive layers, or external jackets where PFAS-free alternatives are not universally available. While the Applicant will avoid the use of PFAS in ancillary components where a technically feasible and reasonable alternative exists, it is not possible to guarantee that all cabling materials and associated components will be entirely PFAS-free across the scheme. This is not unique to the Scheme and is typical of any project that involves the use of similar cabling materials. As outlined in the submitted **Outline Decommissioning Strategy [APP-279]**, flexibility has been maintained regarding the decommissioning approach. Current industry guidance and good practice

				indicate that the most environmentally acceptable option is typically to leave buried cables in situ at the end of their operational life, as this approach avoids soil disturbance and associated ecological or hydrological impacts when the cables are removed. Nonetheless, the Applicant recognises that environmental policy and good practice evolve over time. Should future guidance or policy indicate that removal of cables or ducting is more appropriate, this remains technically feasible. At the point of decommissioning, the Applicant will undertake an assessment to determine the most appropriate approach, balancing the environmental effects of cable removal against those associated with retention in situ. This assessment will take account of contemporary government policy, emerging PFAS-related guidance, advances in decommissioning technology, and site-specific environmental considerations. The final approach will be secured through a Decommissioning Environmental Management Plan (DEMP), which will be prepared and agreed with the relevant local authority prior to the commencement of decommissioning.

EA-029	Hydrology, Flood Risk and Drainage	Groundwater and Contaminated Land	Document/ Reference (s) APP-063 Chapter 11 Hydrology, Flood Risk and Drainage, Table 11-1 ID 3.5.13, APP-256 Appendix 19-10 Issue: Information on licensed groundwater abstractions relative to the Proposed Development does not match our records. Impact: The Applicant has not assessed impacts on groundwater abstractions within potential influencing distance of the site. Solution: Reassess the presence of, and risks to, groundwater abstractions which may be impacted by the proposal. Additional Narrative/ explanation The report states that the closest abstraction point is located approximately 896m west of the Cable Link E-Rail. Our records show a potable water groundwater abstraction licence within 50m of the proposed cable route north of Whitley, which has a corresponding Source Protection Zone 1 extending across a portion of the cable route. There is another licensed abstraction located approximately 550m west of the cable route, north of Yatton Keynell. Any infrastructure situated within a groundwater Source Protection Zone is within the catchment area of an abstraction regardless of the distance	The Applicant has made a formal request to the Environment Agency to review the groundwater abstraction records referenced in the representation. An updated version of **ES Volume 1, Chapter 19: Ground Conditions [APP-071]** and **ES Volume 3, Appendix 19 10 [APP-256]** has been submitted into the Examination at Deadline 1, incorporating the groundwater abstraction data referenced by the Environment Agency. The Applicant confirms that the inclusion of this additional abstraction information does not result in any material change to the assessment findings or conclusions reported in **ES Volume 1, Chapter 19: Ground Conditions [APP-071]**. The assessment continues to conclude that, with the identified mitigation and good construction practice measures in place, the Scheme would not give rise to significant adverse effects on groundwater resources, licensed abstractions or private water supplies. Mitigation measures to protect groundwater are identified within the **Outline Construction Environmental Management Plan (CEMP) [APP-277],** which provides the framework for managing risks to groundwater and water supplies during construction, including procedures to prevent pollution and manage unexpected ground conditions.

			from that abstraction point. Almost the entire Proposed Development boundary lies within groundwater Source Protection Zone 2 (Outer Catchment) and 3 (Total Catchment) associated with various abstraction boreholes. The North-Eastern part of the site also within Zone 1 (Inner Catchment) of an SPZ. Appendix 19-10 states that a Council Private Water Supply (PWS) enquiry with the Local Authority found no private water supplies within the submitted red line boundary. The Applicant should confirm that the submitted red line boundary is identical to the Indicative Scoping Boundary submitted for the Environmental Statement. Three PWS abstractions are identified within 100m of the red line boundary (National Grid References 386797 Easting 183163 Northing, 387185 Easting 183558 Northing and 387053 Easting 184622 Northing).	

EA-030	Ground Conditions	Groundwater and Contaminated Land	Document / Reference(s) APP-071 Chapter 19 Ground Conditions Table 19-3 Issue: No assessment of the thermal implications of cables on sensitive groundwater receptors. Impact: Buried high voltage cables could impact sensitive groundwater receptors if not adequately assessed and mitigated where necessary. Solution: Consider thermal impacts from cables on groundwater receptors. Additional Narrative/ explanation This was raised at PEIR stage and although included in Table 19-3, has not been responded to.	The baseline assessment in relation to thermal pollution has been reviewed and **ES Volume 1, Chapter 19: Ground Conditions [APP-071]** updated accordingly. There is no change to the outcomes of the assessments included within the Chapter.

EA-031	Hydrology, Flood Risk and Drainage	Groundwater and Contaminated Land	Document / Reference(s) APP-063 Chapter 11 Hydrology, Flood Risk and Drainage, Table 11-9, APP- 286 7.21 Outline Battery Safety Management Plan Issue: The Battery Energy Storage System (BESS) Area drainage outfall is proposed to incorporate automatically self-actuating valves. Impact: Potential for automatic self-actuating valves to fail in the event of a fire. Solution: Confirm the proposed maintenance schedule to ensure these valves remain operable and ensure that backup manual operation is available. The Outline Battery Safety Management Plan (OBSMP) and Outline Operational Environmental Management Plan should include a clear schedule of inspection and maintenance operations including self-actuating valves, oil water interceptors and other aspects of the BESS and Substation drainage systems. Additional Narrative/ explanation We are aware that automatic penstock valves can be prone to seize up if not operated for extended periods of time. The Applicant should ensure that any such valves are inspected and maintained on a regular basis to ensure they remain effective.	The Applicant agrees that drainage isolation measures at the BESS, including any self actuating valves or penstocks and oil water interceptors, must remain operable for the lifetime of the Scheme and that manual backup operation must be available where appropriate. The Applicant will update **Outline Battery Safety Management Plan [APP-286]** to include an explicit inspection, maintenance and periodic functional testing schedule for relevant BESS drainage components, including provision for manual operation where required. The **Outline OEMP [APP-278]** will also be updated to reflect the position set out within the **Outline BSMP [APP-286].**

EA-032	Ground Conditions	Groundwater and Contaminated Land	Document / Reference(s) APP-071 Chapter 19 Ground Conditions Table Issue: The Applicant states that the upper geology present on the Proposed Development site is heavily weathered and cohesive. Ground conditions have not been verified through intrusive investigation and updates to the Preliminary Risk Assessments presented as supporting documentation. No infiltration testing has been carried out to date. Impact: The majority of the site overlies geological strata designated as Secondary A aquifer. The majority of which has groundwater Source Protection Zone status, either confined or unconfined. Solution: In the absence of confirmation from ground investigation on the site, the Applicant should take a precautionary approach regarding the likelihood of the presence of extensive weathered cohesive deposits. Throughout the anticipated extent of construction activities such as piling, foundation construction, trenching and HDD. Additional Narrative/ explanation At PEIR stage we noted that no soil infiltration testing had been carried out at the site, which is not acknowledged in the Environmental Statement. We are aware of consented discharges to soakaway within this region, which are identified in	Based on the information available at the time of production of **ES Volume 1, Chapter 19: Ground Conditions [APP-071],** and the supporting Preliminary Risk Assessments for each element of the Scheme contained in **ES Volume 3, Appendices 19 1 to 19 9 [APP-247 to APP-255]**, it is assumed that cohesive deposits are present across the majority of the scheme, providing a low permeability layer above sensitive groundwater resources. The presence of such deposits will be proved through ground investigation prior to the construction of the scheme. A requirement for a Piling Risk Assessment is secured through the **Outline Construction Environmental Management Plan (CEMP) [APP-277].** The Piling Risk Assessment will assess risks posed by piling and other penetrative ground improvement methods in line with the CL:AIRE guidance Piling and Penetrative Ground Improvement Methods on Land Affected by Contamination: Guidance on Pollution Prevention, taking account of groundwater sensitivity and aquifer designation. In addition, a risk register will be developed in relation to piling and HDD works to identify location specific risks where activities may occur at greater depths and to inform how those risks will be managed prior to construction. Where required, mitigation may include alternative foundation solutions, pile design or cable installation techniques to

			Sections 19.7.6 and 19.7.10.	reduce potential impacts on soils and groundwater.

EA-033	Ground Conditions	Groundwater and Contaminated Land	Document / Reference(s) APP-071 Chapter 19 Ground Conditions Table 19-1, ID 3.6.2, Volume 1, Sections 19.10.2 and 19.12.2, APP-291 Commitments Register: Ground Conditions and Contamination item Issue: The adoption of a Discovery and Inspection Strategy should not act as a substitute for effective prior investigation and characterisation of land contamination risks. Any legal obligations relating to management of known land contamination must be followed. Impact: Potential to knowingly permit a 'groundwater activity' without appropriate authorisation or exemption. Risk is posed to human health including groundworkers and the wider environment. Solution: Demonstrate a proactive approach to identifying and managing potential sources of contamination, with the use of a Discovery and Inspection Strategy to be employed for unexpected contamination where encountered outside such areas. Choosing to remediate a grossly contaminated site could be used as an opportunity for positive impact from the Scheme. The Applicant should be able to demonstrate that contamination does not pose significant possibility of significant harm or significant possibility of significant pollution of controlled waters in accordance with Paragraph 189 of the National Planning Policy Framework.	Ground investigation prior to construction is secured through the **Outline Construction Environmental Management Plan (CEMP) [APP-277].** This ensures that ground conditions are appropriately verified before construction activities commence and that any risks associated with contamination are identified and managed. A Discovery and Inspection Strategy is also secured through the **Outline CEMP [APP-277**] and will be applicable to the entire Scheme. The Strategy provides a mechanism for identifying and managing unexpected contamination encountered during construction activities, ensuring that appropriate measures are implemented where required. The measures set out within the **Outline CEMP [APP-277]** are secured by a requirement in Schedule 2 of the **Draft Development Consent Order [APP-016],** which requires a detailed CEMP to be submitted to and approved by the relevant planning authority prior to construction, to be substantially in accordance with the **Outline CEMP [APP-277],** and for construction works to be carried out in accordance with the approved CEMP.

			Additional Narrative/ explanation The Discovery and Inspection Strategy should be applied to the entire Proposed Development. The Applicant should confirm what actions are proposed should contamination be identified within the Proposed Development that would not be disturbed by the proposed works. Remediation of land and groundwater contamination is an opportunity for environmental betterment from the Scheme, even where the disturbance of such material is avoidable from a design standpoint. Note that the removal of contaminated material may not always be the most appropriate outcome compared with other remediation technologies such as in-situ or ex-situ treatment.	

EA-034	Ground Conditions	Groundwater and Contaminated Land	Document / Reference(s) APP-071 Chapter 19 Ground Conditions Table 19-3 Issue: Inconsistency in the walkover surveys carried out. Impact: Lack of clarity about what surveys have been carried out, and which areas are covered. Visual and olfactory evidence of contamination and contamination sources may be missed. Solution: The Applicant should ensure that it is clear which areas have been subject to walkover survey and on which dates. Additional Narrative/ explanation Appendix 19-1 Table 4 states that a site walkover was carried out by Delta Simons on 31 January 2024. However Section 1.2.16 of the same Appendix states that "A site walkover of Lime Down A was carried out between 1st and 2nd May 2025. The accompanying photo log includes photographs dated 1st and 2nd May 2025 taken by Geosyntec. Appendix 19-2 Table 4 states that a site walkover was carried out by Geosyntec on 1st and 2nd May 2025, which the appended photo log also shows. Appendix 19-3 Table 4 states that a site walkover was carried out by Geosyntec on 1st and 2nd May 2024, whereas the appended photo log shows dates of 1st and 2nd May 2025. Appendix 19-4 Table 4 states that a site walkover was carried out by Delta Simons on 31st January 2024. Section 1.2.16 then states that a walkover was carried	An updated version of **ES Volume 1, Chapter 19: Ground Conditions [APP-071]** and the associated **Preliminary Risk Assessments [APP-247 to APP-255]** has been submitted into the Examination at Deadline 1. These updates clarify the areas covered by walkover surveys and the dates on which they were undertaken, addressing the inconsistencies identified and ensuring a clear and consistent presentation of the baseline information. The Applicant confirms that the clarification of walkover survey details does not result in any material change to the findings or conclusions of the assessment reported in **ES Volume 1, Chapter 19: Ground Conditions [APP-071].** The assessment continues to conclude that, with the identified mitigation and good construction practice measures in place, the Scheme would not give rise to significant risks to human health or controlled waters from land contamination.

			out between 1st and 2nd May 2025. The appended photo log indicates that Geosyntec carried out a walkover on 7th May 2025. Appendix 19-5 Table 4 states that a site walkover was carried out by Delta Simons on 31st January 2024. Section 1.2.17 then states that a walkover was carried out between 1st and 2nd May 2025. The appended photo log indicates that Geosyntec carried out a walkover on 6th May 2025.	

EA-035	Ground Conditions	Groundwater and Contaminated Land	Document / Reference(s) : APP-071 Chapter 19 Ground Conditions Section 19.11.12 , APP-291 Commitments Register: Ground Conditions and Contamination Issue: The Applicant has underestimated risks to ground water - stating that soil contamination would not pose a risk during the operational phase. Impact: Soil contamination could be encountered during the operational phase. Solution: A Discovery and Inspection Strategy should be in place for excavation activities during the operational phase. Additional Narrative/ explanation New contamination could migrate onto the Proposed Development site from offsite sources, or excavation could take place in areas not previously accessed, for example for cable re-routing, which could encounter previously unidentified contamination. This was raised as a concern at PEIR stage as item GWCL18 – Contamination.	A Discovery and Inspection Strategy, together with further ground investigation prior to construction, is secured through the **Outline Construction Environmental Management Plan (CEMP) [APP-277].** This provides the mechanism for identifying and managing any unexpected contamination encountered during construction activities. The Applicant confirms that soil excavation is not anticipated to be required during the operational phase of the Scheme. Notwithstanding this, an updated version of **ES Volume 1, Chapter 19: Ground Conditions [APP-071]** and the **Outline Operational Environmental Management Plan (OEMP) [APP-278]** has been submitted into the Examination at Deadline 1, which includes provision for a Discovery and Inspection Strategy to apply during the operational phase should excavation be required unexpectedly. The **Outline CEMP [APP-277]** and **Outline OEMP [APP-278]** are secured by a requirement in Schedule 2 of the **Draft Development Consent Order [APP-016]**, which requires the relevant management plans to be submitted to and approved by the relevant planning authority, to be substantially in accordance with the outline versions, and for the Scheme to be implemented in accordance with the approved plans.

EA-036	Ground Conditions	Groundwater and Contaminated Land	Document / Reference(s): APP-071 Chapter 19 Ground Conditions Section 19.12.4 Issue: Groundwater risks have not been appropriately assessed. Impact: Potential for historic contamination sources to be overlooked and insufficiently characterised. The Applicant states that ground investigation will be carried out in the vicinity of the 132kV and 400kV Substation sites to inform the Piling Risk Assessment required for piling design, “regardless of the possible presence of historic contamination or geohazards". Solution: In addition to geotechnical characterisation, intrusive investigations should also target any areas of potential historic contamination identified in the Preliminary Risk Assessment.	Ground investigation prior to the construction phase is secured through the **Outline Construction Environmental Management Plan (CEMP) [APP-277]**. The ground investigation will inform construction design and risk management, including the Piling Risk Assessment, and will be undertaken in accordance with the requirements of the approved CEMP. For clarity, the Applicant confirms that the ground investigation programme will target all areas of potential historic contamination identified through the Preliminary Risk Assessments, in addition to the geotechnical scope, to ensure risks to groundwater and human health are appropriately characterised and addressed. The **Outline CEMP [APP-277]** provides the framework for managing risks associated with ground conditions and groundwater during construction and ensures that potential contamination risks are appropriately identified and managed prior to works commencing. The measures set out in the **Outline CEMP [APP-277]** are secured by a requirement in Schedule 2 of the **Draft Development Consent Order [APP-016]**, which requires a detailed CEMP to be submitted to and approved by the relevant planning authority prior to construction, to be substantially in accordance with the **Outline CEMP [APP-277],** and for construction works to be carried out in accordance with the approved CEMP.

EA-037	Other Environmental Matters	Groundwater and Contaminated Land	Document / Reference(s): APP-055 Chapter 3 The Scheme Section 3.5.34, APP-072 Chapter 20 Other Environmental Matters Section 20.3.73 Issue: Storage and management proposals for batteries have not been provided. BESS batteries are anticipated to be replaced five times over the operational phase of the Proposed Development. Impact: End-of-life and damaged/faulty batteries may pose a risk of pollution of the water environment if managed and stored inappropriately. Solution: Provide details of storage and management proposals for damaged, faulty and end-of-life batteries, including management of associated fire propagation and pollutant spill/leak controls, to be secured via the outline Battery Safety Management Plan and oOEMP. Additional Narrative/ explanation The Applicant states “It is expected that the BESS Area could be replaced up to five times during the operation and maintenance phase.” We presume that this is a typo and should refer to the replacement of batteries rather than the structure of the BESS development itself. We note Chapter 20 (Waste) also references replacement of batteries at the same frequency. The Applicant should	As outlined in the **Outline Operational Environmental Management Plan [APP-286]** "*a Battery Safety Management Plan (BSMP) will be implemented throughout the scheme to ensure the safe design, production, use, transportation, storage, and disposal of batteries. This approach will minimise risks associated with batteries while complying with relevant standards*". An **Outline BSMP [APP-286]** has been prepared as part of the Application which sets out the mitigation measures to be secured via Requirement 6 (‘Battery Safety Management’) of the Draft DCO [APP-016]. The **Outline BSMP [APP-286]** sets out under the ‘End of life/disposal’ heading from Paragraph 4.3.17 to Paragraph 4.3.20: *“In the event of a defective battery module or cell being identified, the defective module shall be immediately placed out of service and be electrically disconnected from the system. A specific risk assessment shall be conducted prior to the removal of the defective module to ensure the safety of employees and contractors.* *Once a defective module is safely removed in accordance with the specific risk assessment, it shall be placed in an approved protective container prior to being transported from the detective unit to a dedicated safe location for inspection by an authorised manufacturer’s representative.*

			provide details of storage and management proposals for damaged, faulty and end-of-life batteries, including management of associated fire propagation and pollutant spill/leak controls. In the Scoping Report, the Applicant referred to the replacement of batteries taking place 'at least twice' during the operational phase. Although not an inaccurate statement this did infer a lower frequency of replacement than is currently indicated.	*All components replaced during the defects notification and warranty period will be taken back and recycled."* **ES Volume 1, Chapter 3: The Scheme [APP-055]** bullet 2 under paragraph 3.5.34 should read *'The BESS Container batteries could be replaced up to five times'*. As this are minor error and the correct text quoted here has been assessed in the Environmental Statement the Applicant does not propose to update and resubmit Chapter 3: The Scheme. However, should any substantive amendments be required to this document at a later stage, the Applicant will correct this error at that time. The same correction applies to **ES, Volume 1, Chapter 20: Other Environmental Matters (waste) [APP-072]**. It is proposed that this is only amended should other updates be made.

EA-038	Construction and Decommissioning	Groundwater and Contaminated Land	Document / Reference(s): APP-183 Appendix 3-2 Cable Route Construction Method Statement Section 1.8.2 Issue: Mitigation proposals managing risks to groundwater have not been adequately addressed. The Applicant specifies two products required to facilitate the drilling process: Bore-Gel (or similar) dry, powdered bentonite, and EZ Mud (or similar) liquid polymer. No environmental risk mitigation measures are currently provided in the Method Statement and the document does not reference the Drilling Fluid Breakout Plan. Impact: The Safety Data Sheets demonstrate that both substances pose a risk to controlled waters if not suitably managed. This may result in detrimental harm to the environment and protected species. Solution: Include reference to the proposed Drilling Fluid Breakout Plan, spill and leak management procedures. Provide a detailed explanation of the mitigation measures that will be taken to prevent contamination of controlled waters from occurring. Additional Narrative/ explanation No information regarding the drilling fluid/mud products is provided elsewhere in the Environmental Statement. This should also be incorporated into the Drilling Fluid Breakout Plan and outline	Mitigation measures for managing groundwater and surface water risks during trenchless drilling are already secured through the commitment to develop a breakout contingency procedure as set out in Table 5 of the **Outline Construction Environmental Management Plan (CEMP) [APP-277].** The preparation, approval and implementation of the detailed CEMP, substantially in accordance with the outline CEMP, is secured through requirement 13 in Schedule 2 of the **Draft Development Consent Order [APP-016]**. It is not considered necessary to update **Appendix 3-2: Cable Route Construction Method Statement [APP-183]** at this stage, as the mitigation relating to drilling fluid management is already secured through the **Outline CEMP [APP-277]** – supported by the relevant Environmental Statement (ES) chapters – and no additional mitigation has been proposed outside those documents or the **Outline CEMP [APP-277].** The exact drilling fluid products to be used will also be confirmed in the detailed CEMP, and Safety Data Sheets (SDSs) will be provided to the Environment Agency for approval prior to commencement of drilling works. Where feasible, the Applicant will seek to avoid the use of PFAS-containing bentonite, polymers, fuels, oils or other chemicals, and any proposed substitute products ('or similar') will be subject to review by the

			Construction Environmental Management Plan. The Safety Data Sheet (SDS) for both substances includes: “Environmental precautions - Prevent from entering sewers, waterways, or low areas,” and “Environmental Exposure Controls - Do not allow material to contaminate ground water system.” Ensure that any bentonite used for trenchless drilling, or elsewhere in the scheme, has not been treated with chemicals containing Per- and Polyfluoroalkyl Substances (PFAS). Fuel, oils and other chemicals, such as cleaning agents and decontaminants, should be PFAS-free, wherever possible. The named products are caveated with “or similar”. If the named products are not used but similar ones are selected, the Applicant should notify the Environment Agency and provide Safety Data Sheets so that we can check the suitability of the substitute products. Monitoring is required at all times during drilling activities.	Environment Agency through prior submission of SDSs. These commitments ensure that drilling fluids will be appropriately selected, controlled, and monitored, and that groundwater and ecological receptors will be protected throughout the construction phase.

EA-039		Groundwater and Contaminated Land	Document / Reference(s): APP-071 Chapter 19 Ground Conditions Appendices Issue: Contamination risks have not been adequality assessed. No Preliminary Risk Assessments (PRAs) for the interconnecting corridors between the main solar panel areas. These were provided at PEIR stage. Impact: Potential historic sources of contamination and sensitive receptors associated with the interconnecting cable corridors are not presented and discussed. Solution: Provide PRAs for the interconnecting cable corridors and assess risks and impacts according to the findings of the PRAs.	The Applicant confirms that the interconnecting cable corridors are included within the study areas assessed by the Preliminary Risk Assessments contained in **ES Volume 3, Appendices 19 1 to 19 9 [APP-247 to APP-255]**. Since the PEIR stage, the structure and layout of the PRAs has been refined, with the interconnecting cable corridors incorporated into the corresponding solar development area PRAs, rather than being presented as standalone appendices. Further clarity has been added to the Preliminary Risk Assessments to explain the coverage of the interconnecting cable corridors, and the updated versions of **ES Volume 3, Appendices 19 1 to 19 9 [APP-247 to APP-255]** have been submitted into the Examination at Deadline 1.
EA-040	Construction and Decommissioning	Groundwater and Contaminated Land	Document / Reference(s): APP-247 Appendix 19-1 Annexes 19-1-1 and 19-1-2 and Table 2, Appendix 19-2 Annexes 19-2-1 and 19-2-2 and Table 2, Appendix 19-3 Table 2, Appendix 19-4 Table 2, Appendix 19-5 Annexes 19-5-1 and 19-5-2 and Table 2, Appendix 19-6 Table 2, Appendix 19-7 Annexes 19-7-1 and 19-7-2 and Table 2 and Appendix 19-8 Table 2 Issue: Maps and data searches in appendices 19-1, 19-2 and 19-5 are not complete or specific to those sites (we previously raised this in our PEIR response).	As the Scheme has evolved, the study areas used for baseline desk studies and PRAs have been refined through the project lifecycle (including between the Scoping, PEIR and DCO Application stages) to reflect design development and to simplify how assessments are presented. As a result, differences in the presentation of study areas between the PEIR and the submitted Environmental Statement may be apparent. To address this, further clarity has been added to the Preliminary Risk Assessments contained in **ES Volume 3, Appendices 19 1 to 19 9 [APP-247 to APP-255]**, including clarification of the study area boundaries used for each PRA

			The PRA for Lime Down A (Annex 19-1), Lime Down B (Annex 19-2) and Lime Down E (Annex 19-5) do not clearly differentiate the PRA target Study Area boundary from the overall Study Area. The PRA study areas are also not clearly delineated in Table 2 for any of the PRA reports. The appended environmental setting reports state distances to 'offsite' features relative to the defined search polygon for that report. Therefore, applying those reports to a smaller land parcel makes it difficult to establish distances to on/offsite features relative to those land parcels unless they've been manually measured and updated by the Applicant in their PRA report. Impact: Any distances quoted in the report cannot be relied upon as they are not given in relation to the LD A and LD B site boundaries. This makes it difficult for us to cross check the conclusions of the report. Solution: Clearly identify the limits of each PRA Study Area and ensure that the PRA accurately represents the distances from the Study Area boundary to key features.	and how distances to relevant features should be interpreted in relation to those boundaries. The updated PRAs have been submitted to the Examination at Deadline 1.

EA-041	Construction and Decommissioning	Groundwater and Contaminated Land	Document / Reference(s): APP-247Appendix 19-1 Section 1.3.13, Appendix 19-2 Section 1.3.13, Appendix 19-3 Section 1.3.13, Appendix 19-4 Section 1.3.13, Appendix 19-5 Section 1.3.13, Appendix 19-6 Section 1.3.16, Appendix 19-7 Section 1.3.16 and Appendix 19-8 Section 1.3.15 Issue: The PRA reports do not refer to the proposed Discovery and Inspection Strategy. Impact: Contamination may not be appropriately managed. Solution: Investigate potentially contaminated areas as identified in the Preliminary Risk Assessments, and follow the Discovery and Inspection Strategy during all phases of the Proposed Development.	A Discovery and Inspection Strategy, together with ground investigation prior to the construction phase, is secured through the **Outline Construction Environmental Management Plan (CEMP) [APP-277]**. The Discovery and Inspection Strategy provides the mechanism for identifying and managing any unexpected contamination encountered during construction activities, including in areas identified within the PRAs. The measures set out within the **Outline CEMP [APP-277]** apply across the Scheme and ensure that contamination risks are appropriately managed during construction. These measures are secured by a requirement in Schedule 2 of the **Draft Development Consent Order [APP-016]**, which requires a detailed CEMP to be submitted to and approved by the relevant planning authority prior to construction, to be substantially in accordance with the **Outline CEMP [APP-277]**, and for construction works to be carried out in accordance with the approved CEMP.

EA-042	Ground Conditions	Groundwater and Contaminated Land	Document / Reference(s): APP-247Appendix 19-1 Section 1.4.11 Issue: The PRA concludes that subsurface migration of contamination within the Secondary A aquifer from the off-site vehicle repair garage lies outside the scope of assessment. There is no prior discussion of this feature in the context of the risk posed to the proposal. Impact: Potential for contamination impacts to groundwater from the identified off-site vehicle repair garage. Solution: The migration of contamination subsurface within the Secondary A aquifer should not be considered outside the scope of assessment. Additional Narrative/ explanation The garage is mentioned in Section 1.4.10 as a potential contamination source. However, this feature is not discussed or assessed in further detail prior to the PRA conclusions Section 1.4.11. Further justification for discounting this potential contamination source is required.	**ES Volume 3, Appendix 19 1 [APP-247]** has been reviewed, updated and resubmitted to the Examination at Deadline 1 to provide additional clarity regarding the identification and assessment of potential contamination sources, including the off site vehicle repair garage referenced in the representation. The updated PRA clarifies the basis on which potential contamination sources are considered within the assessment. The Applicant confirms that these clarifications do not result in any material change to the findings or conclusions of the assessment reported in **ES Volume 1, Chapter 19: Ground Conditions [APP-071]** with regard to groundwater risk.

EA-043	Ground Conditions	Groundwater and Contaminated Land	Document / Reference(s): APP-247 Appendix 19-1 Section 1.4.13, APP-248 Appendix 19-2 Section 1.4.13, APP-277 Outline Construction Environmental Management Plan Table 13, APP-071 Chapter 19 Sections 19.12.3 and 19.12.4. Issue: It is unclear whether ground investigation to confirm the conceptual model is proposed to be carried out for several parts of the Proposed Development. Impact: Potentially significant sources of contamination may not be investigated and assessed ahead of the construction phase. This may not align with Paragraph 189 of the National Planning Policy Framework. Solution: Confirm intrusive ground investigation proposals to be carried out prior to the commencement of the construction phase. Additional Narrative / explanation Although the table 13 states that ground investigations will be deployed within the Cable Corridor Southwest to identify the presence of mining related hazards, no further detail of ground investigation proposals is provided. The Applicant should confirm the proposed outline extent and scope of ground investigations, including consideration of potentially contaminated features. Chapter 19 states that ground investigation will be carried out to identify	Ground investigation prior to the commencement of construction is secured through the **Outline Construction Environmental Management Plan (CEMP) [APP-277]** and will be applicable to the entire Scheme. The ground investigation will inform construction design and risk management, including confirmation of ground conditions, geohazards and contamination risks, in line with the findings of the PRAs. A Discovery and Inspection Strategy is also secured through the **Outline CEMP [APP-277]** and will apply across the whole of the Scheme. The Strategy provides a framework for identifying and managing any unexpected contamination encountered during groundworks, ensuring that appropriate measures are implemented where required. The measures set out within the **Outline CEMP [APP-277]** are secured by a requirement in Schedule 2 of the **Draft Development Consent Order [APP-016]**, which requires a detailed CEMP to be submitted to and approved by the relevant planning authority prior to construction, to be substantially in accordance with the **Outline CEMP [APP-277]**, and for construction works to be carried out in accordance with the approved CEMP.

			mining related features, and in the vicinity of the 132Kv and 400Kv substations to inform foundation design. None of the other recommendations for intrusive ground investigation from the Preliminary Risk Assessment reports (Appendices 19-1 to 19-8) are given in Chapter 19, and no summary of the potential sources of contamination identified in the PRAs is provided in the Chapter. An entry in the Commitments Register for Ground Conditions and Contamination also states “Intrusive ground investigation will be undertaken in any areas impacted by identified geohazards and in locations where permanent structures are to be deployed. Data collection would inform foundation design choices and cable routing options.” This should also be updated to reflect the recommendations of the PRA reports.	

EA-044	Ground Conditions	Groundwater and Contaminated Land	Document / Reference(s): APP-247Appendix 19-1 Section 1.2.11, APP-248 Appendix 19-2 Section 1.2.11, APP-249 Appendix 19-3 Section 1.2.11, APP-250 Appendix 19-4 Section 1.2.12, APP-251 Appendix 19-5 Section 1.2.11, APP-253 Appendix 19-7 Section 1.2.10, APP-254 Appendix 19-8 Section 1.2.13 Issue: A supporting information source is needed to prove risks from regulated activities are not likely to be acceptable with respect to the site development Impact: Potentially significant sources of contamination may be incorrectly discounted. Solution: Provide suitable justification for selecting the distances beyond which off-site contamination sources would not be significant.	There is no statutory guidance prescribing a fixed distance beyond which potential contamination sources should or should not be considered. In line with standard Preliminary Risk Assessment methodology, regulated activities (including those subject to the Environmental Permitting Regulations) have been considered alongside other potential sources of contamination and screened on a site specific, risk based basis, taking into account the nature of the activity, pathway plausibility and receptor sensitivity. It is considered reasonable to discount potential future risks from regulated processes given the regulatory framework that applies to those activities, which is designed to prevent unacceptable risks to land and controlled waters. On this basis, the screening distances applied in the PRAs are considered appropriate for the purposes of a Preliminary Risk Assessment. Notwithstanding this, any unexpected contamination encountered during construction would be managed through the Discovery and Inspection Strategy, which is secured through the **Outline Construction Environmental Management Plan (CEMP) [APP-277]** and applies across the Scheme. The measures contained within the **Outline CEMP [APP-277]** are secured by a requirement in Schedule 2 of the **Draft Development Consent Order [APP-016]**, which requires a detailed CEMP to

				be approved prior to construction and implemented in accordance with the approved plan.

EA-045	Ground Conditions	Groundwater and Contaminated Land	Document / Reference(s): APP-254 Appendix 19-8 Table 4 and Table 5 Issue: No discussion of the implications of Monks Park Mine on cable installation, ground stability and HDD works is presented. Impact: Uncertainty regarding risks posed to controlled waters from the presence and historic use of Monks Park Mine. Solution: The Applicant should clarify the anticipated implications of the presence of Monks Park Mine, including consideration of the potential for mobile contaminants. Additional Narrative/ explanation The Applicant should employ a precautionary approach in the absence of confirmation. It should not be assumed that all historic military equipment and materials which were present historically are no longer present. It should also be recognised that even if historic equipment has been removed, there could be historic spills and leaks which may not have been fully remediated at the time that the Monks Park Mine site was in operation, and sources of contamination which may not have been recognised at the time of operation (such as PFAS) could be present in soils and groundwater. The storage of munitions may also have resulted in fugitive emissions to soil and groundwater which could potentially be encountered during ground works.	The presence of Monks Park Mine and associated ground risks have been assessed within **ES Volume 1, Chapter 19: Ground Conditions [APP-071],** with supporting information provided in the relevant Preliminary Risk Assessments contained in **ES Volume 3, Appendix 19 8 [APP-254].** These assessments identify historic mining features as potential sources of ground risk and consider potential pathways to groundwater and controlled waters. In addition, a Mining Risk Assessment has been prepared to specifically consider geohazards associated with historic mining, including ground stability risks relevant to construction activities such as cable installation and HDD works (**ES Volume 3, Appendix 19 11: Mining Risk Assessment [APP-257]**). In addition, a memo has been produced in order to outline the ground investigation works the applicant intends to carry out in the vicinity of Monks Park Mine. Further ground investigation prior to the construction phase is secured through the **Outline Construction Environmental Management Plan (CEMP) [APP-277]** and will be undertaken to confirm ground conditions and manage risks associated with geohazards and potential contamination, including those related to historic mining features where relevant. The **Outline CEMP [APP-277]** also includes a Discovery and Inspection Strategy, which provides a mechanism for identifying and managing any unexpected

				ground conditions or contamination encountered during construction. This ensures that a precautionary approach is applied during groundworks should unanticipated contamination or mining related issues be identified. The measures set out within the **Outline CEMP [APP-277]** are secured by a requirement in Schedule 2 of the **Draft Development Consent Order [APP-016],** which requires a detailed CEMP to be submitted to and approved by the relevant planning authority prior to construction, to be substantially in accordance with the **Outline CEMP [APP-277]**, and for construction works to be carried out in accordance with the approved CEMP.

EA-046	Hydrology, Flood Risk and Drainage	Groundwater and Contaminated Land	Document / Reference(s): APP-211 Appendices 11-2 to 11-9 Flood Risk Assessment and Drainage Strategy – Lime Down A to E2 and Cable Connection Corridor Issue: No drainage strategies are provided for the proposed 400kV and 132kV Substations. Impact: It is unclear what the proposed drainage solution for Substation structures will be, and how spills and leaks and firewater from plant containing hazardous and polluting substances will be managed. Solution: The Applicant should provide Drainage Strategies for the proposed Substations. Additional Narrative/ explanation Only one report, Appendix 11-6 (APP-215), includes a Drainage Strategy specifically for the BESS Area. No Drainage Strategies are provided for other key structures such as the 400kV and 132kV Substations. Where Substations are proposed (Lime Down C1, Lime Down D and Lime Down E1, their positions are discussed briefly in the corresponding reports (Appendices 11-4, 11-6 and 11-7) with respect to flood risk. However, the figures presented in the report do not clearly show these features. Appendix 11-8 refers to the presence of a proposed substation area in Section 2.3.6 however there is no proposed substation within the site.	Drainage principles for the proposed 400 kV and 132 kV substations are established for the Scheme and comprise a sealed, isolatable drainage approach with appropriate pollution control measures to manage spills, leaks and any firewater, consistent with the principles applied at the BESS. Potential effects on controlled waters, including groundwater receptors, are considered within the submitted assessments, and the update described below will provide clearer signposting to the relevant controls and receptors. **Water Framework Directive Assessment [APP/7.11]** and **Environmental Statement Chapter 11 Hydrology, Flood Risk and Drainage [APP-063]**. To address the Environment Agency's point on clarity and presentation, the Applicant will update the relevant Flood Risk Assessment and Drainage Strategy appendices at Deadline 1 where substations are proposed to include a discrete substation drainage strategy section. This will confirm the sealed and isolatable drainage principle, the provision of appropriate treatment measures (such as oil water interceptors where required), and will clarify which firewater and pollution control measures apply to substations where currently described alongside the BESS. Any erroneous references to a substation where none is proposed will also be corrected. The assessment conclusions remain unchanged.

			Substations should incorporate sealed surface water drainage systems and features such as oil water interceptors to prevent the loss of hazardous and polluting substances to ground in the event of spills and leaks or fire involving plant such as transformers. Section 4.2.3 of Appendix 11-6 does refer to firewater management and other surface water pollution risks being managed. However, this is in the context of both the proposed BESS and 400kV Substation compound and it is not clear which are intended to apply to the Substation. The Flood Risk Assessment and Drainage Strategy reports discuss the Water Framework Directive (WFD) surface water bodies present at each Study Area. However, make no reference to the WFD groundwater bodies. These are sensitive receptors in their own right and should be taken into consideration.	In addition, to provide a single point of reference for firewater and pollution control measures, the Applicant is preparing standalone drainage strategy plan(s) for the BESS and substations. These will be cross-referenced within the relevant FRA and drainage strategy appendices and the **Outline Battery Safety Management Plan [APP-286]** to improve clarity without changing the assessment conclusions. The Applicant will update the relevant application documents as set out above.

EA-047	Hydrology, Flood Risk and Drainage	Groundwater and Contaminated Land	Document / Reference(s): APP-215 Appendix 11-6 Flood Risk Assessment and Drainage Strategy – Lime Down D BESS Section 3.5 Issue: No reference to the requirement for the drainage system to be fully impermeably lined. Impact: It is unclear that the BESS drainage is required to be lined. Solution: The Applicant should present the SuDS options with consideration of the need for sealed drainage. Additional Narrative/ explanation The Applicant should clearly state that the BESS Area drainage system lining must be impermeable. The disposal of firewater should be determined in consultation with the Environment Agency.	The BESS drainage strategy is based on a sealed and lined containment system designed to retain operational spillages and any firefighting water within the BESS catchment, with the ability to isolate drainage during an incident. This committed principle is described in **Flood Risk Assessment and Drainage Strategy – Lime Down D / BESS [APP-215]** and assessed in **Environmental Statement Chapter 11 Hydrology, Flood Risk and Drainage [APP-063]**. The approach is consistent with the **Outline Battery Safety Management Plan [APP-286]**, which confirms that firewater runoff would be contained through a controlled and isolatable drainage system, with testing and off-site removal or controlled discharge as appropriate in consultation with the Environment Agency and Dorset and Wiltshire Fire and Rescue Service. While the containment system is designed to be sealed and lined to achieve the required containment performance, the Applicant avoids absolute terminology such as “impermeable” because final material specifications are confirmed at detailed design; the system will nonetheless be designed to meet the required containment standards and regulator expectations. For clarity only, **Flood Risk Assessment and Drainage Strategy – Lime Down D / BESS [APP-215]** will be updated at Deadline 1 to explicitly state the sealed and lined containment principle, the isolation capability, and to signpost to the

				standalone BESS drainage strategy plan being prepared to provide a single point of reference for the containment and firewater management arrangement. The Applicant will update the relevant application documents as set out above.
EA-048	Hydrology, Flood Risk and Drainage	Groundwater and Contaminated Land	Document / Reference(s): APP-215 Appendix 11-6 Flood Risk Assessment and Drainage Strategy – Lime Down D BESS Table 4 Issue: Table 4: SuDS Mitigation Indices is blank. Impact: The degree of mitigation afforded against contaminants by the proposed gravel drainage medium is not given. Solution: Table 4 should be populated.	The Applicant notes the comment. Table 4 in **Flood Risk Assessment and Drainage Strategy – Lime Down D / BESS [APP-215]** will be populated to confirm the SuDS mitigation indices associated with the proposed drainage medium and treatment train assumptions. The Applicant will update the relevant application documents as set out above.

EA-049	Hydrology, Flood Risk and Drainage	Flood Risk and Flood Modelling	Document Reference(s): APP-210 Lime Down Solar Park Environmental Statement Volume 3 Appendix 11-1: Flood Risk Assessment and Drainage Strategy – Lime Down Covering Report. General comment on Functional Floodplain (Flood Zone 3b) Issue: It is not clear if any elements of the development are within the Functional Floodplain (Flood Zone 3b). Impact: Potential loss of storage and increases in flood risk. Solution: Please make it clear within the Flood Risk Assessment whether there are any aspects of the development within functional floodplain (Flood Zone 3b). If this is the case can this area be avoided for development? If this is not possible can appropriate mitigation measures be put in place noting section 5.8.12 of the National Policy Statement for Energy (EN-1). Additional narrative/ explanation It is noted that some parts of the proposal, such as Solar PV Panels, are within areas of fluvial flood risk. The applicant should confirm whether any aspects of built development are contained within Flood Zone 3b. Noting the National Policy Statement for Energy EN-1 section 5.8.12 that states there should be no net loss of floodplain storage and any deflection or constriction of flood flow routes should be safely managed within the site.	The Applicant notes the comment and confirms that no built development is proposed within the functional floodplain (Flood Zone 3b represents the Functional Floodplain), as assessed in **Environmental Statement Chapter 11 Hydrology, Flood Risk and Drainage [APP-063]** and summarised in **Flood Risk Assessment and Drainage Strategy – Lime Down Covering Report [APP-210].** Minor areas of panelled development are located within Flood Zone 3 where the Order Limits intersect mapped fluvial flood extents, including at Lime Down D and Lime Down E2, however the Flood Risk Assessment demonstrates that panel supports do not give rise to material displacement of floodplain storage or obstruction to flood flows and therefore do not increase flood risk. For clarity only, the Applicant will update **Flood Risk Assessment and Drainage Strategy – Lime Down D / BESS [APP-215]** and **Flood Risk Assessment and Drainage Strategy – Lime Down E2 [APP-217]** to explicitly confirm that the panelled areas within mapped flood extents at these locations are not located within Flood Zone 3b. The Applicant will update the relevant application documents as set out above. Regarding the query around built aspects of the development being contained within Flood Zone 3b, the Applicant confirms no substations, BESS or other built development are proposed within mapped fluvial flood extents, and

			With respect to the construction phase of the development, stockpiles, materials, and laydown areas should be outside Flood Zone 3 where possible and must be outside of Flood Zone 3b.	interaction with Flood Zones 2 and 3 is limited to minor areas of Solar PV panelled development only, as set out in **Flood Risk Assessment and Drainage Strategy – Covering Report [APP-210]** and **Environmental Statement Chapter 11 Hydrology, Flood Risk and Drainage [APP-063].** With respect to construction, the Applicant confirms that temporary works will be planned to avoid Flood Zone 3b. Stockpiles, materials storage and laydown areas will be located outside Flood Zone 3 where reasonably practicable and will be excluded from Flood Zone 3b, with the detailed layout and flood risk controls secured through the **Outline Construction Environmental Management Plan [APP-277]** and approved at discharge under the draft DCO.

EA-050	Hydrology, Flood Risk and Drainage	Flood Risk and Flood Modelling	Document Reference(s): APP-210 Lime Down Solar Park Environmental Statement Volume 3 Appendix 11-1: Flood Risk Assessment and Drainage Strategy – Lime Down Covering Report. General comment on fencing Issue: Fencing must not inhibit flood flow routes. Impact: Potential increase in flood risk. Solution: Assess proposed fencing to ensure appropriate design. Additional narrative/ explanation There is limited detail within the flood risk assessment covering report and respective flood risk assessments for Lime Down A to E on fences which may surround the development and their interaction with areas of flood risk. Provide clarity on any proposed fencing (for example column and/or wire spacing) and demonstrate that it would not cause a blockage in a flood event and increase flood risk elsewhere. Please be cognisant of National Policy Statement for Energy EN-1 section 5.8.12 which states that flood flow routes should be safely managed.	The proposed fencing to be used within the Order Limits is set out within **ES Volume 1, Chapter 3: The Scheme [APP-055]** under the subheading 'Fencing and Security'. For the majority of the Site fencing would be deer wire mesh and wooden post fencing (see Plate 3-14) with smaller areas of palisade fencing around the substations and BESS Area. No fencing is proposed that would create a barrier to floodwater or increase flood risk elsewhere. The Applicant will include additional narrative within **Appendices 11-2 to 11-8 Flood Risk Assessment and Drainage Strategy Lime Down A to E [APP-211 to 218]** to confirm that fencing in these areas will be permeable to flow and designed to avoid blockage during flood conditions, in accordance with the assessed flood risk principles. The Applicant will update the relevant application documents as set out above.

EA-051	Hydrology, Flood Risk and Drainage	Flood Risk and Flood Modelling	Document Reference(s): APP-210 Lime Down Solar Park Environmental Statement Volume 3. Appendix 11-1 Flood Risk Assessment and Drainage Strategy - Lime Down Covering Report Issue: There is no assessment of the impacts the construction phase of the development will have on flood risk. Impact: Temporary flood risk increases may occur and impact third parties. Solution: The Applicant needs to provide details of the storage of materials, site compounds, temporary roads and/or crossings. An assessment of the impacts this may have on flood risk should be assessed and appropriate mitigation provided.	The Applicant notes the comment. Construction phase flood risk effects have been assessed within **ES Chapter 11 Hydrology, Flood Risk and Drainage [APP-063]** between Paragraphs 11.10.2 and 11.10.32 under the subheading 'Construction'. Mitigation is set out through the construction and flood risk control framework, including measures for managing temporary works, compounds, material storage and surface water during construction, as reported in the **Outline Construction Environmental Management Plan (CEMP) [APP-277]** and secured by Requirement 13 of **Draft DCO [APP-016]**. No additional construction phase assessment is required. The detailed location and management of compounds, temporary access, crossings and material storage will be confirmed through the detailed CEMP at discharge, in consultation with the relevant bodies, with controls to ensure there is no increase in offsite flood risk. No amendments to the application documents are required.

EA-052	Hydrology, Flood Risk and Drainage	Flood Risk and Flood Modelling	Document Reference(s): APP-211 Environmental Statement Volume 3 Appendix 11-2 to 11-8 Flood Risk Assessment and Drainage Strategy Lime Down A to E Section 2.11.1 Issue: It is not clear what freeboard allowances are proposed. Impact: Mitigation measures may be inappropriate in areas of flood risk where there are uncertainties in the design flood water level. Solution: Please ensure a freeboard of +600 millimetres (mm) is provided above the design flood level. Additional narrative/ explanation (if necessary) Section 2.11.1 within the respective Flood Risk Assessments for Lime Down A to E briefly describe freeboard above the “local flood level”. For clarity, as a starting point, a freeboard of +600mm should be provided above the design flood level for any solar panels, inverters, transformers, and Battery Energy Storage Systems (BESS) which fall within the design flood extent (including any proxies which are used to inform fluvial flood risk such as the Risk of Flooding from Surface Water (RoFSW) mapping). It may be possible to reduce freeboard in some cases to +300mm where more detailed modelling exists and sensitivity testing demonstrates that the uncertainties in model outputs have limited impact on flood levels.	Where Solar PV panelled areas locally encroach into Flood Zone 3, the embedded mitigation applies a minimum freeboard of 600 mm above the 1% AEP plus climate change flood level, informed by site specific flood level information where available. At Lime Down D, a site specific hydraulic model of Gauze Brook has been undertaken and is reported in **Flood Risk Assessment and Drainage Strategy – Lime Down D / BESS [APP-215]**, providing detailed flood levels and depth mapping to inform layout and application of the freeboard measures. At Lime Down E2, fluvial water level and depth mapping is presented in **Flood Risk Assessment and Drainage Strategy – Lime Down E2 [APP-217],** demonstrating that interaction with flood extents is limited in depth and extent and confirming where the embedded freeboard mitigation is triggered.

EA-053	Hydrology, Flood Risk and Drainage	Flood Risk and Flood Modelling	Document Reference(s): APP-215 Lime Down Solar Park Environmental Statement Volume 3. Appendix 11-6 Flood Risk Assessment and Drainage Strategy Lime Down D/BESS Section 2.3.6 Issue: Hydraulic model files for the Gauze Brook have not been reviewed. Impact: The assessment of flood risk for the Gauze Brook could be inaccurate or underestimated which could lead to inappropriate mitigation. Solution: Please provide the Gauze Brook hydraulic model files to the Environment Agency for review. Additional narrative/ explanation Whilst the inclusion of detailed hydraulic modelling for the Gauze Brook is welcomed, we have not reviewed the model files. It is not clear what method has been adopted in terms of the calculation of design flows which have been applied to the hydraulic model and any other assumptions that have been made.	The Applicant notes this comment. At Lime Down D, a site specific hydraulic model of Gauze Brook has been undertaken and is reported in **Flood Risk Assessment and Drainage Strategy – Lime Down D / BESS [APP-215]**, providing detailed flood levels and depth mapping to inform layout and application of the freeboard measures. The Hydraulic Modelling Report to support the bespoke Gauze Brook Model will be provided to the Environment Agency ahead of Deadline 1.

EA-054	Hydrology, Flood Risk and Drainage	Flood Risk and Flood Modelling	Document Reference(s): APP-215 Lime Down Solar Park Environmental Statement Volume 3. Appendix 11-6 Flood Risk Assessment and Drainage Strategy Lime Down D/BESS Section 2.3.20 Issue: It is not clear how the analysis extent area of 275,000m2 has been derived. Impact: Flood risk impacts could be underestimated Solution: Please provide a map and/or additional clarity on how the surface area of 275,000m2 has been derived. Is this the area of the design flood extent for the Gauze Brook that bisects the order limits for the development? Additional narrative/ explanation (if necessary) This section notes that there is a displaced volume from the solar panel supports of 11.59m3 and that this equates to a theoretical level change of 0.000042mm (based on an area of influence of 275,000m2). It is not clear how the analysis area has been derived. This could affect the estimated impact of level change and hence further detail should be provided so this can be checked.	The Applicant notes the comment. The 275,000 m² analysis extent is derived from the defined downstream floodplain boundary at the main road crossing (junction of Mill Lane and Main Road), which provides a practical hydrological extent for assessing any potential change in flood levels upstream, as set out in **Flood Risk Assessment and Drainage Strategy – Lime Down D / BESS [APP-215]**. The Applicant will add a figure to **Flood Risk Assessment and Drainage Strategy – Lime Down D / BESS [APP-215]** showing the downstream floodplain extent used in the assessment. This will not change the assessment methodology or conclusions. The Applicant will update the relevant application documents at Deadline 1 as set out above.

EA-055	Hydrology, Flood Risk and Drainage	Flood Risk and Flood Modelling	Document Reference(s): APP-215 Lime Down Solar Park Environmental Statement Volume 3. Appendix 11-6 Flood Risk Assessment and Drainage Strategy Lime Down D/BESS Section 2.3.20 Issue: Impacts of the solar panel support frames on flood flow conveyance is not discussed. Impact: Flood risk impacts and blockage risk from the solar panel support frames could be underestimated. Solution: Please confirm how any deflection or constriction of flood flow routes from the solar panel supports is safely managed and will not increase flood risk elsewhere. Additional narrative/ explanation (if necessary) The mapped depth outputs as shown in Annex B of the Flood Risk Assessment for Lime Down D are useful but it is not clear what the flood flow velocities are in the vicinity of the developed areas. This is particularly important to understand noting National Policy Statement for Energy EN-1 section 5.8.12 states that any deflection or constriction of flood flow routes should be safely managed within the site. The impacts of the solar panel support frames on flow conveyance should be tested using hydraulic modelling, for example by using a flow constriction approach or an area of increased surface roughness.	The Applicant notes the comment. Interaction between Solar PV panel support frames and areas of fluvial flood risk is limited in extent and occurs only where shallow flooding is predicted, with no substations, BESS or other solid infrastructure located within mapped flood extents, as assessed in **Flood Risk Assessment and Drainage Strategy – Lime Down D / BESS [APP-215]** and **Flood Risk Assessment and Drainage Strategy – Lime Down E2 [APP-217].** In these locations, Solar PV panels are supported on discrete, slender posts with open spacing that allows floodwater to pass beneath the arrays without forming continuous obstructions or barriers to flow. The Flood Risk Assessment demonstrates that floodplain interaction is limited spatially, flood depths are shallow, and the panel support arrangement does not materially alter flow paths, increase friction to a degree that would affect flood routing, or cause flow deflection that could increase flood risk elsewhere. This conclusion is consistent with the scheme wide assessment set out in **Flood Risk Assessment and Drainage Strategy – Covering Report [APP-210]** and accords with National Policy Statement EN-1 paragraph 5.8.12. To address the point raised, the Applicant will include additional clarification within **Flood Risk Assessment and Drainage Strategy – Lime Down D / BESS [APP-215]** and **Flood Risk Assessment and Drainage Strategy – Lime Down E2 [APP-217]** explicitly confirming how flood

				flow conveyance beneath panel arrays is maintained and why the assessed interaction does not give rise to a material change in flood behaviour.

EA-056	Hydrology, Flood Risk and Drainage	Flood Risk and Flood Modelling	Document Reference(s): APP-217 Lime Down Solar Park Environmental Statement Volume 3. Appendix 11-8 Flood Risk Assessment and Drainage Strategy Lime Down E2 section 2.3.15 page 13 Issue: It is not clear how the analysis extent area of 175,580m2 has been derived. Impact: Flood risk impacts could be underestimated. Solution: Please provide a map and/or additional clarity on how the surface area of 175,580m2 has been derived. Is this the area of the design flood extent for the Gabriels Well/Rodbourne Brook that bisects the order limits for the development? Additional narrative/ explanation (if necessary) This section notes that there is a displaced volume from the solar panel supports of 2.09m3 and that this equates to a theoretical level change of 0.000012mm (based on an area of influence of 175,580m2). It is not clear how the analysis area has been derived. This could affect the estimated impact of level change and so further detail should be provided so this can be checked.	The Applicant notes the comment. The analysis extent of approximately 175,580 m² represents the floodplain area upstream of a defined downstream control point on the Gabriels Well/Rodbourne Brook, selected as a practical hydrological boundary where floodplain connectivity is constrained, as described in **Flood Risk Assessment and Drainage Strategy – Lime Down E2 [APP-217].** To address the request for clarity, the Applicant will include a plan within **Flood Risk Assessment and Drainage Strategy – Lime Down E2 [APP-217]** illustrating the defined floodplain extent used in the calculation and the location of the downstream control point. This will confirm how the area over which the displaced volume has been distributed was derived and demonstrate that the resulting theoretical change in flood level remains de minimis. The Applicant will update the relevant application documents as set out above.

EA-057	Hydrology, Flood Risk and Drainage	Flood Risk and Flood Modelling	Document Reference(s): APP-217 Lime Down Solar Park Environmental Statement Volume 3. Appendix 11-8 Flood Risk Assessment and Drainage Strategy Lime Down E2 section 2.3.15 page 13 Issue: Impacts of the solar panel support frames on flood flow conveyance is not discussed. Impact: Flood risk impacts and blockage risk from the solar panel support frames could be underestimated. Solution: Please confirm how any deflection or constriction of flood flow routes from the solar panel supports is safely managed and will not increase flood risk elsewhere. Additional narrative/ explanation The mapped depth outputs as shown in Figure 7 of the Flood Risk Assessment for Lime Down E2 are useful, but it is not clear what the flood flow velocities are in the vicinity of the developed areas. This is particularly important to understand, noting National Policy Statement for Energy EN-1 section 5.8.12 states that any deflection or constriction of flood flow routes should be safely managed within the site. The impacts of the solar panel support frames on flow conveyance should be tested using hydraulic modelling. For example by using a flow constriction approach or an area of increased surface roughness.	Interaction between the Scheme and fluvial flood extents at Lime Down E2 is limited to small, discrete areas of panelled land adjacent to Gabriels Well/Rodbourne Brook, as assessed in **Flood Risk Assessment and Drainage Strategy – Lime Down E2 [APP-217]**. No buildings, substations or BESS infrastructure are located within flood extents, and floodplain flow routes remain largely unobstructed. The solar panel support frames comprise slender posts with wide spacing, resulting in negligible blockage, deflection or increase in hydraulic roughness at the floodplain scale. Flood depth mapping demonstrates shallow, low-energy inundation in these locations, with flow paths aligned parallel to the watercourse rather than across the panel rows. On this basis, the potential for material effects on flood conveyance or increased flood risk elsewhere is assessed to be negligible and consistent with the principles set out in **Environmental Statement Chapter 11 Hydrology, Flood Risk and Drainage [APP-063]**. To address the request for confirmation, additional narrative will be included within **Flood Risk Assessment and Drainage Strategy – Lime Down E2 [APP-217]** to explicitly describe how solar panel supports interact with flood flows, confirm that no unsafe deflection or constriction of flood routes would occur, and reiterate that freeboard of 600 mm above the 1 percent AEP plus climate change flood

				level applies where panelled areas intersect mapped flood extents.

EA-058	Construction and Decommissioning	Other Documents	Document / Reference(s) APP-279 7.14 Outline Decommissioning Strategy Issue: There is no clear commitment to the production of an outline or detailed Decommissioning Environmental Management Plan. Impact: Management of environmental risks during the decommissioning phase may not be sufficient. Solution: The Applicant should confirm the development of a standalone Decommissioning Environmental Management Plan. Or that the outline and detailed Decommissioning Strategies will set out and secure environmental risk management equivalent to those secured during the construction and operational phases in the oCEMP and oOEMP. Additional Narrative/ explanation Section 4.1.1 confirms that a suite of complementary environmental plans and procedures will be developed for the decommissioning phase alongside the detailed Decommissioning Strategy. The Outline Decommissioning Strategy appears to be intended to secure environmental mitigation for the decommissioning stage broadly equivalently to the function of the oCEMP and oOEMP for the construction and operational phases.	An **Outline Decommissioning Strategy [APP-279]** has been prepared which secures the environmental mitigation for the decommissioning stage. The **Outline Decommissioning Strategy [APP-279]** will be developed into a Detailed Decommissioning Strategy post consent as secured by Requirement 21 the **Draft DCO [APP-016].**

EA-059	Construction and Decommissioning	Other Documents	Document / Reference(s) APP-183 Appendix 3-2 Cable Route Construction Method Statement Section 1.9.2, APP-277 Outline Construction Environmental Management Plan Table 5 Issue: The Applicant states in the Cable Route Construction Method Statement "Should any contaminated spoil be identified during construction, this would be transported off site to a licenced waste facility for treatment." Impact: The statement is not in line with the Discovery and Inspection Strategy. Solution: Amend the statement to align with the Discovery and Inspection Strategy. This also applies to suspected contamination and to any soil or water encountered during the works, not just spoil. Additional Narrative/ explanation The wording presented in Table 5 of the outline CEMP is broadly similar but less prescriptive "If any suspected contaminated material is discovered during the works, the contractor would be required to investigate the areas and assess the need for containment or disposal of the material. If material is considered to be contaminated, it will be disposed of to an appropriately licensed facility"	The Applicant notes this comment. A Discovery and Inspection Strategy is secured through the **Outline Construction Environmental Management Plan (OCEMP) [APP-277]** and will apply to excavation activities across the entire Scheme, ensuring any unexpected ground conditions or contamination encountered are identified and managed in accordance with the approved CEMP. The **Cable Route Construction Method Statement [APP-183]** and Table 5 of the **OCEMP [APP-277]** will be amended reference the Discovery and Inspection Strategy.

EA-060	Ecology and Biodiversity	Other Documents	Document Reference(s): APP-273 Biodiversity Net Gain (BNG) Assessment Issue: The Biodiversity trading rules have not been met. Impact: Even if project has achieved net gain in all aspects, not meeting the trading rules could result in the BNG plan being rejected. Solution: Ensure that trading rules are met. Additional narrative/ explanation “The trading rules only apply up to the point of no net loss. Once trading rules have been met, biodiversity net gain requirements can be met by the creation and enhancement of any habitat, provided it is within the relevant module.”, c.f. The Statutory Biodiversity Metric User Guide.	The Applicant notes this comment. A full justification for the single habitat trading rule not being met is provided in paragraphs 1.11.10 - 1.11.16 of the **Biodiversity Net Gain Assessment Report [APP-273]**. This relates to the loss of habitats within the ‘Cropland’ broad habitat type, and is considered an artefact of the Statutory Metric, given that these habitats will in reality be retained and enhanced through the Scheme. Therefore, taking into account professional judgement, the BNG assessment is considered to be compliant with trading rules.

EA-061	Ecology and Biodiversity	Other Documents	Document Reference(s): APP-273 Biodiversity Net Gain (BNG) Assessment Issue: Full BNG metric has not be provided, with Tab C-1 (watercourse baseline) missing. Condition assessment data not provided. Impact: Not possible to verify the BNG calculation. Solution: Provide full BNG metric spreadsheet, condition assessment data and a means of cross referencing baseline (including condition) and post development habitat proposals with a plan. This should include details of riparian and watercourse encroachment.	The full Statutory Biodiversity Metric has been provided in **Biodiversity Net Gain Assessment: Statutory Biodiversity Metric Calculation [APP-274]**. Tab C-1 - On-Site Watercourse Baseline is provided on Page 10 of this document. Notwithstanding, a copy of the **Biodiversity Net Gain Assessment: Statutory Biodiversity Metric Calculation [APP-274]** in excel format has been submitted at Deadline A Figures showing the baseline and proposed habitats are provided in Plates 3 - 24 at the end of the **Biodiversity Net Gain Assessment Report [APP-273]**. Given the sheer number of area and linear habitat parcels present across the Sites, it was not considered proportionate to provide each condition assessment individually for submission. However, a summary of the condition assessment scores for each specific habitat, hedgerow and watercourse type is provided in Table 3: Summary of Baseline Habitats - Solar PV Sites in the **Biodiversity Net Gain Assessment Report [APP-273].**

EA-062	Ecology and Biodiversity	Other Documents	Document Reference(s): APP-283 Outline Landscape and Ecological Management Plan Issue: Planting strategy misses opportunities to enhance the environment. 1.3.57: 'trees with native shrub planting…along watercourses' - consideration should be given to tree species used, particularly those preferred by beaver as these could be felled for dam/lodge building or stripped for food in areas where beaver are active. 1.3.121: planting of trees…adjacent to…rivers - comment as above regarding beaver and species used. Impact: Missed opportunities to enhance the environment. Solution: Make changes as suggested.	The Applicant notes this comment. Consideration will be given to tree species favoured by beavers during the preparation of the detailed Landscape and Ecological Management Plan, which will need to substantially in accordance with the **Outline Landscape and Environmental Management Plan (OLEMP) [APP-283]** secured through Requirement 7 in Schedule 2 of the **Draft Development Consent Order [APP-016]**. The Applicant welcomes the opportunity to prepare the detailed Landscape and Ecological Management Plan in consultation with the EA.
EA-063	Hydrology, Flood Risk and Drainage	Other Documents	Document Reference(s): APP276 - Water Framework Directive Assessment, Table 2: Summary of WFD Surface Water and Groundwater Bodies Issue: Hydromorphological Supporting Elements "Supports Good" Impact: In place of the terminology "Supports Good", the new terminology is "not high." This indicates that work may need to be undertaken to enhance hydromorphology in order to increase the WFD status of the waterbody. Solution: Change the description from "Supports Good" to "Not High" and possibly add an explanation.	The Applicant notes the comment and will update the terminology in Table 2 to reflect the current Environment Agency classification, replacing "Supports Good" with "Not High" where relevant in **Water Framework Directive Assessment [APP-276].**

			Additional narrative/ explanation A recent change in terminology from "Supports Good" to "Not High" has been made to the Hydromorphological Supporting Elements/Regime. This is due to the "Supports Good" terminology implying that the condition of the river was "OK" and nothing needed to be done to improve the hydromorphology. The new term "Not High" shows that the hydromorphology is not "OK" and seeks to encourage actions to improve/uplift the quality of the hydromorphology.	
EA-064	Hydrology, Flood Risk and Drainage	Other Documents	Document Reference(s): APP276 7.11 Water Framework Directive Assessment Issue: The assessment does not identify or discuss Groundwater Dependent Terrestrial Ecosystems (GWDTEs) Impact: Potential for impacts to occur to GWDTEs if risks are not adequately assessed and mitigated. Solution: The Applicant should update the WFD Assessment to account for GWDTEs. Additional narrative/ explanation Although Section 3.2.6 of the WFD Assessment references the ability to support GWDTEs as being a key consideration in the designation of WFD	The Applicant agrees that the Water Framework Directive assessment should explicitly identify and consider any candidate Groundwater Dependent Terrestrial Ecosystems (GWDTEs) within the Study Area, including whether Harries Ground SSSI could represent a GWDTE receptor and whether there is any plausible impact pathway from the Scheme. The Applicant will therefore update **Water Framework Directive Assessment [APP-276]** by Deadline 2 to include a proportionate review of candidate GWDTEs, including Harries Ground SSSI, and to confirm the assessment of potential impact pathways and the relevance of the Scheme's embedded pollution prevention and drainage controls to groundwater dependent receptors. The

			groundwater bodies, there is no discussion within the report of candidate GWDTE sites or the potential for these to be impacted by the Proposed Development. Harries Ground Site of Special Scientific Interest (SSSI) is present within the Study Area, situated to the immediate north of Lime Down E, and may be a GWDTE on the basis of its habitat designation	Applicant will update the relevant application documents as set out above.
EA-065	Hydrology, Flood Risk and Drainage	Other Documents	Document Reference(s): APP276 7.11 Water Framework Directive Assessment Sections 1.2.4, 5.1.3 and 5.4.2 Issue: Section 1.2.4 states that the Cable Corridor is subsurface infrastructure which will have a negligible impact on WFD status and has thus been excluded from assessment. Impact: Potential impacts on WFD Groundwater bodies have not been considered. Solution: Subsurface infrastructure such as the Cable Corridor could impact the status of WFD Groundwater Bodies and should not be excluded from assessment. Additional narrative/ explanation 5.1.3 and 5.4.2 state “As the cable route	The Applicant agrees that the Water Framework Directive assessment should not imply that the Cable Corridor is excluded from consideration simply because it is subsurface infrastructure, as there remains potential for effects on WFD groundwater bodies if construction is poorly managed or if contaminated materials are encountered and mobilised. The Applicant will update **Water Framework Directive Assessment [APP-276]** to clarify that the Cable Corridor has been assessed in relation to WFD groundwater bodies through construction phase risk pathways and embedded controls, and to amend the relevant wording in Sections 1.2.4, 5.1.3 and 5.4.2 so this is unambiguous. The update will confirm the role of good

			is subsurface infrastructure, it will have a negligible impact on WFD status." This is incorrect, as poor site management and interaction with contamination could lead to a degradation in WFD status.	construction practice and pollution prevention measures in avoiding deterioration of groundwater body status, including appropriate management of any unexpected contamination encountered during cable installation works. The Applicant will update the relevant application documents as set out above.
EA-066	Other Environmental Matters - Battery Safety	Other Documents	Document Reference(s): APP-286 7.21 Outline Battery Safety Management Plan 4.1.30 and Volume 3 Appendix 3-1 Sections 1.2.1 and 1.2.5 Issue: The documents refer to "battery liquid cooling systems with automatic safe operation" and a "Liquid cooling Thermal Management System." Impact: The liquid cooling systems may act as a source of pollution which could impact controlled waters. Solution: Provide details of the products to be used in the proposed liquid cooling systems, and the means by which it will be contained, captured and disposed. Safety Data Sheets should be provided to	Safety Data Sheets and defective battery module protocols will be provided at detailed design and shared with the Environment Agency (EA) when a BESS system is selected. BESS system suppliers will supply relevant maintenance and decommissioning documentation which will prevent any pollution risks. Typically, liquid cooling systems (TMS) are a 50% water / 50% glycol mixture and the TMS is controlled by the battery system's BMS and uses measurements of cell temperatures and ambient temperature to determine the most optimum setting for battery safety and efficiency. Battery modules containing TMS are generally IP67 design so any leakage will

			clearly identify any environmental or health hazards the proposed cooling liquid poses.	be detected and likely be contained, battery modules will be stored in battery racks or battery bays that minimise any external BESS leakage risks. The EA must approve pollution control protocols, and they will be included in the final BSMP produced before BESS construction commences.
EA-067	Other Environmental Matters - Battery Safety	Other Documents	Document Reference(s): APP-286 7.21 Outline Battery Safety Management Plan 4.3.14 Issue: The Plan states that routine maintenance will be undertaken on the BESS equipment every 6-12 months depending on the risk profile of equipment. Impact: Lack of clarity about proposed inspection and maintenance frequency. Solution: The Applicant should provide more detail about the inspection and maintenance frequency and protocols for key controls at the BESS site. Including those for firewater containment systems such as automatic actuating valves.	The precise maintenance schedule for the BESS design will only be known at detailed design when the BESS is selected. The maintenance protocols and requirements are defined in the documentation supplied by the requisite Original Equipment Manufacturers (OEMs) and will be strictly adhered to. Inspection and maintenance requirements for the firewater containment systems in a standalone drainage plan which will be appended to the **Outline BSMP [APP-286]** and submitted at Deadline 1.

EA-068	Other Environmental Matters - Battery Safety	Other Documents	Document / Reference(s): APP-286 7.21 Outline Battery Safety Management Plan 5.3.3 Issue: No details are provided of the proposed testing suite or sampling protocol for potentially contaminated firewater captured at the BESS in a fire event. Impact: The suite of analysis of firewater may not be sufficient to fully characterise the risks posed to controlled waters. Solution: Confirm the proposed sampling and testing protocols including suites of analytes, accreditation status and reporting detection limits. This also applies to any process water which may be used in an internal BESS water based suppression system. Additional Narrative/ explanation The Applicant states, “Fire water runoff may contain particles from a fire; the runoff must be contained and tested before being allowed to discharge to the local watercourses. The water contained by the valves will be tested and released or, if necessary, removed by tanker and treated offsite (in consultation with the relevant consultees at the time). Pollution analysis will always be conducted before removing from site (if polluted) or releasing into drainage systems, if safe to do so”	The Applicant and the Environment Agency have agreed to append a BESS firefighting water drainage strategy to the **Outline Battery Safety Management Plan [APP-286]** at Deadline 1. The strategy will explicitly confirm the sampling and testing protocol for any contained firewater (from boundary cooling) and any process water from an internal BESS water-based suppression system, including use of an appropriately accredited laboratory and reporting of detection limits, prior to any discharge or offsite removal. The Applicant will update the relevant application documents as set out above.

EA-069	Other Environmental Matters - Battery Safety	Other Documents	Document Reference(s): APP-286 7.21 Outline Battery Safety Management Plan (oBSMP) Section 5.5.5 and APP-063 Chapter 11 Section 11.10.50, APP276 7.11 WFD Assessment Table 7 Issue: It is not clear whether the proposed lining of the drainage system at the BESS would be impermeable. Impact: A permeable lining would permit the free uncontrolled mobilisation of contaminants within the drainage system to ground. Solution: The Applicant should clearly state that the BESS drainage system would be fully lined and impermeable. If a granular drainage layer is used, the oBSMP should provide detail on how the drainage system, including potentially contaminated gravel substrate, will be cleaned following the removal of firewater in order to avoid the drainage infrastructure acting as an ongoing secondary source of pollution. Additional narrative/ explanation We strongly recommend that all BESS sites have fully sealed drainage systems, with penstock valves which activate automatically when a fire breaks out. Where BESS sites are designed with fire extinguishing systems that do not rely on water, fire crews may still use water for boundary cooling, and this can contain pollutants from the burning units, including any associated chemical	The Applicant confirms the principle that BESS drainage will be designed to be sealed and isolatable so that any potentially contaminated runoff, including firewater, is retained and managed without uncontrolled discharge to ground. This is consistent with the assessed approach to controlled waters protection. **Environmental Statement Chapter 11 Hydrology, Flood Risk and Drainage [APP-063]**. To provide additional clarity, the Applicant will update **Appendix 11-6 Flood Risk Assessment and Drainage Strategy – Lime Down D (BESS) [APP-215]** to explicitly state this sealed and isolatable drainage principle for the BESS. The Applicant will also update **Outline Battery Safety Management Plan [APP-286]** to clarify the operational management of retained firewater and any potentially contaminated residues following an event. The Applicant will update the relevant application documents as set out above. The Applicant confirms that the **OBSMP [APP-286]** is fully compliant with NFCC revised guidance published in February 2026, and the **OBSMP [APP-286]** is being updated at deadline 1 to fully integrate LSFT and explosion prevention requirements stipulated in NFPA 855 (2026) which was published after the **OBSMP [APP-286]** was submitted.

			leakage, and dust and ash from the air. As such, we expect firewater capture to be included in any design. Operation and activation of penstocks should be included within any maintenance schedule. Firewater must be tested for relevant contaminants to determine if it can be released, or if it needs to be removed from the site for disposal elsewhere. An outline maintenance schedule is provided in Appendix G of Appendix 11-6, however this does not reference the automatically actuated valve system. Where gravel is proposed to be used within an impermeable drainage basin, the operator must demonstrate how they will manage accumulation of silt and pollutants within the base of the gravel. Contaminants from a fire event may accumulate in the gravel even if firewater runoff is identified as being suitable for release. These contaminants would then be released into the natural environment over longer periods of time. The National Fire Chief's Council has published detailed guidance on recommended fire protection measures for BESS sites. We recommend the applicant refers to this when designing the scheme: Grid Scale Battery Energy Storage System planning – Guidance for FRS (nfcc.org.uk)	

EA-070	Ecology and Biodiversity	Water Quality	Water Quality Document Reference(s): APP-277 Outline Construction Environmental Management Plan Issue: Water Quality Mitigation Measures are insufficient Impact: Construction could cause pollution detrimentally impacting protected species. Solution: Incorporate more water quality mitigation measures, including the following: • Vehicle washdown and refuelling to be carried out in designated areas, where there is no risk of pollution. • Concrete laying to not be carried out in wet conditions. • A foul water strategy during construction should be mentioned. • Sediment capture methods to be used on tracks and compounds to reduce the chance of surface run-off pollution. • Fuels, oils, and chemicals should be on impermeable ground, and sufficiently bunded.	The Applicant agrees that the topics raised by the Environment Agency, including washdown and refuelling controls, concrete pours in wet conditions, management of foul water, sediment control on tracks and compounds, and storage of fuels, oils and chemicals are important water quality mitigation measures. The Applicant will update Table 5 of the **Outline Construction Environmental Management Plan [APP-277]** either by clearly signposting to other sections of the O**utline CEMP [APP-277]** or through adding additional text to ensure these items are clearly accounted for.

EA-071	Other Environmental Matters	Waste	Document Reference(s): APP-281 Outline Site Waste Management Plan Issue: No inclusion that waste will be assessed in accordance with Waste Technical Guidance WM3 Impact: Potential misclassification/misdisposal of waste Solution: Include confirmation that an appropriate waste assessment will be carried out in accordance with WM3 before the waste leaves site. Additional narrative/ explanation It is the waste producer's legal responsibility to correctly classify a waste prior to it being moved off site. The procedure for doing this is described in the waste classification technical guidance document WM3. www.gov.uk/government/publications/waste-classification-technical-guidanceRegulations A suitable waste assessment should be determined on a case-by-case basis for each waste stream produced. Please note that WAC testing does not replace the requirement for a comprehensive waste assessment to assess hazardous properties as set out in the WM3 technical guidance document. Depending on the destination of the waste, both WAC and WM3 assessments may be required. Please note that soil is not considered an inert waste. i.e. a waste with no biodegradable content.	**Outline Site Waste Management Plan [APP-281]** Paragraph 1.2.6 sets out duty of care and the requirement to provide an accurate description of the waste when it is transferred to another person. For clarity a reference to WM3 will be added at Deadline 1 to section **Outline Site Waste Management Plan [APP-281].**

EA-072	Description and DCO Process	Permitting Informative	APPENDIX C – ADDITIONAL ADVICE Permitting Informative Between the 26th August 2025 and October 21st 2025, the Government ran a consultation on modernising environmental permitting for industry. A copy of the consultation document can be found at: Consultation on modernising environmental permitting for industry - Defra - Citizen Space Chapter 3 of the consultation outlines a proposal to bring battery energy storage systems into the scope of the Environmental Permitting Regulations. Therefore, depending on the outcome of the consultation and timing of subsequent legislation, the BESS sites may require an environmental permit.	The Applicant notes the comment and agrees that should any changes to the environmental permit regime apply to the Scheme, that the Applicant will ensure that the necessary authorisations are either sought or appropriately disapplied subject to seeking the agreement of the EA.

EA-073	Hyrdology, Flood Risk and Drainage	Fisheries, Biodiversity and Geomorphology	Flood Risk APP-213 Environmental Statement Volume 3. Appendix 11-4 Flood Risk Assessment and Drainage Strategy Lime Down C1. Section 2.4.9 and 2.4.10 page 13 This section notes that a substation is proposed within field C33 and notes that there is a narrow corridor of elevated surface water flood risk along the south-western boundary of field C33. It is noted that in section 2.4.13 it states that the substation will be sequentially located within Field C33 to avoid obstructing the mapped surface water flow routes where feasible with preference given to higher ground where flood risk is negligible. Whilst this is welcomed it should be noted that if this is not possible and parts of the substation are placed in areas of flood risk then appropriate compensatory flood storage should be provided for the substation in line with the requirements laid out in National Policy Statement for Energy EN-1 section 5.8.12.	The Applicant confirms that the substation within Lime Down C1 will be sequentially located within Field C33 to avoid mapped surface water flow routes where feasible, with preference given to higher ground where flood risk is negligible, as already set out in **Appendix 11-4 Flood Risk Assessment and Drainage Strategy Lime Down C1 [APP-213]**. On this basis, the Scheme design avoids obstruction of flow routes and loss of floodplain storage.

EA-074	Ecology and Biodiversity	Fisheries, Biodiversity and Geomorphology	Fisheries, Biodiversity and Geomorphology APP-283 Outline Landscape and Ecological Management Annexe A Outline Management Prescription timetable: where herbicide use is proposed, if near water an Environment Agency permit to use appropriate herbicide is required: Application to use herbicides in or near water - GOV.UK	The Applicant notes this comment. As set out in the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]**, herbicide use will be kept to a minimum and typically only used for spot treatment of injurious weeds where necessary to aid establishment of new grassland, hedgerow and tress, and where weeds are too widespread for effective non-chemical treatments (such as hand pulling). Herbicide treatment is not anticipated to be required either within waterbodies themselves or within the associated riparian zones. However, the **OLEMP [APP-283]** has been updated to note that any proposed use of herbicide within waterbodies or the riparian zones associated within the management of the Scheme must first receive the correct Environment Agency permit. A revised **OLEMP [APP-283]** will be submitted at Deadline 1.

EA-075	Ecology and Biodiversity	Fisheries, Biodiversity and Geomorphology	APP-284 Outline Ecological Protection and Mitigation Strategy Throughout the document there is confusion with method statement numbers and section numbers e.g. method statement for white-clawed crayfish is 14 not 15 as stated under 6.10.1. Other incorrectly referenced method statements include those for INNS (15 not 16) and riparian mammals (9 not 10). It makes the document confusing to read. MS 3 Pollution prevention measures: 4.1.1 should include beaver as they would be impacted by aquatic pollution, or simplify and use 'riparian mammals' as a catch all rather than listing individual species. MS 4 Construction phase lighting: 5.1.1 should include riparian mammals to list of wildlife potentially adversely impacted and include a line to say lighting will be directed away from watercourse corridors wherever possible, also the use of lighting after dusk should be minimised where possible. MS6 7.5 Ditches: 'ditches will be subject to open cut unless identified as being of particular ecological importance' it would be useful to clarify the criteria used to quantify this. MS15 INNS: 16.3 Biosecurity measures – it should be mentioned that if signal or other non-native species of crayfish are encountered e.g. when carrying out open cut of channels, it is an offence under the Wildlife & Countryside Act to return these animals to the wild if they are removed. They should be humanely dispatched and ideally disposed of onsite (burial) rather	The Applicant notes this comment and agrees with all statements therein. A review of the **OEPMS [APP-284]** has been undertaken, and a revised and corrected version of the document which captures all of these comments will be submitted at Deadline 1.

			than being taken away to prevent potentially transferring crayfish plague. There are signal crayfish in the wider catchment so biosecurity is paramount.	
EA-076	Hydrology, Flood Risk and Drainage	Groundwater and Contaminated Land	Groundwater and Contaminated Land- additional advice Document Reference (s): APP-055 Chapter 3 The Scheme Section 3.5.25, APP-063 Chapter 11 Hydrology, Flood Risk and Drainage Sections 11.10.48 to 11.10.54 Issue Chapter 3 states that Chapter 11 provides detail of fire water management but the reader is not referred to the oBSMP, where detail of fire water management is also present. A standalone drainage plan is strongly recommended.	The Applicant agrees that the presentation of firewater and pollution control measures would benefit from clearer consolidation. The Applicant is therefore preparing standalone drainage strategy report(s) for the BESS and substations. These report(s) will set out the sealed and isolatable drainage and containment principles, including firewater management arrangements, in a single consolidated document. To ensure clarity across the application, **ES Volume 1, Chapter 3 The Scheme [APP-055]** will be updated to signpost to the standalone drainage strategy report(s), and relevant application documents will be aligned to reference this consolidated drainage strategy. The standalone drainage strategy report(s) will be submitted at Deadline 1.

EA-077	Hydrology, Flood Risk and Drainage	Groundwater and Contaminated Land	Document Reference (s): APP- 083 Figure 3-3 400 kV Substation and BESS Layout and Appendix 3-1 Annex A The figure does not currently show any aspects of the proposed drainage layout for the BESS and 400kv Substation development.	The Applicant notes the comment. **Figure 3-3: 400 kV Substation and BESS Layout [APP-083]** is illustrative and is not intended to depict the detailed drainage design for the BESS or the 400 kV substation. The drainage strategy, including proposed drainage features, design principles and site-specific arrangements, is provided within **Appendices 11-1 to 11-9 [APP-211 to 218]** of the Environmental Statement, which together set out the full Flood Risk Assessment and Drainage Strategy for each part of the Scheme.
EA-078	Hydrology, Flood Risk and Drainage	Groundwater and Contaminated Land	Document Reference (s): APP-251 Appendix 19-5 Lime Down E Desk Study The Desk Study does not reference the former RAF airfield at Hullavington. Although this lies outside the 250m study area this is situated up topographic gradient from Lime Down E within the Proposed Development site and overlies the same Cornbrash Formation bedrock (Secondary A aquifer) which underlies that part of the site. Although unlikely, it cannot be fully discounted that mobile contamination associated with the airfield could be impacting the site.	**ES Volume 3, Appendix 19-5 Lime Down E Desk Study [APP-251]** will be reviewed to ensure that the assessments contained within are appropriate. However, as noted by the Environment Agency, this feature (former RAF Hullavington) is not within 250m of the study area so was not considered at the time the document was produced.

EA-079	Hydrology, Flood Risk and Drainage	Groundwater and Contaminated Land	Document Reference (s): APP-055 Volume 1 Chapter 3 Section 3.5.34 and APP-286 7.21 outline Battery Safety Management Plan The Applicant states “It is expected that the BESS Area could be replaced up to five times during the operation and maintenance phase.” We presume that this is a typo and should refer to the replacement of batteries rather than the structure of the BESS development itself. We note Chapter 20 (Waste) also references replacement of batteries at the same frequency. Outline protocols for the management of defective end-of-life batteries is provided in Section 4.3.18 and 4.3.19 of the outline Battery Safety Management Plan, which states that such batteries will be “placed in an approved protective container prior to being transported from the defective unit to a dedicated safe location for inspection by an authorised manufacturer’s representative”. The Applicant should provide details of storage and management proposals for damaged, faulty and end-of-life batteries, including management of associated fire propagation and pollutant spill/leak controls. In the Scoping Report, the Applicant referred to the replacement of batteries taking place ‘at least twice’ during the operational phase. Although not an inaccurate statement this did infer a lower frequency of replacement than is currently indicated.	**ES Volume 1, Chapter 3: The Scheme [APP-055]** bullet 2 under paragraph 3.5.34 should read *'The BESS Container batteries could be replaced up to five times'*. As this are minor error and the correct text quoted here has been assessed in the Environmental Statement the Applicant does not propose to update and resubmit Chapter 3: The Scheme. The same correction applies to **ES, Volume 1, Chapter 20: Other Environmental Matters (waste) [APP-072]**. It is proposed that this is only amended should other updates be made. The Applicant currently does not have definitive information regarding the specific BESS cycle requirements or discharging periods. As the operational lifespan of a battery unit is inherently determined by its throughput, there is a correlation between usage and degradation. For example, the more cycles a unit goes through over time, the greater the possibility that replacement will be necessary to maintain the required storage and export capacity (Information provided in user query). By accounting for up to five replacements, the Applicant has ensured that a worst-case scenario for the replacement of equipment has been fully assessed within the Environmental Statement, rather than relying on a more standard 'at least twice' estimate originally mentioned during the scoping phase.

EA-080	Ground Conditions	Groundwater and Contaminated Land	Document Reference (s): APP-071 Chapter 19 Ground Conditions Volume 1, Chapter 19 Section 19.10.2 of the Preliminary Environmental Impact Report recommended that intrusive ground investigation be carried out prior to the submission of the Environmental Statement for geotechnical design purposes. There is no reference to any such ground investigations evident in Chapter 19 of the Environmental Statement. The Applicant should confirm whether this work has been carried out and update the conceptual ground model accordingly if so.	Intrusive ground investigation prior to the construction phase is secured through the **Outline Construction Environmental Management Plan (CEMP) [APP-277]**. This ensures that ground conditions will be verified prior to construction to inform detailed design, including geotechnical considerations, and to confirm the conceptual ground model as appropriate. The **Outline CEMP [APP-277]** is secured by a requirement in Schedule 2 of the **Draft Development Consent Order [APP-016]**, which requires a detailed CEMP to be submitted to and approved by the relevant planning authority prior to construction, to be substantially in accordance with the **Outline CEMP [APP-277]**, and for construction works to be carried out in accordance with the approved CEMP.
EA-081	Ground Conditions	Groundwater and Contaminated Land	Document Reference (s): APP-071 Chapter 19 Ground Conditions Section 9.11.15 The Applicant states that cable decommissioning is proposed to be retention in-situ, but that alternatively "cables can be removed by opening up the ground at regular intervals and pulling the cable through to the extraction point, avoiding the need to open up the entire length of the cable route Corridor". The Applicant should where practicable make allowance to facilitate future removal in the method of cable construction. Poor installation methodology may preclude the viability of effective removal during the decommissioning phase.	The Applicant notes this comment. As outlined in the **Outline Decommissioning Strategy [APP-279]** submitted with the application, flexibility has been intentionally maintained regarding the approach to cable decommissioning. Current industry good practice indicates that the most environmentally acceptable option is typically to leave cables in situ at the end of their operational life, as this avoids unnecessary soil disturbance and associated impacts. However, the final approach will remain subject to prevailing government policy, regulatory guidance, and best practice at the time of decommissioning. Should removal of the cables and associated ducting be

				deemed the most appropriate option at that time, this remains feasible. The Applicant will undertake an assessment at the time of decommissioning to determine the balance of environmental impacts between removing the cables and leaving them in situ. This will include consideration of soil disturbance, potential environmental effects, and up-to-date policy and guidance. The agreed approach will be secured through the Decommissioning Strategy, which will be prepared and submitted for approval by the relevant local authority prior to decommissioning.
EA-082	Ground Conditions	Groundwater and Contaminated Land	Document Reference (s): APP-071 Chapter 19 Ground Conditions Section 19.12.3 The Applicant states “Additional ground investigation will be deployed to confirm the presence of any unrecorded mine workings, shafts, etc which are within the cable alignment in Cable Route Corridor Southwest.” We presume that the ground investigation is ‘additional’ to that stated in Section 19.10.2 “Intrusive ground investigation will be undertaken prior to commencement of construction in areas impacted by identified geohazards and in locations where permanent structures, i.e. substations and BESS Area, are to be deployed”. The Applicant should provide confirmation of the proposed purpose, scope and extent of ground	Intrusive ground investigation prior to the commencement of construction is secured through the **Outline Construction Environmental Management Plan (CEMP) [APP-277]** and is applicable to the entire Scheme. This includes investigation in areas impacted by identified geohazards, locations where permanent structures are to be deployed, and along sections of the cable corridor where historic mining features, such as those within the Cable Route Corridor Southwest, may be present. The purpose of the ground investigation is to confirm ground conditions and manage risks associated with geohazards and contamination prior to construction. The measures set out within the **Outline CEMP [APP-277]** are secured by a requirement in Schedule 2 of the **Draft**

			investigations.	**Development Consent Order [APP-016]**, which requires a detailed CEMP to be submitted to and approved by the relevant planning authority prior to construction, to be substantially in accordance with the **Outline CEMP [APP-277]**, and for construction works to be carried out in accordance with the approved CEMP.
EA-083	Hydrology, Flood Risk and Drainage	Groundwater and Contaminated Land	Document Reference (s): APP-286 7.21 outline Battery Safety Management Plan Sections 4.1.30 and 5.1.4 Section 4.1.30 states that the battery system and transformers serving the BESS will be automatically electrically isolated upon detection of a fire within the BESS enclosure. The Applicant should confirm that manual isolation of these systems will also be available in such a situation should the automatic systems fail for any reason.	Section 4.1.30 stipulates that isolation capability is both "*remote and local*" NFPA 855 and NFCC guidance specify that E-stop system capability must be automatic and manual. The Applicant confirms that *"local"* capability allows for manual isolation of systems and is required under NFPA, UL, and IEC standards for BESS and associated equipment.
EA-084	Hydrology, Flood Risk and Drainage	Groundwater and Contaminated Land	Document Reference (s): APP-286 Section 7.21 outline Battery Safety Management Plan Section 4.2.1 Section 4.2.1 states that the BESS would be constructed in two distinct phases, with civil works and the balance of non-BESS plant and equipment commenced initially, with the BESS equipment delivered to be installed at “a suitable point”. The Applicant should confirm that the initial phase would include all drainage and firewater containment infrastructure, and that the battery storage infrastructure would not be delivered to site before all firewater containment arrangements are installed and commissioned. Section 4.2.2 confirms	The Applicant confirms that the BESS installation phase would not commence until the required firewater management and containment infrastructure serving the BESS compound is installed and operational. The initial civil works phase includes the formation of the compound and the provision of the sealed and isolatable drainage and containment system, together with associated firewater management infrastructure, prior to the delivery and installation of battery units. In accordance with Section 4.2.2 of the **Outline Battery Safety Management Plan [APP-286]**, installation of battery storage equipment would not take place

			that “installation would not take place until practical provisions were completed such as the water tanks being installed and filled for use in an emergency”.	until practical provisions are completed, including the installation and commissioning of the relevant firewater and emergency infrastructure. On that basis, battery storage infrastructure would not be delivered to site for installation before the containment arrangements required to manage spills and firefighting water are in place and operational.
EA-085	Hydrology, Flood Risk and Drainage	Groundwater and Contaminated Land	Document / Section: APP-286 7.21 Section 4.3.1 and Section 5.4 The Emergency Response Plan (ERP) should identify the importance of notifying downstream river/groundwater abstractors should impacts to surface water and/or groundwater occur, to ensure that Environment Agency incident response personnel are made aware of this as a priority. All relevant incident response parties should be made aware of the ERP and provided with immediate access to it.	The Applicant agrees. The Applicant will update **Outline Battery Safety Management Plan [APP-286]** to ensure the Emergency Response Plan drafted at detailed design when the BESS system is selected, explicitly includes priority notification and escalation where an incident could affect surface water or groundwater, including notification of the Environment Agency and, where applicable, downstream receptors such as abstractors. The Applicant will also confirm that relevant incident response parties will be made aware of the ERP and have immediate access to it. The Applicant will update the relevant application documents as set out above.
EA-086	Hydrology, Flood Risk and Drainage	Groundwater and Contaminated Land	Document / Section: APP- 291 7.26 Commitments Register Hydrology, Flood Risk and Drainage and Ground Conditions and Contamination The Applicant states “Flexibility for tracker or fixed Solar PV Panels has been built into the design with foundations likely to be galvanised steel poles driven into the ground. These will either be piles rammed	A requirement for a Piling Risk Assessment is secured through the **Outline Construction Environmental Management Plan (CEMP) [APP-277]**. The Piling Risk Assessment will assess the risks posed by piling and other penetrative ground improvement methods, including those associated with Solar PV panel foundations, in line with

			directly into the ground or rammed into a pre-drilled hole, or a pillar attaching to a steel ground screw depending on ground conditions" and "Driven screw pile or post foundations are strongly preferred in the final design, which minimise soil displacement, waste and general impacts on soils and groundwater. In areas where archaeological protection is required, concrete feet or other non-ground penetrative techniques would be used" The application of a Piling Risk Assessment should also be stated in these sections as these may introduce new migration pathways for surface and near surface contamination.	the CL:AIRE guidance Piling and Penetrative Ground Improvement Methods on Land Affected by Contamination: Guidance on Pollution Prevention. The measures set out within the **Outline CEMP [APP-277]** ensure that risks to soils and groundwater from piling and foundation installation are appropriately identified and managed prior to construction. The **Outline CEMP [APP-277]** is secured by a requirement in Schedule 2 of the **Draft Development Consent Order [APP-016]**, which requires a detailed CEMP to be submitted to and approved by the relevant planning authority prior to construction, to be substantially in accordance with the **Outline CEMP [APP-277]**, and for construction works to be carried out in accordance with the approved CEMP.
EA-087	Hydrology, Flood Risk and Drainage	Groundwater and Contaminated Land	Document / Section: APP- 291 7.26 Commitments Register Hydrology, Flood Risk and Drainage The Applicant states "Where trenchless crossing techniques such as HDD are used, appropriate environmental controls will be implemented" The statement is vague and should provide more detail.	The Applicant notes the comment. The commitment in **Commitments Register [APP-291]** will be updated to cross refer to the relevant pollution prevention and water quality control measures in **Outline Construction Environmental Management Plan [APP-277]**, which set out the environmental controls that will be applied to trenchless crossings including HDD.
EA-088	Hydrology, Flood Risk and Drainage	Groundwater and Contaminated Land	Document / Section: APP- 291 7.26 Commitments Register Hydrology, Flood Risk and Drainage The Applicant states "Construction compounds and stockpiles would be located as far from receptors as possible" This should clearly include sensitive	The Applicant notes the comment. The relevant commitment in **Commitments Register [APP-291]** will be updated to confirm that the siting of construction compounds and stockpiles will take account of sensitive groundwater and ecological receptors as well as surface

			groundwater and ecological receptors as well as surface water receptors.	water receptors, with a cross reference to the relevant control measures in **Outline Construction Environmental Management Plan [APP-277].**
EA-089	Hydrology, Flood Risk and Drainage	Groundwater and Contaminated Land	Document / Section: APP- 291 7.26 Commitments Register Hydrology, Flood Risk and Drainage The Applicant states “Plant to be in good working order, kept clean and fitted with drip trays where appropriate” This should also reference the use of Plant Nappies where appropriate.	The Applicant notes the comment. The relevant commitment in **Commitments Register [APP-291]** will be updated to reference the use of plant nappies where appropriate, with a cross reference to the relevant pollution prevention measures in **Outline Construction Environmental Management Plan [APP-277]**.

EA-090	Hydrology, Flood Risk and Drainage	Groundwater and Contaminated Land	Document / Section: APP- 291 7.26 Commitments Register Hydrology, Flood Risk and Drainage and Ground Conditions and Contamination The Applicant states “Where HDD is used, a breakout contingency procedure will be included in the detailed CEMP to manage accidental releases of drilling fluid, including immediate containment and clean-up measures” and “Where trenchless techniques are used, appropriate mitigation, such as measures to be included in a drilling fluid breakout plan. All trenchless activity would be carried out in line with guidance contained in BS5930: 2015 Code of Practice for Ground Investigations and BS EN 16228-3 Drilling and foundation equipment – Safety – Part 3: Horizontal directional drilling equipment” Appendix 3-2 Cable Route Construction Method Statement Section 1.8.2 identifies proposed products to be used as drilling fluids, which the Safety Data Sheets indicate can pose a hazard to the water environment. The commitment should confirm that the risks posed by drilling fluids will be assessed and managed in the trenchless drilling management plans. A spill response plan should also be included in the detailed CEMP to manage spillage containment and cleanup at surface outside the context of fluid breakout during drilling activities. This should also reference the preparation of a Water Features Survey and Hydrogeological Risk Assessment at proposed surface water crossings and	The commitments already secure breakout contingency procedures and trenchless working in accordance with relevant standards. To address the Environment Agency’s request for additional clarity, the Applicant will update **Commitments Register [APP-291]** to explicitly confirm that trenchless drilling management plans will assess and manage drilling fluid risks, including drilling fluid selection, measures to prevent loss to the water environment and breakout contingency procedures.

			beneath Groundwater Dependent Terrestrial Ecosystems, and for Hydrogeological Risk Assessment where HDD or other trenchless methods are anticipated to be in contact with groundwater within Primary or Secondary A aquifers.	
EA-091	Hydrology, Flood Risk and Drainage	Groundwater and Contaminated Land	Document / Section: APP- 291 7.26 Commitments Register Ground Conditions and Contamination The Applicant states “All photovoltaic arrays/panels will be certified as PFAs free.” A minor typo “PFAS” should be corrected. We encourage the Applicant to ensure that all cabling, particularly buried cabling which may ultimately be retained on site, is also certified as PFAS free.	The Applicant acknowledges the Environment Agency’s concerns regarding the potential use of per- and polyfluoroalkyl substances (PFAS) in underground cabling and appreciates the opportunity to provide clarification. The Applicant is not able to commit to exclusively PFAS-free materials within the underground cabling. While PFAS-free cable insulation products such as cross-linked polyethylene (XLPE) are commercially available, PFAS can still be present in essential ancillary components integral to cable manufacture and

				installation. These may include tapes, lubricants, protective jackets, or other minor components for which PFAS-free alternatives are either not technically feasible or not currently available. As a result, guaranteeing PFAS-free materials across the entirety of the scheme is not considered possible. As outlined in the **Outline Decommissioning Strategy [APP-279]** submitted with the application, flexibility has been intentionally maintained regarding the approach to cable decommissioning. Current industry good practice indicates that the most environmentally acceptable option is typically to leave cables in situ at the end of their operational life, as this avoids unnecessary soil disturbance and associated impacts. However, the final approach will remain subject to prevailing government policy, regulatory guidance, and best practice at the time of decommissioning. Should removal of the cables and associated ducting be deemed the most appropriate option at that time, this remains feasible. The Applicant will undertake an assessment at the time of decommissioning to determine the balance of environmental impacts between removing the cables and leaving them in situ. This will include consideration of soil disturbance, potential environmental effects, and up-to-date policy and guidance, including any emerging requirements in relation to PFAS management. The agreed

				approach will be secured through the Decommissioning Strategy, which will be prepared and submitted for approval by the relevant local authority prior to decommissioning.
EA-092	Hydrology, Flood Risk and Drainage	Groundwater and Contaminated Land	Document / Section: APP- 291 7.26 Commitments Register Ground Conditions and Contamination The Applicant states “Within the BESS Area and substation sites featuring potential fire risk, installations will be bunded to retain firefighting substances used to control fire.” The statement should also confirm that the BESS and substation drainage infrastructure will be lined and impermeable, and that the drainage system will be able to be sealed by an automatically actuated valve with backup manual operation, and that all potentially contaminated firewater runoff would be contained pending testing. The statement should also clearly include that following a fire event the drainage system would be decontaminated, including removal or cleaning of impacted granular drainage substrate, and demonstrated to be clean prior to resuming operation.	The Applicant will also update the **Commitments Register [APP-291]** to explicitly confirm that the detailed **Construction Environmental Management Plan (CEMP)** will include a spill response plan for surface spills outside drilling fluid breakout scenarios, and that proportionate, location specific groundwater sensitivity and receptor considerations will be applied where trenchless works could interact with groundwater in sensitive aquifers. No update to the **Outline Construction Environmental Management Plan (CEMP) [APP-277]** is required. The Applicant confirms the principle that BESS drainage will be designed to be sealed and isolatable so that any potentially contaminated runoff, including firewater, is retained and managed without uncontrolled discharge to ground. This is consistent with the assessed approach to controlled waters protection set out in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [APP-063]**. Moreover, the Applicant will update the **Outline Battery Safety Management Plan [APP-286]** to include

				an explicit inspection, maintenance and periodic functional testing schedule for relevant BESS drainage components, including provision for manual operation where required.
EA-093	Hydrology, Flood Risk and Drainage	Groundwater and Contaminated Land	Document / Section: APP- 291 7.26 Commitments Register Ground Conditions and Contamination The Applicant states “Where unexpected contamination is encountered, a hydrological risk assessment would be undertaken. If necessary, material would be removed in line with the Discovery and Inspection Strategy.” It is not clear whether this is intended to refer to a hydrological risk assessment (i.e. relating to surface water) or a hydrogeological risk assessment (i.e. relating to groundwater). Removal may not be the best option for management of unexpected contamination.	For clarity, the reference to a “*hydrological risk assessment*” within the Commitments Register is intended to refer to a hydrogeological risk assessment, relating to potential risks to groundwater. This clarification has been reflected in an updated version of the **Commitments Register [APP-291]**, which has been submitted into the Examination at Deadline 1.

EA-094	Hydrology, Flood Risk and Drainage	Groundwater and Contaminated Land	Document / Section: APP- 291 7.26 Commitments Register Ground Conditions and Contamination The Applicant states “Ground investigation would be deployed within the Cable Corridor Southwest to identify the presence of any unrecorded mine workings, shafts etc.” The Preliminary Risk Assessments recommend ground investigation in several locations across the Proposed Development area, not just the proposed substations and Southern Cable Corridor. This commitment should be updated to reflect all proposed intrusive site characterisation.	Ground investigation prior to the commencement of construction is secured through the **Outline Construction Environmental Management Plan (CEMP) [APP-277]** and is applicable to the entire Scheme, not limited to a single cable corridor or asset. The CEMP provides the mechanism through which intrusive investigation will be undertaken where required to address geohazards and potential contamination in line with the findings of the PRAs. The approach to managing unexpected contamination is set out within the **Outline CEMP [APP-277]**, which includes a Discovery and Inspection Strategy. This provides for appropriate, risk based assessment and management of unexpected contamination encountered during construction and does not prescribe a single remediation outcome. The measures within the **Outline CEMP [APP-277]** are secured by a requirement in Schedule 2 of the **Draft Development Consent Order [APP-016],** which requires a detailed CEMP to be submitted to and approved by the relevant planning authority prior to construction and for works to be carried out in accordance with the approved CEMP.

3.2 Historic England

Table 3-2 RR-1880

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
HE-001	Description and DCO Process	Historic England Representation	The Historic Buildings and Monuments Commission for England (HBMCE) is better known as Historic England, and we are the Government's adviser on all aspects of the historic environment in England, including historic buildings and areas, archaeology and historic landscapes. We have a duty to promote conservation, public understanding and enjoyment of the historic environment. We are an executive Non-Departmental public body and we answer to Parliament through the Secretary of State for Culture, Media and Sport (DCMS).	The Applicant notes this comment.
HE-002	Description and DCO Process	Proposal	The proposal, Lime Down Solar Project, comprises the construction of a Solar Farm and Battery Energy Storage System (BESS) area that would allow for the generation, export and storage of electricity exceeding 50 MW. The project include works to facilitate the construction, operation, maintenance and decommissioning of a solar photovoltaic (PV) array electricity generating facility and BESS including PV modules and mounting structures, on-site supporting equipment including inverters, transformers and switchgears, on-site substations and underground cabling to connect to the National Grid substation, associated infrastructure including fencing, drainage and storage containers, local road junction improvements and biodiversity and landscaping	The Applicant notes this comment.

			enhancement measures. The proposal is sited within the Unitary Authority of Wiltshire Council, some of the road improvement works are within the Unitary Authority of South Gloucestershire Council.	
HE-003	Description and DCO Process	Representation	We have been engaged in positive pre-application discussion with the applicant and have provided comments (19 March 2025) on the Preliminary Environmental Impact Report (Section 42). The following comments set out representation based upon the information submitted to date. We look forward to further constructive engagement with the applicant. The applicant has outlined a series of issues Historic England have identified through our pre-application involvement with the proposal. These are set out within Table 2-3 of the Potential Main Issues for Examination (Doc Ref APP/7.24).	The Applicant welcomes Historic England's comments and will continue constructive engagement.

HE-004	Cultural Heritage	Bradfield Manor Farmhouse	We have reviewed the setting impacts in respect of highly graded designated heritage assets. The main impact is to one highly graded asset Bradfield Manor, Grade II* Listed Building. The core of the Manor is a 15th century medieval hall, although it is likely there was an earlier house here predating the existing. The panels will be in the field immediately north of the Manor and potentially visible from a principal window and designed view from the house. Following a site visit and initial discussions regarding the impacts the panels are now set back from the field boundary with additional planting to mitigate the impact.	The Applicant notes Historic England's comments in relation to Grade I Listed Bradfield Manor Farmhouse (NHLE: 1198808). **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, supported by **ES Volume 3, Appendix 12-1: Heritage Statement [APP-219]** and **ES Volume 3, Appendix 12-8: Cultural Heritage Impact Assessment Tables [APP-232]**, identified that there would be a moderate / minor (not significant) adverse effect to the asset (less than substantial harm at the lower end in NPPF terms) as a result of indirect (i.e. setting) impacts. Site visits were undertaken with Historic England on the 28th March 2025 and 22nd May 2025, which included a visit to the grounds of Bradfield Manor Farmhouse (see Table 12-2 in **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**). Feedback provided during the site visits was used to inform the Scheme design and assessment provided in **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**. The Scheme design was amended to increase the setback of panels away from the south edge of Field D5 (by removing Solar PV Panels from the southernmost part of the Field D5 which is the field nearest Bradfield Manor Farmhouse) and enhanced screening is proposed along existing hedgerows.
HE-005	Cultural Heritage	Bradfield Manor	Visualisations showing the panels from the identified window were requested to be submitted with the application to help us better understand the impact on the	The Applicant notes Historic England's comments regarding additional visualisations and will look to

			significance of the highly designated heritage asset. These have not been provided within the submitted documentation.	produce these additional visualisations by May 1 at Deadline 1.
HE-006	Cultural Heritage	Bradfield Manor	We still require the visualisations to demonstrate what would be visible from Bradfield Manor. This does not necessarily require the profiles of the individual PV panels themselves to be modelled, more the areas of land visible from the Manor that would include the proposed development. This would also provide us with a greater degree of certainty to the effectiveness of the proposed mitigation measures in terms of planting. We would then be able to advise further and suggest any additional amendments or mitigation that would minimise or remove the harm.	The Applicant notes Historic England's comments regarding additional visualisations and will look to produce these additional visualisations at Deadline 1.
HE-007	Cultural Heritage	Archaeology	In our previous response to the Section 42 PEIR Consultation we outlined the documentation we expected to see submitted with the application, these were: Detailed impact assessments for designated heritage assets that may be affected by the proposals (Historic England would review impacts on the highly graded assets within our remit)	No direct impacts have been identified to designated assets. Identified impacts to designated assets would be indirect and would be a matter of impacts on setting. **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, supported by **ES Volume 3, Appendix 12-1: Heritage Statement [APP-219]** and **ES Volume 3, Appendix 12-8: Cultural Heritage Impact Assessment Tables [APP-232],** assesses the impacts to designated heritage assets that have the potential to be affected by the Scheme.
HE-008	Landscape and Visual	Archaeology	Results of archaeological evaluation with assessment of the significance of remains	Interim trial trenching reports were submitted as part of the DCO Application **(ES Volume 3, Appendix 12-5: Interim Evaluation Trial Trenching Reports Parts 1-5 [APP-225 to APP-229])** and full trial trenching reports will be submitted, in advance of

				determination of the Application by the Secretary of State. An interim geophysical survey report of the Cable Route Corridor was submitted as part of the DCO Application **(ES Volume 3, Appendix 12-4b Archaeological Geophysical Survey Report – Cable Route Corridor [APP-224])** and a full report covering the geophysical survey of the Cable Route Corridor will be submitted, in advance of determination of the Application by the Secretary of State. The assessment of the significance of any remains is detailed in **ES Volume 1, Chapter 12: Cultural Heritage [APP-064].**
HE-009	Cultural Heritage	Archaeology	Draft Archaeological Mitigation Statement	An Outline Archaeological Mitigation Strategy was submitted as part of the DCO Application **(ES Volume 3, Appendix 12-6: Outline Archaeological Mitigation Strategy [APP-230])**. A description of the purpose of the Outline Archaeological Mitigation Strategy is set out in the response below.
HE-010	Cultural Heritage	Archaeology	Overarching Written Scheme of Investigation.	As stated in Paragraph 1.1.2 of the **Outline Archaeological Mitigation Strategy (ES Volume 3, Appendix 12-6: Outline Archaeological Mitigation Strategy [APP-230])**, the Outline AMS provides an overarching methodology for undertaking a programme of archaeological mitigation within the Scheme. Written Schemes of Investigations (WSIs) that detail site-specific mitigation measures will be appended to the Outline AMS in advance of each phase of mitigation works.

				This is further secured by Requirement 12 of the draft **Development Consent Order [APP-016]** which states that no part of the Proposed Development can commence until the WSI for that part has been submitted to and approved by the relevant planning authority. The WSIs must be substantially in accordance with the Outline AMS and must be implemented as approved.
HE-011	Ecology and Biodiversity	Archaeology	Details on off-site ecology and biodiversity net gain mitigation proposals	The **Outline Landscape and Ecological Management Plan [APP-283]** details ecological mitigation and indicative locations are shown on the **6.2 Environmental Statement Volume 2, Figure 3-4-1 to 3-4-5.2 Landscape and Ecology Mitigation Plan [APP-084]**. Ecological mitigation that may affect archaeological remains is covered in Table 6.1.1 of the **ES Volume 3, Appendix 12-6: Outline Archaeological Mitigation Strategy [APP-230].** The Applicant also refers to the **Biodiversity Net Gain Assessment Report [APP-273]** which, together with **Plates 8-12** in that document and **ES Volume 2, Figure 3-4-1 to 3-4-5.2: Landscape and Ecology Mitigation Plan [APP-084]**, sets out the habitat creation, mitigation and enhancement measures that will be implemented to achieve biodiversity net gain for the Scheme.
HE-012	Cultural Heritage	Archaeology	The submitted documentation in support of Chapter 12 of the Environmental Statement (ES) (APP/6.1) includes assessments of the designated assets which covers our first point.	The Applicant agrees.

HE-013	Cultural Heritage	Archaeology	There are Interim evaluation reports (ES Volume 3: Appendix 12-5 APP/6.3) but these do not include a final analysis of the sites and their significance. There are still outstanding geophysical surveys for the cable route. These will need to be completed and agreed prior to the final Mitigation Statement being agreed.	The Applicant notes the comment. Interim trial trenching reports were submitted as part of the DCO Application **(ES Volume 3, Appendix 12-5 Interim Evaluation Trial Trenching Reports Part 1–5 [APP-225 to APP-229])** and full trial trenching reports will be submitted, in advance of determination of the Application by the Secretary of State. An interim geophysical survey report of the Cable Route Corridor was submitted as part of the DCO Application **(ES Volume 3, Appendix 12-4b Archaeological Geophysical Survey Report – Cable Route Corridor [APP-224])** and a full report covering the geophysical survey of the Cable Route Corridor will be submitted, in advance of determination of the Application by the Secretary of State. The final reports will be submitted at Deadline 2 and will be used to inform the Outline AMS, which will be submitted in advance of determination of the Application by the Secretary of State.
HE-014	Cultural Heritage	Archaeology	There is an Outline Archaeological Mitigation Strategy (OAMS Doc Ref ES Volume 3: Appendix 12-6 APP/6.3), which is another name for the DAMS. It also includes an overarching Project Design/ Written Scheme of Investigation (OWSI). It is our view that the OMS should be a separate document to the OWSI.	As stated in Paragraph 1.1.2 of the **ES Volume 3, Appendix 12-6: Outline Archaeological Mitigation Strategy [APP-230]**, the Outline AMS provides an overarching methodology for undertaking a programme of archaeological mitigation within the Scheme. Written Schemes of Investigations (WSIs) that detail site-specific mitigation measures will be appended to the AMS in advance of each phase of mitigation works.

				This is further secured by Requirement 12 of the draft **Development Consent Order [APP-016]** which states that no part of the Proposed Development can commence until the WSI for that part has been submitted to and approved by the relevant planning authority. The WSIs must be substantially in accordance with the Outline AMS and must be implemented as approved. The Applicant considers that this approach appropriately secures the programme of archaeological mitigation within the Scheme and does not intend to submit a separate Outline WSI.
HE-015	Ecology and Biodiversity	Ecology BNG	There is also no offsite ecology BNG. All ecology mitigation is within the order limits and are dealt with in the Outline Landscape and Ecological Management Plan (OLEMP) (APP/7.18), Outline Construction Environmental Management Plan (OCEMP) (APP/7.12) and Outline Operational Environmental Management Plan (OOEMP) (APP/7.13).	The **Outline Landscape and Ecological Management Plan [APP-283]** details ecological mitigation and indicative locations are shown on the **ES Volume 2, Figure 3-4-1 to 3-4-5.2 Landscape and Ecology Mitigation Plan [APP-084]**. Ecological mitigation that may affect archaeological remains is covered in Table 6.1.1 of the **ES Volume 3, Appendix 12-6: Outline Archaeological Mitigation Strategy [APP-230]**. The Applicant also refers to the **Biodiversity Net Gain Assessment Report [APP-273]** which, together with **Plates 8-12** in that document and **ES Volume 2, Figure 3-4-1 to 3-4-5.2: Landscape and Ecology Mitigation Plan [APP-084]**, sets out the habitat creation, mitigation and enhancement measures that will be

				implemented to achieve biodiversity net gain for the Scheme.
HE-016	Ecology and Biodiversity	Ecological Mitigation	There needs to be better cross referencing of the areas without solar development to understand what ecological mitigation is proposed. Within Table 6.1.1, of the OAMS, under the Mitigation Type column the proposed ecological mitigation needs to be listed: e.g. wildflower meadow, wet grassland, etc. Some ecological mitigation may require below ground impacts and the OAMS needs to be clear on what those are if there are any.	The Applicant acknowledges the comment and can make this clearer within the **ES Volume 3, Appendix 12-6: Outline Archaeological Mitigation Strategy [APP-230]**.
HE-017	Cultural Heritage	OCEMP	The OCEMP also needs to be better cross referenced for the mitigation works proposed for Ecology and Cultural Heritage. For example, under Ecology and Biodiversity Table 3, construction personnel will be given a toolbox talk to ensure there is no damage to habitats. There is no similar Toolbox talk for Cultural Heritage Table 6. As these areas generally overlap, across the scheme, the Toolbox Talk should include Archaeology as well as ecology.	The Applicant acknowledges the comment and is seeking clarification on the exact updates to documents that Historic England is requesting.
HE-018	Ecology and Biodiversity	Archaeology	Both the CEMP and the OEMP reference an Archaeological Clerk of Works (ACOW), but this role is not listed in 2.1 Roles and Responsibilities of the CEMP. An Archaeological Project Officer is listed and the role description is that of an ACOW. This role needs to be confirmed as the ACOW.	The Applicant acknowledges Historic England's request for an ACOW to be included in the roles and responsibilities. The Applicant will discuss the roles, detailed in the **Outline Construction Environmental Management Plan [APP-277]** and **Outline Operational Environmental Management Plan [APP-278]** with Historic England.

HE-019	Cultural Heritage	Archaeology	Historic England had also highlighted potential issues with the Horizontal Direct Drilling and impacts on archaeology. This issue is dealt with within the OAMS (7.3.4). A final decision on whether this technique will be used has not yet been made. The results of the additional geophysics and trial trenching along the Cable Route will inform that decision.	The Applicant notes Historic England potential issues with Horizontal Direct Drilling and impact on Archaeology has been resolved in the **ES Volume 3, Appendix 12-6: Outline Archaeological Mitigation Strategy [APP-230]**. The Outline AMS provides an appropriate and proportionate framework for managing archaeological impacts including the approach to mitigating impacts as a result of cabling, including the potential use of horizontal directional drilling (HDD).
HE-020	Cultural Heritage	Draft DCO	As submitted, the draft DCO requirement 12 reads as follows:- Archaeology 12 (1) The authorised development must not be commenced until a programme of archaeological investigation has been carried out in accordance with the outline archaeological mitigation strategy. (2) No part of the authorised development may be commenced until a written scheme of investigation for that part has been submitted to and approved by the relevant planning authority. (3) The written scheme of investigation must be substantially in accordance with the outline archaeological mitigation strategy. (4) The written scheme of investigation must be implemented as approved. It is Historic England's view that this requirement does not fully secure the required processes to ensure the buried archaeology is dealt in the appropriate manner. We suggest the following changes:	The Applicant notes these comments and the accompanying change requests. The Applicant considers that the current drafting in Requirement 12 and **ES Volume 3, Appendix 12-6: Outline Archaeological Mitigation Strategy [APP-230]** appropriately secures the programme of archaeological mitigation within the Scheme. However, the Applicant acknowledges the comments and will discuss the wording of the draft DCO Requirement 12 with Historic England during examination and the Statement of Common Ground process.

			(1) No part of the authorised development is to commence until for that part a site-specific written scheme of investigation for each area and each phase (evaluation or detailed excavation, SMR, or watching brief), has been prepared in accordance with the OAMS in consultation with the relevant planning authority, agreed with the County Archaeologist in consultation with Historic England. (2) The authorised development must be carried out in accordance with the OAMS and site-specific written schemes of investigation referred to in sub-paragraph (1). (3) A programme of archaeological reporting, post excavation and publication required as part of the OAMS and site – specific written schemes of investigation referred to in subparagraph (1) must be agreed with the County Archaeologist in consultation with Historic England and implemented within a timescale agreed with the County Archaeologist and the report deposited with the Historic Environment Record of the relevant planning authority within (to be agreed with LPA) years of the date of completion of the authorised development or such other period as may be agreed in writing by the relevant planning authority. (4) Any archaeological remains not previously identified which are revealed when carrying out the authorised development must be— (a) retained in situ and reported to the County Archaeologist as soon as reasonably practicable; and (b) subject to appropriate	

			mitigation as set out in the OAMS and mitigation agreed with the County Archaeologist. (5) Prior to commencement of the authorised development, suitable resources and provisions for long term storage of the archaeological archive must be agreed with the County Archaeologist.	
HE-021	Cultural Heritage	Archaeology	Historic England also have concerns with Schedule 2 Requirement 18 Removal of Human Remains. Any Human remains uncovered within the Order Limits will generally be archaeological (over 100 years old). These remains will be dealt with as outlined within the OAMS (7.10) by the archaeological contractor. Any remains uncovered that are less than 100 years old will be reported by the archaeologist to the Coroner for removal. This requirement in our view is therefore not needed or needs to be reworded to ensure burials of more than 100 years are dealt with by the archaeologist as set out in the OAMS.	The Applicant acknowledges the comment and agrees that any human remains identified within the Order Limits that are over 100 years old (i.e. archaeological) should be dealt with in accordance with the relevant sections of **ES Volume 3, Appendix 12-6: Outline Archaeological Mitigation Strategy [APP-230]**. However, the Applicant does not agree that Article 18 of the draft **Development Consent Order [APP-016]** should be deleted or needs to be reworded to enable this to occur. The **Explanatory Memorandum [APP-017]** explains that Article 18 has been included in the draft **Development Consent Order [APP-016]** because there is a risk of human remains associated within the Order Limits identified by the undertaker in the course of its archaeological investigations (these findings are summarised in the **ES Volume 3, Appendix 12-6: Outline Archaeological Mitigation Strategy [APP-230]**, along with the proposed archaeological mitigation in respect of each are where burial features have been

				identified). The undertaker is not able to rule out the presence of human remains within the Order Limits. This provision is considered necessary so that the discovery of any remains does not delay the implementation of the Authorised Development (as defined in the draft **Development Consent Order [APP-016]**). The article operates by permitting the undertaker to remove human remains that were interred more than 100 years ago and where no personal representative or relative is likely to object, before seeking instructions from the Secretary of State as to the reinterment of the remains. For any remains interred less than 100 years ago, the process for publishing notices and according with the wishes of the deceased personal representative or relatives is set out in the article. In the absence of this article, where human remains are identified, the Applicant must comply with section 25 of the Burial Act 1857. In practice, this means that construction activity in the area where remains have been identified must stop whilst the Applicant applies to the Secretary of State for instructions for the removal of the human remains and subsequent reinterment. It is considered preferable for the Secretary of State to include instructions as to the removal of any identified human remains within the DCO in order that such a discovery does not delay the

				implementation of the Scheme. This is considered appropriate as the **ES Volume 3, Appendix 12-6: Outline Archaeological Mitigation Strategy [APP-230]** makes detailed provision for the removal of archaeological remains. In the event human remains are not archaeological in nature, the Applicant will be able to commence the process of advertising for the deceased personal representatives or relatives without delay. This article has precedent in the A303 (Amesbury to Berwick Down) Development Consent Order 2023, in the context of extensive historical burial grounds in the vicinity of Stonehenge, and appears in DCOs for solar projects where the potential for human remains has been identified, as in the case of this project, through archaeological surveys of the Order Limits, including the Cottam Solar Project Order 2024. The Scheme is critical national priority infrastructure and Article 18 ensures that the discovery of a historic burial can be dealt with appropriately and efficiently, in accordance with the **ES Volume 3, Appendix 12-6: Outline Archaeological Mitigation Strategy [APP-230]**.
HE-022	Cultural Heritage	Engagement	Historic England will continue to work with Lanpro to resolve these concerns through the Statement of Common Ground.	The Applicant welcomes this comment.
HE-023	Cultural Heritage	Detailed comments on OAMS	1.1.2 It needs to be clear that the SSWSIs will be written by the Archaeological contractor with reference back to an Overarching WSI/ OAMS	The Applicant will look to discuss comments on the **ES Volume 3, Appendix 12-6: Outline Archaeological Mitigation Strategy [APP-230]** with Historic England and will update the

				AMS to acknowledge the submission of SSWSIs.
HE-024	Cultural Heritage	Detailed comments on OAMS	7.8.5 – Needs updating with most recent Treasure Act – all finds are now reported to the Finds Liaison Officer and not the coroner. The Treasure (Designation) (Amendment)Order 2023 Section E: Reporting and depositing finds in England (17-21)	The Applicant will look to discuss comments on the **ES Volume 3, Appendix 12-6: Outline Archaeological Mitigation Strategy [APP-230]** with Historic England and will update section 7.8.5 of the AMS where possible in line with Historic England's guidance.
HE-025	Cultural Heritage	Detailed comments on OAMS	7.3.3 Use of piles or concrete feet needs to be agreed once final details of the evaluation trenching is submitted and agreed with Local Authority Archaeologist. Suitable ground protection will be needed in wet weather to prevent rutting and damage to the underlying archaeology.	The Applicant will look to discuss comments on the **ES Volume 3, Appendix 12-6: Outline Archaeological Mitigation Strategy [APP-230]** with Historic England and will update section 7.3.3 of the AMS where possible in line with Historic England's guidance.
HE-026	Cultural Heritage	Detailed comments on OAMS	Table: Within Table 6.1.1: Archaeological Mitigation Strategies - it states that earthworks of ridge and furrow will be reinstated. Detail on how this will be achieved is needed.	The Applicant will look to discuss comments on the **ES Volume 3, Appendix 12-6: Outline Archaeological Mitigation Strategy [APP-230]** with Historic England and will update the AMS where possible. A SSWSI would be produced that outlines the methodology for the reinstatement and will be agreed with Historic England before works.
HE-027	Cultural Heritage	Detailed comments on OAMS	7.9 Paleoenvironmental Sampling: The SSWSIs need to include a sampling strategy written by the contractor's specialist with reference to the research questions. This targets sampling to those deposits most likely to answer the research questions and limits the taking of unnecessary samples.	The Applicant will look to discuss comments on the **ES Volume 3, Appendix 12-6: Outline Archaeological Mitigation Strategy [APP-230]** with Historic England and will update the Paleoenvironmental Sampling of the AMS where possible in line with Historic England's guidance.

HE-028	Cultural Heritage	Detailed comments on OAMS	7.11.2 and where of greater and potentially of national significance Historic England need to be contacted.	The Applicant will look to discuss comments on the **ES Volume 3, Appendix 12-6: Outline Archaeological Mitigation Strategy [APP-230]** with Historic England and will update section 7.11.2 of the AMS where possible in line with Historic England's guidance.
HE-029	Cultural Heritage	Detailed comments on OAMS	8.6 needs to be clear about when assessment reports are being produced, at the end of each phase of works? Or at the end of the field work? It is our view that as each phase of works is completed an assessment (Grey Literature) report is produced and submitted for approval. Then at the end of the project these reports are collated into one Assessment report and UPD for publication.	The Applicant will look to discuss the production of assessment reports with Historic England and will look to identify an appropriate phasing for the production of reports, and as needed will update **ES Volume 3, Appendix 12-6: Outline Archaeological Mitigation Strategy [APP-230]**
HE-030	Cultural Heritage	Detailed comments on OAMS	11.1.4 Deed of Transfer forms should be included with the SSWSI's in line with current proposals from Collections Trust and Historic England Toolkit for managing the ownership of archaeological finds in England - draft - Collections Trust	The Applicant will look to discuss with Historic England, whether the AMS should be updated with the Toolkit for managing the ownership of archaeological finds in England prior to the toolkit being finalised.
HE-031	Cultural Heritage	Detailed comments on OAMS	16 Communication – Will Lanpro be acting as an Archaeological Clerk of Works for the project?	The ACOW will be identified prior to the mitigation works commencing.
HE-032	Cultural Heritage	Detailed comments on OAMS	19 References: Guidance needs checking as many quoted have been updated (Refs: 13, 15, 29, 38, 48) or are no longer in use (Refs: 24, 25). Also there is no reference to Preserving Archaeological Remains or Piling and Archaeology, both of which are being proposed for this project.	The Applicant will look to update guidance references within the AMS following discussion with Historic England

3.3 Natural England

Table 3-3 RR-3427

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
NE-001	Description and DCO Process	Introduction	1. Natural England's advice in these relevant representations is based on information submitted by Lime Down Solar Park Limited in support of its application for a Development Consent Order ('DCO') in relation to Lime Down Solar Park ('the project').	The Applicant notes this comment.
NE-002	Description and DCO Process	Introduction	2. Part I of these representations summarises what Natural England considers the main issues to be in relation to the DCO application, and indicate the principal submissions that it wishes to make at this point. Natural England will develop these points further as appropriate during the Examination process. Natural England may have further or additional points to Wiltshire hosts a large make, particularly if further information about the project becomes available.	The Applicant notes this comment.
NE-003	Ecology and Biodiversity	Introduction	3. Our comments are set out against the following sub-headings which represent our key areas of remit: • Internationally designated sites • Nationally designated sites • Nationally designated landscapes	The Applicant notes this comment.
NE-004	Soils and Agriculture	Introduction	• Soils and best and most versatile agricultural land	The Applicant notes this comment.
NE-005	Ecology and Biodiversity	Introduction	• Protected species	The Applicant notes this comment.

NE-006	Description and DCO Process	Introduction	4. Our comments are flagged as red, amber or green: a. Red are those where there are fundamental concerns which it may not be possible to overcome in their current form. b. Amber are those where further information is required to determine the effects of the project and allow the Examining Authority to properly undertake its task and or advise that further information is required on mitigation/compensation proposals in order to provide a sufficient degree of confidence as to their efficacy. c. Green are those which have been successfully resolved (subject always to the appropriate requirements being adequately secured).	The Applicant notes this comment.
NE-007	Description and DCO Process	Engagement	5. Natural England has been working closely with Lime Down Solar Park Limited to provide advice and guidance since January 2024.	The Applicant notes this comment.
NE-008	Description and DCO Process	Summary	6. Part I of these representations provides an overview of the issues and a summary of Natural England's advice. Section 2 identifies the natural features relevant to this application. Section 3 summarises Natural England's overall view of the application and the main issues which it considers need to be addressed by the Secretary of State.	The Applicant notes this comment.
NE-009	Description and DCO Process	Summary	7. Part II of these representations sets out all the significant issues which remain outstanding, and which Natural England advises should be addressed by Lime Down Solar Park Limited and the Examining Authority as part of the examination process in order to ensure that the project can properly be consented. These are primarily issues on which further information would	The Applicant notes this comment.

			be required in order to allow the Examining Authority properly to undertake its task or where further work is required to determine the effects of the project to provide a sufficient degree of confidence as to their efficacy.	
NE-010	Description and DCO Process	Engagement	8. Natural England will continue discussions with Lime Down Solar Park Limited to seek to resolve these concerns and agree outstanding matters in a Statement of Common Ground. Failing satisfactory agreement, Natural England advises that the matters set out in Section 4 will require consideration by the Examining Authority as part of the examination process.	The Applicant notes this comment.
NE-011	Description and DCO Process	Examination	9. The Examining Authority may wish to ensure that the matters set out in these relevant representations are addressed as part of the Examining Authority's first set of questions to ensure the provision of information early in the examination process.	The Applicant notes this comment.
NE-012	Landscape and Visual	Designated Sites	Section 2. The natural features potentially affected by this application 10.Internationally designated sites a. Natural England's position regarding impacts on internationally designated sites is summarised below. Further detail on our reasoning for this is given against each impact pathway in Part II.	The Applicant notes this comment

NE-013	Landscape and Visual	Designated Sites	b. Natural England is not yet satisfied for 'amber' identified in the text below that it can be ascertained beyond reasonable scientific doubt that the project would not have an adverse effect on the integrity of the following internationally designated sites: • Bath and Bradford on Avon Bats SAC	Please refer to the Applicant's detailed responses below, where a response has been provided to detailed comments relating to the Bath and Bradford on Avon Bats SAC.
NE-014	Landscape and Visual	Mitigation	c. Further mitigation is required to address potential fragmentation effects within Lime Down C. This would comprise replicating the mitigation techniques proposed to address fragmentation effects from the Cable Route Corridor within Lime Down C.	Please refer to the Applicant's detailed responses below, where a response has been provided to detailed comments relating to mitigation potential fragmentation impacts on lesser horseshoe bats associated with the Bath and Bradford on Avon Bats SAC.
NE-015	Landscape and Visual	Designated Sites	d. Natural England is satisfied that other impact pathways are unlikely to result in adverse effects on the integrity of the following internationally designated sites, subject always to the appropriate mitigation being secured adequately.	The Applicant notes this comment
NE-016	Cultural Heritage	Designated Sites	11.Nationally designated sites a. Natural England's position regarding nationally designated sites is summarised below. Further detail on our reasoning for this is given against each impact pathway in Part II. b. Natural England advise that the proposed development is unlikely to result in significant adverse effects to nationally designated sites.	The Applicant notes this comment
NE-017	Ecology and Biodiversity	Protected Species	12.Protected species a. Natural England's position regarding European protected species is summarised below. Further detail on our reasoning for this is given in Part II. b. Further information is sought regarding potential impacts to a number of species including details of habitat clearance work, further information regarding badger survey methodology, detail on mitigation for impacts	Please refer to the Applicant's detailed responses below, where a response has been provided to detailed comments relating to badgers, great crested newts, dormice, and otters and water voles.

			to GCN habitat with the solar PV site, and engagement with Natural England regarding draft licence applications where the potential need for wildlife impacts has been identified. c. Natural England has not received submission of draft protected species licence applications for review.	
NE-018	Description and DCO Process	Designated Landscapes	13.Nationally designated landscapes a. Natural England's position regarding nationally designated landscapes is summarised below. Further detail on our reasoning for this is given in Part II.	The Applicant notes this comment.
NE-019	Cumulative Effects	Cumulative Assessment	b. Whilst the submitted information indicates that the project is unlikely to result in significant adverse landscape impacts when considered alone, an assessment of inter project cumulative effects on the National Landscape should be provided.	The Landscape and Visual Impact Assessment (LVIA) is presented in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]** and includes a Cumulative Assessment. This was carried out on a 10km Cumulative Study Area as shown on **ES Volume 2, Figure 8-15: Cumulative ZTV and Cumulative Study Area (Figure 8-15 Series) [APP-106]**. This area encompasses a large area of the Cotswolds National Landscape (CNL) and there are no inter-project cumulative developments within the CNL. Castle Combe Circuit Solar Farm is an existing solar farm development that is located within the CNL, approximately 6km from the nearest Lime Down Solar Site. As this is an existing development, it has been considered within the baseline assessment rather than the Cumulative Assessment.
NE-020	Soils and Agriculture	BMV Land	14.Soils and best and most versatile agricultural land a. Natural England's position regarding soils and the best and most versatile agricultural land is summarised below. Further detail on our reasoning for this is given in Part II. b. Further information is required to enable a	The Applicant notes this comment

			full assessment of the potential impacts of the project on Best and Most Versatile agricultural land.	
NE-021	Ecology and Biodiversity	Designated Sites	Section 3. Natural England's overall conclusions 15.The main issues raised by this application are impacts on internationally designated sites (namely the Bath and Bradford on Avon Bats SAC and the Severn Estuary SAC/SPA/Ramsar), impacts on nationally designated sites (Harries Ground, Rodbourne SSSI), impacts on protected species (namely bats, dormice, badgers, great crested newts, water voles, and otters), impacts on nationally designated landscapes (namely the Cotswolds National Landscape), and impacts on Best and Most Versatile agricultural land.	The Applicant notes this comment. Impacts on internationally designated sites, nationally designated sites, and protected species are assessed in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061].** In relation to the impacts on nationally designated landscapes (namely the Cotswolds National Landscape), a standalone assessment of the landscape and visual effects of the Scheme on the CNL and its Special Qualities, **ES Volume 3, Appendix 8-6: Assessment of Effects on the Special Qualities of the Cotswolds National Landscape [APP-197]**, has been undertaken, which demonstrates that there are no significant impacts on the CNL.
NE-022	Ecology and Biodiversity	Bat Habitat	16.Regarding the Bath on Bradford on Avon Bats SAC, Natural England concur with the conclusions of the HRA except in regards to fragmentation effects to lesser horseshoe bat habitat within the Solar PV site where additional mitigation measures have been suggested.	Please refer to the Applicant's detailed responses on these matters.
NE-023	Landscape and Visual	Mitigation	17.Regarding the Severn Estuary SAC/SPA/Ramsar, Natural England concur with the conclusions of the HRA that likely significant effects/adverse effects on the integrity of the site can be ruled out subject to securement of all avoidance/mitigation measures.	The Applicant notes this comment
NE-024	Ecology and Biodiversity	Mitigation	18.Natural England advise that further evidence is required to ascertain the	Please refer to the Applicant's detailed responses on these matters.

			potential effects and sufficiency of mitigation in relation to protected species.	
NE-025	Cumulative Effects	National Landscape	19.Natural England recommend that a cumulative effects assessment on the National Landscape is provided to demonstrate that the project will not result in significant adverse impacts to this receptor.	In relation to the impacts on nationally designated landscapes (namely the Cotswolds National Landscape), a standalone assessment of the landscape and visual effects of the Scheme on the CNL and its Special Qualities **(ES Volume 3, Appendix 8-6: Assessment of Effects on the Special Qualities of the Cotswolds National Landscape [APP-197])** has been undertaken, which demonstrates that there are no significant impacts on the CNL. Furthermore, and as described in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**, the Scheme is expected to deliver a range of newly created and enhanced habitats and features which will have a positive impact on a wide range of ecological receptors, including several associated with the CNL. For example, within Lime Down A, B and C only (which border the CNL), it is anticipated that the Scheme will deliver approximately 119.7 hectares of flower-rich neutral grassland (one of the Special Qualities of the CNL) post-development compared with 4.72 hectares at baseline. This is shown on **ES Volume 2, Figure 3-4 Landscape and Ecology Mitigation Plan [APP-084]** and will be secured via the **Outline Landscape and Ecological Management Plan [APP-283].** Such delivery of new habitat is in line with Policy CE8: Nature recovery and Biodiversity of the CNL Management Plan.

NE-026	Soils and Agriculture	BMV Land	20.Natural England advise that further information is required to assessment impacts on Best and Most Versatile agricultural land	The Applicant makes note of this comment. The effects of the Scheme on Best and Most Versatile agricultural land have been assessed within the Environmental Statement, with the findings reported in **ES Volume 1, Chapter 17: Soils and Agriculture [APP-069]**, supported by **ES Volume 3, Appendix 17-1: Agricultural Land Classification and Soil Resource Survey Report [APP-243]**. Further detail in response to Natural England's comments on agricultural land and soil resources is provided within the Applicant's responses set out below. Additional engagement with Natural England conducted on the 9th February 2026 confirmed that the sampling density achieved within the Solar PV Panel Areas at Lime Down is acceptable with no further survey work required. Natural England noted that best practice would be to have completed all Cable Corridor sampling pre-consent, however acknowledge that survey work can continue post-consent. The Applicant and Natural England are in agreement that the effect on BMV agricultural land will be significant.
NE-027	Description and DCO Process	Examination	21.Natural England does not intend to make oral representations at an issue specific hearing or open floor hearing.	The Applicant notes this comment.
NE-028	Description and DCO Process	Advice	Natural England's Relevant Representations Part II: Natural England's detailed advice 22.Part II of these representations expands upon the detail of all the significant issues ('red' and 'amber' issues) which, in our view remain outstanding and includes our advice on pathways to their resolution where possible. Part II also shows 'green' issues where a resolution has been reached	The Applicant notes this comment.

			and subject always to the appropriate requirements being adequately secured.	
NE-029	Ecology and Biodiversity	Environmental Impacts and Assessment	23.Natural England's advice is that in relation to issues within its remit there is a number of areas where the applicant has not provided sufficient evidence to demonstrate that the project will not result in significant adverse impacts on the natural environment.	The Applicant disagrees that sufficient evidence has not been provided to demonstrate that the project will not result in significant adverse impacts on the natural environment. In terms of the assessments within Natural England's remit, potential impacts on ecology and biodiversity are fully assessed in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**. This assessment considers baseline ecological conditions and evaluates likely significant effects arising during the construction, operation and decommissioning phases of the Scheme. It identifies avoidance, mitigation and enhancement measures to address potential impacts on habitats and protected and notable species. It also identifies opportunities for ecological enhancement, including the creation and long-term management of habitats, and delivery of biodiversity net gain. An assessment of the potential effects of the Scheme on soils and agricultural land is provided in **ES Volume 1, Chapter 17: Soils and Agriculture [APP-069]**. This chapter considers baseline agricultural land quality, including Best and Most Versatile (BMV) land, and assesses likely significant effects arising from construction, operation and decommissioning of the Scheme, together with embedded mitigation measures.
NE-030	Ecology and Biodiversity	Impact on Designated Sites	24.Natural England's headline points are that on the basis of the information submitted: 25.Natural England is satisfied that the proposed development will not result in significant adverse effects on the Harries Ground, Rodbourne SSSI.	The Applicant notes this comment

NE-031	Ecology and Biodiversity	Impact on Designated Sites	26.Natural England is not satisfied that it can be excluded beyond reasonable scientific doubt that the project would not have an adverse effect on the integrity of the Bath and Bradford on Avon Bats SAC.	Please refer to the Applicant's detailed responses on these matters.
NE-032	Ecology and Biodiversity	Impact on Protected Species	27.Natural England is not satisfied that sufficient evidence has been provided to demonstrate that the project will not result in significant adverse effects to protected species.	Please refer to the Applicant's detailed responses on these matters.
NE-033	Landscape and Visual	Impact on Designated Sites	28.Natural England is not satisfied that sufficient evidence has been provided to demonstrate that the project will not result in significant adverse effects to the Cotswolds National Landscape.	In relation to the impacts on nationally designated landscapes (namely the Cotswolds National Landscape), a standalone assessment of the landscape and visual effects of the Scheme on the CNL and its Special Qualities **ES Volume 3, Appendix 8-6: Assessment of Effects on the Special Qualities of the Cotswolds National Landscape [APP-197]** has been undertaken, which demonstrates that there are no significant impacts on the CNL. Furthermore, and as described in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061],** the Scheme is expected to deliver a range of newly created and enhanced habitats and features which will have a positive impact on a wide range of ecological receptors, including several associated with the CNL. For example, within Lime Down A, B and C only, it is anticipated that the Scheme will deliver approximately 119.7 hectares of flower-rich neutral grassland (one of the Special Qualities of the CNL) post-development compared with 4.72 hectares at baseline. This is shown on **ES Volume 2**, **Figure 3-4 Landscape and Ecology Mitigation Plan [APP-084]** and will be secured via the **Outline Landscape and Ecological Management**

				Plan [APP-283]. Such delivery of new habitat is in line with Policy CE8: Nature recovery and Biodiversity of the CNL Management Plan.
NE-034	Soils and Agriculture	Impact on BMV Land	29.Natural England is not satisfied that sufficient evidence has been provided to demonstrate that the project will not result in significant adverse effects to the Best and Most Versatile agricultural land+H553H503:H554	The effects of the Scheme on agricultural land, including Best and Most Versatile (BMV) agricultural land, are assessed in **ES Volume 1, Chapter 17: Soils and Agriculture [APP-069]**, with supporting information provided in **ES Volume 3, Appendix 17-1: Agricultural Land Classification and Soil Resource Survey Report [APP-243]**. The assessment considers baseline agricultural land quality and evaluates effects during construction, operation and decommissioning. The assessment concludes that the Scheme will result in significant adverse effects on BMV agricultural land, arising from the temporary and reversible loss of BMV land during the operational period of the Scheme. The assessment also confirms that all land would be

				reinstated and returned to agricultural use as far as practicable following decommissioning, and that no permanent loss of agricultural land is anticipated.
NE-035	Ecology and Biodiversity	Mitigation	30.Natural England advises that, if approved, the project must be subject to all necessary and appropriate requirements which ensure that unacceptable environmental impacts either do not occur or are sufficiently mitigated.	The **Environmental Statement [APP-052 – APP-072]** sets out the steps taken to avoid, mitigate and minimise these impacts as far as possible, and has prepared a number of management plans that will ensure that impacts are kept to a minimum. This includes the **Outline Landscape and Ecological Management Plan [APP-283]**, **Outline Ecological Protection and Mitigation Strategy [APP-284]** and **Outline Construction Environmental Management Plan [APP-277].** These management plans are secured in the **Draft Development Consent Order [APP-016]**.
NE-036	Description and DCO Process	Engagement	31.Natural England will continue engaging with the applicant to seek to resolve outstanding concerns throughout the examination. Natural England advises that the matters indicated as 'red' and 'amber' will require consideration by the Examining Authority during the examination.	The Applicant makes note of these comments and welcomes continued engagement with Natural England.
NE-037	Ecology and Biodiversity	Designated Sites	33.Internationally Designated Sites – Amber a. Scope of the assessment - Green i. Natural England agree with the Zone of Influence used in the Habitats Regulations Assessment Report (EN010168/APP/7.10) to identify internationally designated sites	The Applicant welcomes this comment.

			which could be affected by the proposed development. ii. Natural England advise that the list of internationally designated sites provided at 4.2.6 of the Habitats Regulations Assessment Report is comprehensive and correct. We agree that Salisbury Plain SPA can be scoped out of the assessment.	
NE-038	Ecology and Biodiversity	Ecological Surveys	b. Test of Likely Significant Effects - Bath and Bradford on Avon Bats SAC – Amber i. Based on the submitted information including Figure 9-1-4 Wiltshire Impact Zones for Bats (EN010168/APP/6.2) and the results of bat surveys presented in Appendix 9-3 Bat Survey Report (EN010168/APP/6.3) of the Environmental Statement, Natural England agree with the conclusions of the Habitats Regulations Assessment Report that the solar PV site does not comprise functionally linked land for SAC greater horseshoe bat populations. We also agree that due to the location of the Cabe Route Corridor in an Impact Zone for greater horseshoe bats identified in Figure 9-1-4, the Cable Route Corridor could provide land functionally linked to the SAC for greater horseshoe bat populations. We therefore agree that the proposed development could result in likely significant effects on the SAC through loss or change of functionally linked land or fragmentation effects.	The Applicant notes this comment.
NE-039	Ecology and Biodiversity	Impacts on Bats	ii. As no buildings which provide roost potential for greater horseshoe bats will be impacted by the proposed development, we agree that likely significant effects as a result of loss or damage to roosts and killing and injury of bats can be screened out.	The Applicant notes this comment.

NE-040	Ecology and Biodiversity	Impacts on Bats	iii. We note that the Habitats Regulations Assessment Report concludes that the land within the Solar PV sites is not functionally linked to the Bath and Bradford on Avon Bats SAC. This is due to the distance between the site and the current Impact Zones for lesser horseshoe bats resulting from the declassification of the Core Roost near the village of Grittleton. Natural England would like to highlight that whilst the roost might not meet the criteria, as assigned by the planning strategy, if the roost is connected to the SAC by functionally linked land, and is a species included on the designation, impacts on the population could affect the integrity of the population.	The Applicant notes this comment and agrees that impacts to functionally linked land, where such land supports the populations associated with the SAC population, could affect the integrity of the SAC.
NE-041	Ecology and Biodiversity	Bat Surveys	iv. The results of bat surveys presented in the Bat Survey Report of the demonstrate that lesser horseshoe bats utilise habitats within the Lime Down C throughout the survey season. The earliest pass was recorded approximately half an hour after sunset with the report stating that the species was generally recorded at Lime Down C shortly after dusk. The timing of calls early in the night indicates that lesser horseshoes using Lime Down C are roosting close to the Order Limits. Based on the level and nature of lesser horseshoe activity recorded, it is difficult to determine that Lime Down C is not functionally linked to the SAC beyond reasonable scientific doubt.	The Applicant concurs that relative activity levels and timing of lesser horseshoe bat calls recorded at Lime Down C are indicative of a lesser horseshoe bat roost close to the Order Limits in this location. However, it is the Applicant's view that this does not in itself demonstrate a functional link to the SAC. Lesser horseshoe bats are known to utilise small, local roosts outside of the boundaries of the SAC boundaries, including night roosts, non-breeding day roosts, maternity and satellite roosts, which may support local populations that are not connected to SAC roosts. It is also not possible to deduce likely numbers of individuals from detector recordings alone. It is not possible to determine to what extent individual bats move between the SAC and the Core Area/Impact Zone) without detailed and advanced survey data (e.g. from radio-tracking individual bats). In this instance, and as set out within the **Habitats Regulations Assessment**

				Report [APP-275], the published information provided in the Natural England / Wiltshire Council Bat Special Areas of Conservation (SAC) – Planning Guidance for Wiltshire (September 2015) and Impact Zones for Bat Species' layer on the publicly available 'Wiltshire Planning Explorer' has been used to define Functionally-Linked Land (FLL) in the context of HRA. It would be considered inappropriate and inconsistent to attribute FLL status to the location in question on the basis of the recordings made to date. The consultation zones / Impact Zones provided within this published information has been determined based on best available population-level evidence derived from radio-tracking studies. As such Lime Down C lies beyond the current identified Impact Zones within which land is considered likely to be functionally linked to the SAC, and it is the Applicant's view that Lime Down C does not represent FLL for lesser horseshoe bats associated with the SAC. The Applicant will continue to engage with Natural England on this matter.

NE-042	Ecology and Biodiversity	Impacts on Bats	v. Habitats present within Lime Down C largely comprise of arable fields intersected by hedgerows and ditches. Whilst the hedgerows and ditches provide suitable 7 commuting habitat for lesser horseshoe bats, the arable fields are unlikely to provide significant quantities of lesser horseshoe insect prey species as these are more typical of grazed pasture and woodland. Therefore we agree that the proposed development is unlikely to result in significant effects on the SAC through the loss of foraging habitat however, when considering the impacts of the scheme in the absence of mitigation, fragmentation effects resulting from impacts to commuting habitats within Lime Down C should be screened in for assessment in the Appropriate Assessment.	The Applicant welcomes the corroboration of the view that the Scheme is unlikely to result in significant effects on the SAC through loss of foraging habitat. Fragmentation impacts effects on lesser horseshoes associated with the SAC are not assessed within the **Habitats Regulations Assessment Report [APP-275]** as these have been screened out. With respect to fragmentation effects on lesser horseshoes generally, the Applicant refers to the previous detailed response concerning the relationship between lesser horseshoe bats using Lime Down C and the SAC populations. Notwithstanding, the Applicant refers to the assessment of impacts on all bat species using the Solar PV Sites for foraging / commuting in paragraph 9.10.182 of **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]** which concludes the Scheme will not result in significant residual effects through fragmentation for any species, including lesser horseshoe bats. Nevertheless the Applicant confirms that the mitigation measures proposed for minimising fragmentation impacts within the Cable Route Corridor, will also apply to Lime Down C. These measures relate to the narrowing of any required hedgerow gaps to 10 to 12 m in width, and control measures for lighting during construction. The **Outline Ecological Protection and Mitigation Strategy (OEPMS) [APP-284]** will be updated to ensure these measures are adopted for Lime Down C as well as the Cable Route Corridor. The Applicant will continue to engage with Natural England on this matter.
NE-043	Ecology and Biodiversity	Impacts on Bats	vi. We agree that likely significant effects to Bechstein's bats resulting from loss or change to functionally linked land can be screened out due to the distance of the site	The Applicant welcomes this comment

			from Bechstein's bat Impact Zones, and the lack of significant areas of suitable habitat within the order limits. We note that likely significant effects have been screened in from fragmentation effects, loss and damage to roosts, and killing and injury. The Order Limits are outside of the Impact Zone for Bechstein's Bats and information provided to date through both the desk survey and site specific surveys does not indicate the presence of Bechstein's Bats outside of the Impact Zone. Information provided to date therefore does not indicate that land outside of the Impact Zone is functionally linked to the SAC.	
NE-044	Ecology and Biodiversity	Impact on Habitats	c. Test of Likely Significant Effects – Severn Estuary SAC- Green i. Natural England agree that the proposed development is unlikely to result in habitat degradation of the Annex I Habitats which the Severn Estuary SAC is designated for due to the distance between the proposed development and the SAC and the use of best practice pollution avoidance measures detailed in the Outline CEMP (EN010168/APP/7.12).	The Applicant welcomes this comment
NE-045	Ecology and Biodiversity	Impact on Habitats	ii. Natural England agree that likely significant effects to the Annex II Species which the Severn Estuary SAC is designated for as a result of loss or change of functionally linked land, fragmentation, or killing and injuring can be screened out as habitats within the Order Limits do not provide functionally linked land for the Annex II species. Further, we agree that likely significant effects on the Annex II species from habitat degradation can be screened out due to the distance between the proposed development and the SAC and	The Applicant welcomes this comment

			the use of best practice pollution avoidance measures detailed in the Outline CEMP	
NE-046	Ecology and Biodiversity	Impact on Habitats	d. Test of Likely Significant Effects – Severn Estuary SPA - Green i. Based on the result of wintering bird surveys included in Appendix 9-7 Wintering Bird Survey Report (EN010168/APP/6.3) of the Environmental Statement, Natural England agree that the proposed development site does not support land which is functionally linked to the Severn Estuary SPA. We therefore agree that likely significant effects as a result of loss or change of functionally linked land to this designated site can be screened out.	The Applicant welcomes this comment
NE-047	Ecology and Biodiversity	Impact on Habitats	e. Test of Likely Significant Effects – Severn Estuary Ramsar - Green i. Based on the result of wintering bird surveys included in the Wintering Bird Survey Report Natural England agree that the proposed development site does not provide functionally linked land for the bird species which the Severn Estuary Ramsar is designated for. We therefore agree that likely significant effects as a result of loss or change of functionally linked land for Ramsar Criteria 5 & 6 can be ruled out.	The Applicant welcomes this comment
NE-048	Ecology and Biodiversity	Impact on Habitats	ii. Natural England agree that the proposed development is unlikely to result in habitat degradation of Ramsar Criteria 1 & 3 Habitats which the Severn Estuary Ramsar is designated for due to the distance between the proposed development and the Ramsar and the use of best practice pollution avoidance measures detailed in the Outline CEMP.	The Applicant welcomes this comment

NE-049	Ecology and Biodiversity	Impact on Fish	iii. We note that eel and sea trout populations are potentially present in watercourses within the Order Limits and these watercourses have therefore been assumed to be functionally linked to the Ramsar. Due to the scale of habitat loss resulting from the proposed development, we agree likely significant effects as a result of loss or change of functionally linked land can be screened out. Due to the use of best practice pollution avoidance measures detailed in the Outline CEMP, we agree that likely significant effects through habitat degradation can be screened out. We agree that likely significant effects from fragmentation and killing and injuring should be screened in due to the presence of functionally linked land within the order limits.	The Applicant welcomes this comment
NE-050	Ecology and Biodiversity	Impact on Habitats	f. Appropriate Assessment – Bath and Bradford on Avon Bats SAC – Amber i. As stated in the Test of Likely Significant Effects Stage, the Cable Route Corridor includes areas within greater horseshoe bat Impact Zones and could therefore provide functionally linked land for SAC populations of greater horseshoe bats. The Habitats Regulations Assessment Report states that proposed mitigation to avoid loss of functionally linked would include siting of Temporary Construction Compounds outside of the Impact Zone. This is detailed in the Works Plan (EN010168/APP/2.3). Provided this measure is secured in the Order, Natural England agree that adverse effects on the SAC through loss or change of functionally linked land can be ruled out.	The Applicant welcomes this comment

NE-051	Ecology and Biodiversity	Impact on Habitats	ii. Further, the Habitats Regulations Assessment Report screens in likely significant effects from fragmentation, resulting from the use of construction lighting and temporary loss of hedgerows within the Cable Route Corridor. Mitigation proposed includes limiting the temporary loss of hedgerows within the Impact Zones to a maximum of 10m gaps and measures to avoid light spillage towards valuable ecological habitats. Both measures are included in the Outline CEMP.	The Applicant welcomes this comment
NE-052	Ecology and Biodiversity	Impact on Habitats	iii. As discussed at 29.b.ii - v, Natural England advise that fragmentation effects resulting from impacts to lesser horseshoe commuting habitats within Lime Down C should be screened in for assessment in the Appropriate Assessment. Provided the above mitigation measures relating to fragmentation effects proposed for use in the Cable Route Corridor are also used in Lime Down C, Natural England consider that adverse effects on the SAC through fragmentation can be ruled out. The Outline CEMP should be updated to reflect the above.	The Applicant refers to the previous detailed response concerning the relationship between lesser horseshoe bats using Lime Down C and the SAC populations. Notwithstanding, the Applicant refers to the assessment of impacts on all bat species using the Solar PV Sites for foraging / commuting in paragraph 9.10.182 of **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]** which concludes the Scheme will not result in significant residual effects through fragmentation for any species, including lesser horseshoe bats. Nevertheless, the Applicant confirms that the mitigation measures proposed for minimising fragmentation impacts within the Cable Route Corridor, will also apply to Lime Down C. These measures relate to the narrowing of any required hedgerow gaps to 10 to 12 m in width, and control measures for lighting during construction. The **Outline Ecological Protection and Mitigation Strategy (OEPMS) [APP-284]** will be updated to ensure these measures are adopted for Lime Down C as well as the Cable Route Corridor.

NE-053	Ecology and Biodiversity	Mitigation	g. Appropriate Assessment – Severn Estuary Ramsar - Green i. As stated in the Test of Likely Significant Effects Stage, potential impacts to the Ramsar through fragmentation of eel and sea trout habitat and killing or injuring of these species have been screened in due to the potential need for watercourse crossings during construction. Proposed mitigation includes avoiding new crossings for access in watercourses identified as potentially suitable for these species within the solar PV site, and using trenchless solutions to cross watercourses suitable for migratory fish in the Cable Route Corridor. These measures are included in Appendix 11-1 Flood Risk Assessment and Drainage Strategy Covering Report (EN010168/APP/6.3) of the Environmental Statement. Provided these measures are secured in the Order, Natural England agree that adverse effects on the Ramsar through fragmentation can be ruled out.	The Applicant welcomes this comment
NE-054	Ecology and Biodiversity	Mitigation	ii. Further, fragmentation effects during operation have been screened in for assessment in the Appropriate Assessment due to electromagnetic forces from buried cables impacting the behaviour of migratory fish using watercourses above the cables. Mitigation includes burying cables to a minimum depth of 5m below the channel bed, this is included in the Outline EPMS (EN010168/APP/7.19). Provided this measure is secured in the Order, Natural England agree that adverse effects on the Ramsar through fragmentation effects can be rules out.	The Applicant welcomes this comment

NE-055	Ecology and Biodiversity	Designated Sites	34.Nationally Designated Sites – Green a. Harries Ground, Rodbourne SSSI is located immediately adjacent to Lime Down E. The SSSI is designated for species rich grassland and a population of the marsh fritillary butterfly.	The Applicant notes this comment
NE-056	Ecology and Biodiversity	Impact on Designated Sites	b. Natural England advise that the proposed development is unlikely to adversely affect the SSSI. A 15m ecological buffer will be provided between the SSSI and development within the Order Limits. Best practice pollution prevention measures are included in the Outline CEMP and Outline EPMS. Further, the foodplant of the marsh fritillary butterfly (devils bit scabious) has not been recorded in habitat surveys undertaken within the Order Limits. Provided that the ecological buffer and pollution prevention measures are secured in the Order, significant adverse effects to the SSSI are not expected.	The Applicant notes this comment
NE-057	Ecology and Biodiversity	Protected Species	35.Protected Species – Amber a. Where the external project team has identified the potential future need for wildlife licences to permit impacts to protected species, NEWLS would encourage the applicant and their representatives to engage with us further regarding draft licence applications to enable Natural England to issue Letters of No Impediment to the project.	The Applicant notes this comment. The only requirement for wildlife licenses identified by the Applicant at this stage relates to works within the Cable Route Corridor which may impact great crested newts. The Applicant is committed to register these works under Natural England's District Level Licensing (DLL) Scheme and a countersigned Impact Assessment and Conservation Payment Certificate (IACPC) has been submitted as evidence of this commitment. Notwithstanding this, the Applicant acknowledges that the requirement for further licenses may be required for certain protected

				species should unavoidable impacts be identified at the detailed design stage, through pre-construction inspections secured as part of the **Outline Ecological Protection and Mitigation Strategy (EPMS) [APP-284]**. The Applicant welcomes the opportunity to engage with Natural England on additional wildlife licenses should the need arise.
NE-058	Ecology and Biodiversity	Bat Surveys	b. Bats – Amber i. The Bat Survey Report indicates external building inspections, and Ground Level Tree Assessments (GLTAs) have been conducted between June 2023 and June 2025 at the Solar PV sites. However, it has been highlighted that the level of survey detail for the GLTAs were not consistent with best practise guidelines. Currently no impacts are proposed on these features, however in Chapter 9 Ecology and Biodiversity (EN010168/APP/6.1) it has been suggested that the scheme will likely result in some tree loss. If additional impacts are identified surveys should be conducted in line with best practice guidelines, i.e. Bat Surveys for Professional Ecologists: Good Practice Guidelines (4th edition).	The Applicant notes this comment. As reported in paragraphs 1.2.11 and 1.2.12 of **ES Volume 3, Appendix 9-3: Bat Survey Report [APP-200]**, the bat survey guidelines with respect to GLTA methodology were updated in September 2023. Surveys up until that point had followed the most up-to-date guideline, and since most of the survey work had been completed prior to the publication of the updated guideline the same methodology was used subsequently to ensure consistency across all surveys. It is acknowledged within **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]** that some loss of trees within the Cable Route Corridor may be necessary for access / installation of the cable route. Any trees potentially requiring removal will be subject to further update inspection, which requirement is secured by the **Outline Ecological Protection and Mitigation Strategy (EPMS) [APP-284]**. A review of the **Outline Ecological Protection and Mitigation Strategy (EPMS) [APP-284]** will be undertaken, and an updated version prescribing all such inspections to follow the most up-to-date guidance will be submitted at Deadline 1.
NE-059	Ecology and Biodiversity	Impact on Habitats	ii. In section 9.10.6 of Chapter 9 Ecology and Biodiversity, is has been suggested that Lime Down C is not Functionally Linked Land to the Bath and Bradford-uponAvon SAC due to the declassification of the Core Roost near the village of Grittleton.	The Applicant refers to the previous detailed response concerning the relationship between lesser horseshoe bats using Lime Down C and the SAC populations.

			Natural England would like to highlight that whilst the roost might not meet the criteria, as assigned by the planning strategy, if the roost is connected to the SAC by FLL, and is a species included on the designation, impacts on the population could affect the integrity of the population.	
NE-060	Ecology and Biodiversity	Impact on Habitats	iii. It has been identified in Chapter 9 Ecology and Biodiversity and the Bat Survey Report that part of the cable corridor intersects the Core Areas for Greater Horseshoe. As per section 9.10.15 of Chapter 9 Ecology and Biodiversity, the proposed hedgerow gap sizes within Impact Zones for Bats, i.e. maximum of 10m, is appropriate.	The Applicant welcomes this comment
NE-061	Ecology and Biodiversity	Mitigation	iv. Any lighting mitigation proposed for impacts on bats should take account of relevant guidance, i.e. Bats and Artificial Lighting at Night Guidance Note (ILP, 2023), and Guideline for consider of bats in lighting project (Voigt et al., 2018).	The Applicant notes this comment. The adoption of an ecologically sensitive lighting strategy during construction will be secured via the **Outline Ecological Protection and Mitigation Strategy (EPMS) [APP-284]**. A review of the **Outline Ecological Protection and Mitigation Strategy (EPMS) [APP-284]** will be undertaken, and an updated version making reference to relevant guidance will be submitted at Deadline 1.
NE-062	Ecology and Biodiversity	Impact on Habitats	c. Dormice – Amber i. Details should be provided of how the hedgerows will be removed, i.e. single or two stage clearance for dormice. Any hedgerow removal should be consistent with the recommended timings included in the dormice conservation and mitigation handbooks. If non-standard timings are proposed, justification will be required as to how impacts to hibernating and/or breeding dormice will be avoided.	The Applicant notes this comment and agrees with this statement. A review of the **Outline Ecological Protection and Mitigation Strategy (EPMS) [APP-284]** will be undertaken, and a revised version of the document with additional details on the approach to considering dormice during hedgerow removal will be submitted at Deadline 1.

NE-063	Ecology and Biodiversity	Badger Surveys	d. Badger– Amber i. NEWLS has not been supplied with the full badger survey report document for review, hence our assessment comments are based on review of limited information supplied within the Chaper 9 Ecology and Biodiversity document.	The Applicant notes these comments. The **Badger Survey Report (ES Volume 3, Appendix 9-2: Badger Survey Report [APP-199])** as well as corresponding **ES Volume 2, Figures 9-2-1 to 9-2-5 [APP-115]** were made confidential at the instruction of PINS due to containing sensitive information relating to a species at risk of persecution. These documents are available on request to those with a legitimate need to view them, and a copy will be sent to Natural England for review.
NE-064	Ecology and Biodiversity	Badger Surveys	ii. The badger survey information would benefit from further clarification to confirm that it accords with current best practice. In particular, additional detail is needed on whether a dedicated badger survey methodology was used, the spatial extent of the survey (including any buffer beyond the site boundary), and the level of survey effort undertaken. While surveys are reported between June 2023 and August 2024, with an update in May–June 2025, it is unclear whether the most recent survey re-validated all relevant areas using a consistent and robust approach. The submission would also benefit from providing a summary of the survey findings, including confirmation of badger presence or absence, any sett locations and classifications, and an indication of surveyor competence and consideration of the legal protection afforded to badgers and their setts.	The Applicant notes these comments. The methodology and findings of badger surveys are detailed within the **Badger Survey Report (ES Volume 3, Appendix 9-2: Badger Survey Report [APP-199])** as well as corresponding **ES Volume 2, Figures 9-2-1 to 9-2-5 [APP-115]**. These were made confidential at the instruction of PINS due to containing sensitive information relating to a species at risk of persecution. These documents are available on request to those with a legitimate need to view them, and a copy will be sent to Natural England for review.

NE-065	Ecology and Biodiversity	Badger Surveys	iii. The brief survey information regarding walkover surveys is insufficient to demonstrate compliance with current best practice, and similarly, would be insufficient to support a wildlife licence application should one to derogate against licensable impacts to badgers be required. It is noted, however, that the aboverequested information may have been presented within the badger survey report document, and NEWLS' assessment comments as above may well change were we to review a non-redacted copy of that document.	The Applicant notes these comments. The methodology and findings of badger surveys are detailed within the **Badger Survey Report (ES Volume 3, Appendix 9-2: Badger Survey Report [APP-199])** as well as corresponding **ES Volume 2, Figures 9-2-1 to 9-2-5 [APP-115]**. These were made confidential at the instruction of PINS due to containing sensitive information relating to a species at risk of persecution. These documents are available on request to those with a legitimate need to view them, and a copy has now been sent to Natural England for review.
NE-066	Ecology and Biodiversity	Impact on Habitats	iv. The impact assessment identifies appropriate impact pathways for badgers and proposes embedded mitigation; however, its conclusions rely heavily on assumptions and currently undefined future actions. In particular, the assessment acknowledges that the extent of sett exclusion works—especially within the cable route corridor and for newly excavated setts—cannot be identified at this stage, yet still draws conclusions on impact significance, relying on future licensing to manage uncertainty.	The Applicant notes these comments. It is the Applicant's view that appropriate mechanisms for identifying and mitigating any (at present) uncertain impacts on badgers will be secured through the measures prescribed within Method Statement 8 of the **Outline Ecological Protection and Mitigation Strategy (EPMS) [APP-284]** and in accordance with relevant legislation pertaining to badgers and their setts. These measures include comprehensive update pre-construction surveys to identify any setts which may be impacted, and a commitment to avoid setts if practicable. In the event that a sett will be unavoidably impacted, a licence will be sought from Natural England to permit otherwise unlawful works, and any works would be in accordance with the conditions of the licence.

NE-067	Ecology and Biodiversity	Badger Surveys	v. Further, given the current lack of clarity and detail regarding the survey effort, it is difficult for NEWLS to comment fully as to whether the assessment of impacts is appropriate and sufficient relative to the badger population(s) likely to be affected. It is likely that further consideration of the likely impacts, and particularly those which may require a licensed approach, will be required once further detail regarding the scheme's design and exact footprint becomes available.	The methodology and findings of badger surveys are detailed within the **Badger Survey Report (ES Volume 3, Appendix 9-2: Badger Survey Report [APP-199])** as well as corresponding ES Volume 2, Figures 9-2-1 to 9-2-5 [APP-115]. These documents are available on request to those with a legitimate need to view them, and a copy has now been sent to Natural England for review.
NE-068	Ecology and Biodiversity	Mitigation	vi. The proposed mitigation measures are broadly in line with Natural England's expectations regarding mitigation impacts to badgers and their setts; however, without further and full detail regarding the exact footprint and impacts of the scheme, it is difficult to comment fully as to whether the proposed mitigations are wholly sufficient. NEWLS welcomes the commitment to future pre-construction surveys, the proposed buffers around identified sett structures, and the recognition that licences will be required and sought where impacts to setts are likely; however, the current mitigation approach is heavily reliant on these future surveys and licensing interventions to resolve currently undefined impacts, particularly in relation to the cable route corridor and any newly excavated setts.	The Applicant notes this comment and acknowledges it is not possible to provide full details on the exact footprint of certain works (particularly within the Cable Route Corridor) at this stage. It is the Applicant's view however that a robust process for identifying and, if necessary, mitigating impacts to badger setts will be secured via the approach to be adopted as part of Method Statement 8 of the **Outline Ecological Protection and Mitigation Strategy (EPMS) [APP-284]**. The exact details of any mitigation (if required) for impacts on individual setts will need to be determined on a case-by-case basis. The Applicant will continue to consult with Natural England on the appropriateness of any future mitigation requirements, via mitigation licence application if necessary.
NE-069	Ecology and Biodiversity	Mitigation	vii. As with our comments regarding the survey and impact assessment regarding badgers, further detail and clarity on the mitigation measures and how they will be employed to address specific impacts, particularly impacts to sett structures, would be beneficial. Again, it is acknowledged that this information may be unavailable until	The Applicant notes this comment. It is the Applicant's view however that a robust process for identifying and, if necessary, mitigating impacts to badger setts will be secured via the approach to be adopted as part of Method Statement 8 of the **Outline Ecological Protection and Mitigation Strategy (EPMS) [APP-284]**. It is noted that exact details of any mitigation (if required) for impacts on individual

			further design details regarding the scheme are finalised.	setts will need to be determined on a case-by-case basis. The Applicant welcomes the opportunity to consult with Natural England on the appropriateness of any future mitigation requirements, via mitigation licence application if necessary.
NE-070	Ecology and Biodiversity	Great Crested Newt Surveys	e. Great Crested Newts (GCN) – Amber i. The survey effort as undertaken to date is likely to be sufficient to support an application to enter Natural England's District Level Licensing (DLL) scheme for GCN; however, if there is likely to be a significant temporal gap between the point at which the existing survey data was collected and when the project receives it DCO consent and an application for the DLL scheme is submitted, further more recent surveys should be considered to provide more up to date and salient information.	The Applicant notes these comments. The Applicant agrees that sufficiently up-to-date survey effort should underpin a future required DLL scheme application at the point of applying. Notwithstanding, it is noted that it is not essential to have undertaken surveys in order to apply and register for the DLL scheme.
NE-071	Ecology and Biodiversity	Mitigation	ii. It is noted that the project intends to pursue a DLL approach with respect to addressing impacts to GCN as a result of the cable route works, and following NEWLS' review of the impact information associated with the cable route works this approach would appear to be proportionate and ecologically appropriate. However, the mitigation proposals with respect to construction activities for the Solar PV sites are less clear, principally as the proposed mitigation focuses on sympathetic timing of habitat and site works and on the establishment of buffers around priority ponds habitats. Whilst Natural England welcomes these measures, it is unclear how further impacts to terrestrial habitats, particularly those connective and foraging habitats in and around and between aquatic habitats will be managed and mitigated for.	The Applicant notes this comment. As part of embedded mitigation measures for the Solar PV Sites, a 50m protective buffer around ponds with confirmed GCN presence (or where GCN absence has not been confirmed) will be adopted in which no impacts to terrestrial habitats will occur. This will be secured via measures prescribed in Method Statement 12 of the **Outline Ecological Protection and Mitigation Strategy (EPMS) [APP-284]**, which will include maintenance of protective fencing around buffer zones, within which no works will occur. A suite of other precautionary mitigation measures for works between 50m to 250m of GCN ponds are also prescribed within Method Statement 8 of the **Outline Ecological Protection and Mitigation Strategy (EPMS) [APP-284]**, including sensitive timings of works, good practice storage of materials and the attendance of an Ecological Clerk of Works

			At present the risk of impacts to newts using such habitats to move between waterbodies has not been sufficiently address. Where works are likely to take place in suitable terrestrial habitats within 50m of ponds with confirmed or likely GCN presence, the need for additional mitigation, including measures captured by an appropriate wildlife licence should be considered further.	(EcoCoW) in a watching brief role. These measures are considered by the Applicant to be appropriate for addressing potential impacts to GCN at the Solar PV Sites.
NE-072	Ecology and Biodiversity	Mitigation	f. Water Vole & Otters i. Potential impacts to otters and water voles have been identified and recognised as part of the proposals, and an approach to avoid and mitigate these impacts in line with the mitigation hierarchy has been proposed, which Natural England welcomes. Again, given the limited review on the wider survey backdrop that NEWLS has undertaken, commenting on whether the proposed mitigation approach fully address potential impact is difficult, but the adherence to the mitigation hierarchy and the recognition that licensed mitigation measures may be required is welcomed.	The Applicant notes this comment. A precautionary approach to temporary works affecting suitable habitat for water voles and otters is prescribed by (will be secured via) the **Outline Ecological Protection and Mitigation Strategy (EPMS) [APP-284]**. This includes pre-commencement inspection and, in the event that any burrow, holts or other sheltering features are encountered, a commitment to avoid impacts (e.g. through adopting trenchless technologies or through micro-siting of cable works). Should any impacts on any such features be unavoidable, appropriately licensed mitigation / compensation will be secured, and the Applicant will further engage with Natural England should the need arise.
NE-073	Landscape and Visual	Cotswolds National Landscape	36.Nationally Designated Landscapes - Amber a. The Order Limits are immediately adjacent to the Cotswolds National Landscape. We welcome that a specific assessment of the potential impact of the proposed development on the national landscape and its special qualities has been submitted (Environmental Statement Volume 3, Appendix 8-6, Assessment of	The Applicant notes this comment.

			Effects on the Cotswolds National Landscape and its Special Qualties - EN010168/APP/6.3).	
NE-074	Landscape and Visual	Cotswolds National Landscape	b. Lime Down D & E have no landscape of visual relationship with the National Landscape. The below comments therefore focus on potential landscape and visual impacts of Lime Down A – C.	The Applicant acknowledges Natural England's confirmation that Lime Down D and E are not within the setting of the CNL. It is agreed that Sites A, B and C are within the setting of the CNL.
NE-075	Landscape and Visual	Cotswolds National Landscape	c. Lime Down A is immediately adjacent to the National Landscape with the northern boundaries of fields A1, A11, and A12 immediately abutting the National Landscape boundary. Viewpoint 5 is located within the National Landscape to the east of the village of Sherston. Baseline photography (presented in Environmental Statement Volume 2, Figure 8-14 Baseline Photography and Photomontages) demonstrates that topography and existing vegetation largely screens views of the proposed development from within the National Landscape	The Applicant notes this comment.
NE-076	Landscape and Visual	Cotswolds National Landscape	d. Viewpoints 4 & 6 are located on the boundary of the National Landscape adjacent to the Order Limits. Baseline photography demonstrates that the Order Limits are more visible from National Landscape in these locations due to the proximity between the National Landscape and the Order Limits. However, as shown in the Works Plan, panels will not be located within the northern extent of field A1 or within the entirety of fields A11 and A12. This is welcomed and will reduce the landscape and visual impacts of the proposed development.	The Applicant notes this comment.
NE-077	Landscape and Visual	Cotswolds National Landscape	e. Lime Down B is located in close proximity to the National Landscape Boundary. Topography and existing vegetation limit the intervisibility between Lime Down B and the	The Applicant notes this comment.

			National Landscape. Baseline photography and photomontages at Viewpoints 3 & 18 demonstrate the limited visibility of the scheme from the National Landscape. This is further demonstrated by photography and photomontages from viewpoints CNL D & E.	
NE-078	Landscape and Visual	Cotswolds National Landscape	f. The western boundary of Lime Down C is adjacent to the National Landscape boundary with fields C1, C6, C8, C9, and C10 directly abutting the National Landscape boundary. Viewpoints 25, 26, and CNL G are located on the interface between the National Landscape and the order limits. Baseline photography demonstrates that the Order Limits are clearly visible from these locations however, as shown on the Works Plan, panels will not be located in the parts of fields directly adjacent to the National Landscape boundary with fields C1, C6, C8, and C10 retained clear of panels. Photomontages from the aforementioned viewpoints demonstrates that this limits the landscape and visual impact of the proposed development.	The Applicant notes this comment.
NE-079	Landscape and Visual	Cotswolds National Landscape	g. We note and welcome the avoidance and mitigation measures detailed in Section 2.3 of the Assessment of Effects on the Cotswolds National Landscape and it's Special Qualities. Further, the enhancement measures detailed in this section aid in demonstrating that the scheme will further the purposes of the National Landscape.	The Applicant notes this comment.
NE-080	Landscape and Visual	Cotswolds National Landscape	h. We welcome the detailed assessment of the potential impacts of the proposed development on each of the special qualities of the national landscape provided in Section 3 of the Assessment of Effects on	The Applicant notes this comment.

			the Cotswolds National Landscape and it's Special Qualities. Based on the information provided in this assessment, Natural England consider that the scheme is unlikely to result in significant adverse impacts to the Cotswolds National Landscape when considered alone.	
NE-081	Landscape and Visual	Cumulative effects	i. It is recognised that Environmental Statement Volume 1, Chapter 8: Landscape and Visual (EN010168/APP/6.1) includes an assessment of inter-project cumulative landscape and visual effects, however this does not specifically consider the potential for cumulative effects on the National Landscape and its special qualities. To demonstrate that there would not be cumulative effects on the National Landscape that would increase effects identified when considering the project alone, it is recommended that a cumulative effects assessment is undertaken which specifically consideres the landscape and visual effects of the project and cumulative development sites on the Cotswolds National Landscape and its special qualities.	The Cumulative Assessment within the **Landscape and Visual Impact Assessment (ES Volume 1, Chapter 8: Landscape and Visual [APP-060])** was carried out on a 10km Cumulative Study Area as shown on **ES Volume 2, Figure 8-15: Cumulative ZTV and Cumulative Study** Area **(Figure 8-15 Series) [APP-106]**. This area encompasses a large area of the CNL and there are no inter project cumulative Sites within the CNL. Castle Coombe Circuit Solar Farm is an existing Solar Farm within the CNL located approximately 6km from the nearest Lime Down Solar Site. As this is an existing development, it has been considered within the baseline assessment rather than the Cumulative Assessment. The Inter-Project Cumulative Effects of the Scheme are set out in section 13 of **ES Chapter 8: Landscape and Visual [APP-060]**. The included Cumulative Development Sites as shown in Table 8-13 are shown on the figures in **ES Volume 2, Figure 8-15 [APP 106].** There are no cumulative Sites within the 10km Cumulative Study Area from the Short List within the CNL and as such there are no cumulative effects on the CNL. Following a meeting with Natural England on 18th February 2026, the applicant has considered the cumulative effects of the Scheme on the CNL's setting. There are three Cumulative Sites in the vicinity of the CNL

				included in the short list. These include CD Sites 221, 234 and 346. These sites are considered below: **CD Site 221**- Application reference PL/2021/06100. The approved application is for the installation of a solar farm of up to 49.9MW of generating capacity and associated works. It is located to the south of the M4; is 0.48km to the east of the Cable Route Corridor; and 3.57km south of the Lime Down Solar Sites. It is located 0.8Km to the east of the CNL boundary (at its nearest point) and is located on land between 105 and 115m AOD within the typical rolling Limestone Lowland Character Area (LCA16a). As the Cable Route Corridor is close to the CNL boundary, there is some limited intervisibility between the temporary works within the Cable Route Corridor from within the CNL. However, there is no visibility from the CNL to CD Site 221 and is not considered to be within the setting of the CNL. There is also no intervisibility between the Lime Down Solar Sites and the CD Site. As such, there would be no cumulative effects on the setting of the CNL as a result of the Lime Down Scheme and CD Site 221. **CD Site 234** - Application reference 20/05893/SCO. An EIA screening/scoping opinion for installation of a solar farm with a 49.9 MW output which has now been decided that EIA is required. The Site extends to approximately 129Ha and is located to the north of Malmesbury; it is 1.13kmkm from the Cable Route Corridor and 5.62km from the Lime Down Solar Sites. It is located approximately 6.96km to the east of the CNL boundary (at its nearest point) which broadly follows the River Avon. Site 234 is

				located between 90 and 112m AOD. Although there is potential visibility of Site 234 from the CNL, there is no intervisibility from within the CNL to both CD Site 234 and the Lime Down Scheme. This is due to distance, the intervening rolling topography and associated woodland and the town of Malmesbury which further separates the Site from the Lime Down Scheme. As such, there would be no cumulative effects on the setting of the CNL as a result of the Lime Down Scheme and CD Site 234. **CD Site 346** - Application reference PL/2024/09410. An application for construction and operation of a solar farm together with all associated works, equipment and necessary infrastructure on Land East of Battens Farm, Allington, Chippenham. The CD Site 346 is located 0.02km from the Cable Route Corridor and 6.05km from the Lime Down Solar Sites. The CD Site 346 is located approximately 610m east of the CNL boundary near Yatton Keynell. Due to the sloping topography, the CD Site 346 and part of the Cable Route corridor are considered to be within the setting of the CNL. There would be some intervisibility between the temporary works within the Cable Route Corridor and CD Site 346 from within the CNL. However, there is no in combination visibility of both CD Site 346 and the Lime Down Solar Sites from the CNL. The short term temporary landscape and visual effects of the Cable Route Corridor are set out in Section 8 of the LVIA in ES Volume, Chapter 8: Landscape and Visual [APP-060]. The landscape effects of the Cable Route Corridor are assessed as Minor / Negligible Adverse during Construction and Year 1 reducing to Negligible Neutral

				at Year 15 and decommissioning. Given the low level and temporary nature of the effects from the Cable Route Corridor and the fact there would be no direct effects on the CNL itself, there would be no long term cumulative effects on the setting of the CNL as a result of the Lime Down Scheme and CD Site 346.
NE-082	Soils and Agriculture	BMV Land	37.Soils and best and most versatile agricultural land – Amber a. We welcome that the siting and design of the proposed development has been informed by soil surveys to identify the location of Best and Most Versatile agricultural land within the Order Limits. Further information and quantification of effects is however required before Natural England can provide more detailed advice.	The Applicant makes note of this comment. The effects of the Scheme on Best and Most Versatile agricultural land have been assessed within the Environmental Statement, with the findings reported in **ES Volume 1, Chapter 17: Soils and Agriculture [APP-069]**, supported by **ES Volume 3, Appendix 17-1: Agricultural Land Classification and Soil Resource Survey Report [APP-243]**. Further detail in response to Natural England's comments on agricultural land and soil resources is provided within the Applicant's responses set out below.
NE-083	Soils and Agriculture	ALC Surveys	b. We note that there are areas of the Order Limits which have not yet been subject to detailed soil surveys. Natural England would advise that for all areas of agricultural land subject to temporary and permanent loss, in which Post-1988 ALC survey information is not available, an ALC survey should be undertaken. We note that surveys of the Cable Route Corridor are ongoing. The full results of surveys should be provided to inform the assessment of potential effects of the proposed development on Best and Most Versatile agricultural land.	The agricultural land classification survey methodology was agreed in principle with Natural England [TN1.1] in meetings conducted on Microsoft Teams on the 21st February 2024 and the 5th September 2024. This included a reduced survey density within the Solar PV panel areas and a targeted survey approach within the Cable Route Corridor, with detailed surveys undertaken in areas of long term built development. Discussions with Natural England about additional survey requirements are ongoing. The results of the agricultural land classification and soil surveys undertaken to date, including borehole logs, laboratory analysis results and photographs, are reported in **ES Volume 3, Appendix 17-1: Agricultural Land**

				Classification and Soil Resource Survey Report [APP-243]. This information has informed the assessment of effects on agricultural land and soils set out in **ES Volume 1, Chapter 17: Soils and Agriculture [APP-069]**. No additional agricultural land classification surveys are currently being undertaken within the Cable Route Corridor beyond those reported.
NE-084	Soils and Agriculture	ALC Surveys	c. Further, to aid in assessing the effects of the proposed development, the land take in hectares of each part of the development should be presented (ie. Solar PV area, cable route, access tracks, substations, BESS, construction compounds, enhancement areas etc.). This is due to the varying effects of different elements of the development on soil health. Within each category, the area of land of each ALC grade affected and whether this is a permanent or temporary loss should be presented.	The effects of the Scheme on soils and agricultural land, including land take by individual elements of the development and the agricultural land classification grades affected, are assessed in **ES Volume 1, Chapter 17: Soils and Agriculture [APP-069]**, supported by **ES Volume 3, Appendix 17-1: Agricultural Land Classification and Soil Resource Survey Report [APP-243]**. An updated version of **ES Volume 1, Chapter 17: Soils and Agriculture**, which presents land take by different components of the Scheme, expressed in hectares and distinguishing between temporary and permanent effects, will be submitted by the Applicant at Deadline 1. This updated assessment provides further clarity on land take across the Solar PV areas, cable route corridor and associated infrastructure.

NE-085	Soils and Agriculture	BMV Land	d. Further, the criteria for determining the receptor sensitivity and magnitude of change for soil impacts used in the Environmental Statement should be reviewed. Soils of ALC Grade 1 & 2 should be assessed as being of very high sensitivity, and soils of ALC Grade 3a should be assessed as high sensitivity. Further the magnitude of impact of a permanent loss of BMV agricultural land should be of more than 20ha BMV land should be assessed as major.	The criteria used to determine receptor sensitivity and magnitude of change for soil and agricultural land impacts have been reviewed and will be amended to align with Natural England's advice. In particular, the sensitivity of agricultural land receptors and the magnitude thresholds applied to permanent loss of BMV land will be updated within **ES Volume 1, Chapter 17: Soils and Agriculture [APP-069]**, to fully align with IEMA guidance. An updated version of **ES Volume 1, Chapter 17: Soils and Agriculture** reflecting these changes will be submitted by the Applicant at Deadline 1. The revised chapter will set out the amended assessment methodology and apply it to the Scheme, with supporting agricultural land classification data provided in **ES Volume 3, Appendix 17-1: Agricultural Land Classification and Soil Resource Survey Report [APP-243]**. • Summary of changes to assessment outcomes: Grade 1 and Grade 2 were assessed as High sensitivity but will be assessed as Very High sensitivity. • Subgrade 3a was assessed as Medium sensitivity but will be assessed as High sensitivity. • Subgrade 3b was assessed as Low sensitivity but will be assessed as Medium sensitivity. • Grade 4 and Grade 5 were assessed as Very Low sensitivity but will be assessed as Low sensitivity. • Very Low sensitivity will be removed. • The criteria for a High magnitude of change will be amended from more than

				50 hectares of agricultural land affected to more than 20 hectares. • The criteria for a Medium magnitude of change will be amended from between 20 and 50 hectares of agricultural land affected to between 5 and 20 hectares. • The criteria for a Low magnitude of change will be amended from between 5 and 20 hectares of agricultural land affected to less than 5 hectares. • The criteria for a Negligible magnitude of change will be amended from less than 5 hectares of agricultural land affected, to no discernible loss. There will be no amendment to the significance matrix other than the headers for the sensitivity categories. There is no change to the assessment of effects as are reported in **ES Volume 1, Chapter 17: Soils and Agriculture [APP-069]**.

3.4 Cotswolds National Landscape Board

Table 3-4 RR-0944

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
CNL-001	Description and DCO Process	Introduction	The Cotswolds National Landscape Board ('the Board') understands that above proposed Solar Park 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 Net Zero. As a statutory consultee, the Board wishes to register as an interested party for the DCO examination. This response comprises the Board's Relevant Representations, outlining relevant planning policy and guidance relating to the Cotswolds National Landscape ('CNL') designation as well as the matters that the Board recommends should be considered in the DCO Examination. The Board understands that there will be a further opportunity to provide more detailed comments in response to the Examining Authorities' questions later in the Examination period.	The Applicant notes this comment and welcomes continued engagement with Cotswolds National Landscape Board.
CNL-002	Description and DCO Process	Introduction	The Cotswolds National Landscape Board The Cotswolds National Landscape Board was established by Parliament in 2004 as the Cotswolds Conservation	The Applicant notes this comment.

			Board and has two statutory purposes; firstly, to conserve and enhance the natural beauty of the Cotswolds National Landscape; and secondly to increase the understanding and enjoyment of the special qualities of the Cotswolds National Landscape. Further information about the Board can be found in Appendix 3 of the Cotswolds National Landscape Management Plan 2025-2030 (https://www.cotswolds-nl.org.uk/wp/wp-content/uploads/2025/11/CNL-MANAGEMENT-PLAN_2025-30-FINAL.pdf).	
CNL-003	Landscape and Visual	National Policy Statements Relating to National Landscapes (NPS EN-1)	NPS EN-1 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. 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.	The Applicant notes this comment.

CNL-004	Landscape and Visual	National Policy Statements Relating to National Landscapes (NPS EN-1)	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.	The Applicant notes this comment. The LVIA methodology set out in **ES Volume 2, Appendix 8.1 [APP-187]** shows how the assessment of effects combines the level of sensitivity and magnitude of change proposed by the development to inform judgements on landscape effects.

CNL-005	Landscape and Visual	National Policy Statements Relating to National Landscapes (NPS EN-1)	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.	The value of the Landscape associated with the Scheme has been robustly assessed within **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]** and **ES Volume 3, Appendix 8-3-2-2 [APP-191]**. A standalone Assessment on the Cotswold National Landscape (CNL) and its Special Qualities has been undertaken **in ES Volume 3, Appendix 8-6 [APP-197]**
				
				The Scheme has been designed sensitively to avoid harm to the CNL. Following the mitigation hierarchy, avoidance measures have been the primary way of avoiding harm. These measures are set out in Section 8.9 of the LVIA as presented in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]** and include:
				• the removal of panels within the setting of the CNL in Sites A, B and C where there is a strong visual relationship between the CNL and the Scheme. This includes:
				  ○ Site A: The northern part of fields A1, A11 and A12;
				  ○ Site B: B12; and
				  ○ Site C: C1, C6, C8, part of C9 and the majority of C10.
				• Panels in C2, C3 and C4 which are not on the boundary of the CNL, but are where significant visual effects on receptors within the CNL were recorded at PEIR were subsequently removed from

				the Scheme following Statutory Consultation.
CNL-006	Landscape and Visual	National Policy Statements Relating to National Landscapes (NPS EN-1)	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.	The Applicant notes this comment. Lime Down Sites A, B and C are within the setting of the CNL. Measures which seek to further the purposes of the designation within these Sites are set out in Section 3.5 of **ES Volume 3, Appendix 8.6 [APP-197].**
CNL-007	Landscape and Visual	National Policy Statements Relating to National Landscapes (NPS EN-1)	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	The Applicant notes this comment. Lime Down Sites A, B and C are within the setting of the CNL. Landscape measures to avoid and minimise harm to the CNL and its setting are set out in Section 3.5 of **ES Volume 3, Appendix 8.6 [APP-197].** It is recognised that there are some short-term construction effects within the CNL as a result of construction traffic and site access of abnormal loads. Details of this and the effect on the landscape are considered unavoidable, temporary, and not significant.

			reason for the Secretary of State to refuse consent.	
CNL-008	Landscape and Visual	National Policy Statements Relating to National Landscapes (NPS EN-1)	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).	The LVIA includes an Appendix which considers the landscape and visual effects of the Scheme on the CNL and its special qualities. Please refer to **ES Volume 3, Appendix 8-6 [APP-197].** The assessment on the special qualities includes multidisciplinary input as appropriate to the individual special quality. The impact of noise emissions on residential amenity and sensitive receptors is considered in **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]** with details on how these impacts will be minimised presented in Section 14.9. The impacts of noise and artificial lighting on ecological features are assessed in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061**]. The assessment concludes that there would be no significant effects from these potential sources of impact on ecological features.

CNL-009	Landscape and Visual	National Policy Statements Relating to National Landscapes (NPS EN-3)	NPS EN-3 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.	Although NPS EN-3 2025 (effective 6 January 2026) is now the primary decision-making document for nationally significant onshore and offshore renewable energy projects in England and Wales as the Lime Down Scheme was accepted for Examination before the update takes effect the 2024 NPS versions will continue to apply. Working alongside EN-1,EN3 accelerates deployment by streamlining consenting for solar (>100MW in England) to meet net-zero goals. Paragraph 2.10.96 is now found at paragraph 2.10.88. and is unchanged. In response to Paragraph 2.10.96, the Applicant has undertaken considerable pre application consultation with CNL and Wiltshire as set in **ES Volume 3, Appendix 8-5 [APP-196].**
CNL-010	Landscape and Visual	National Policy Statements Relating to National Landscapes (NPS EN-3)	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).	A landscape and visual assessment forms **ES Volume 1 Chapter 8: Landscape and Visual [APP-060].** The chapter, particularly the Visual Assessment, is supported by Visualisations which are presented in **ES Volume 2, Figure 8-14 [APP-103] to ES Volume 2, Figure 8-14 [APP-105].** The LVIA includes visualisations from 32 of the 69 Viewpoints. Photomontages produced as part of the LVIA (**ES Volume 2, Figure 8-14 [APP-103 to APP-105])**, as well as additional heritage viewpoints (a list of which is provided in **Annex E of ES Volume 3,**

				Appendix 12.1: Heritage Statement [APP-219]) were used to inform **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, which is supported by **ES Volume 3, Appendix 12.1: Heritage Statement [APP-219]**.

CNL-011	Landscape and Visual	National Policy Statements Relating to National Landscapes (NPS EN-3)	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 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.	The Scheme has been designed sensitively to avoid harm to the CNL. Following the mitigation hierarchy, avoidance measures have been the primary way of avoiding harm. These measures are set out in Section 8.9 of **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]** and include:
				• The removal of panels within the setting of the CNL in Sites A, B and C where there is a strong visual relationship between the CNL and the Scheme. This includes:
				  ○ Site A: The northern part of fields A1, A11 and A12;
				  ○ Site B: B12; and
				  ○ Site C: C1, C6, C8, part of C9 and the majority of C10.
				• Panels in C2, C3 and C4 which are not on the boundary of the CNL, but are where significant visual effects on receptors within the CNL were recorded at PEIR were subsequently removed from the Scheme following Statutory Consultation.
				
				Measures for the implementation (including species and sizes),

				management, monitoring and replacement of landscape and ecological mitigation are set out in the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]**. This includes measures for protecting and retaining, wherever possible, the growth of vegetation on site boundaries, as well as the growth of existing hedges, established vegetation, including mature trees within boundaries within the Scheme. The measures set out within the OLEMP are secured by Requirement 7 of the **Draft DCO [APP-016]** which requires a detailed LEMP to be produced post consent. The detailed LEMP must be substantially in accordance with the **Outline LEMP [APP-283**] and be implemented as approved, as secured by Requirement 7 of the **Draft DCO [APP-016].**
CNL-012	Landscape and Visual	The Board's Status, Policies and Guidance	The Board is a statutory consultee on 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 (AONB). In reaching his decision in respect of this DCO application, the Secretary of State for Energy Security and Net Zero has a statutory duty to seek to further the statutory purpose of conserving and enhancing the natural beauty of the Cotswolds National Landscape ('the duty') and the Secretary of State should explicitly address the duty within the DCO	Under NPS EN-1, the Secretary of State in fulfilling this duty 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 (5.10.8). It is within this context that the duty must be considered in relation to CNL NSIPs. Section 3.5 of **ES Volume 3, Appendix 8-6 [APP-197]** of the LVIA sets out how the Scheme contributes to furthering the statutory purpose of conserving and enhancing the natural beauty of the Cotswolds National Landscape which has been informed by the CNL Nature Recovery Strategy, the Cotswolds

			decision letter, including an explanation of how he considers the duty has been discharged.	Management Plan and associated guidance including the Landscape Strategy and Guidelines. The CNL Board note below "Embedded mitigation measures principally comprise a range of offsets and buffers and specific landscape design parameters outlined in Tables 7 and 8 **of ES Volume 3, Appendix 8-6 [APP-197].** These include retention and enhancement of the existing landscape framework to gap up existing hedgerows and provide new tree lines to increase age and species diversity. The embedded mitigation also includes new planting to both mitigate the visual effects of the Scheme and provide landscape benefits including the re-establishment of historic hedgerows within the setting of the CNL, new areas of native woodland, trees, scrub and grassland, new planting within riparian corridors to enhance rivers and wetland, as well the restoration of dry-stone walls and creation of new/reestablishment of historic ponds."
CNL-013	Landscape and Visual	The Board's Status, Policies and Guidance	Further information on this duty can be provided by the Board and the Board recommends that in making his decision he should also take into account the following Board publications: • Cotswolds National Landscape Management Plan 2025-2030 (https://www.cotswolds-nl.org.uk/wp/wp-content/uploads/2025/11/CNL-MANAGEMENT-PLAN_2025-30-FINAL.pdf); in particular Policies CE1 (Landscape), CE5 (Tranquillity), CE6 (Dark Skies), CE8 (Nature Recovery and	The Applicant notes this comment and that the Secretary of State must also consider this duty in accordance with NPS EN-1, which recognises a proportionate approach must be taken with Solar NSIPs. The applicant has specifically referenced the majority of the Boards publications in **ES Volume 3, Appendix 8-6 [APP-197].** The full list has been taken account of throughout the iterative design process

			Biodiversity) and CE13 (Development and infrastructure - principles); • Cotswolds AONB Landscape Character Assessment (https://www.cotswolds-nl.org.uk/about-the-cotswolds-national-landscape/landscape-character-assessment/) particularly, in this instance, with regards to Landscape Character Types (LCT) 11 (Dip-Slope Lowland) and 14 (Cornbrash Lowlands) in relation to Site A, Site B and Site C and LCT 9 (High Wold Dip Slope) and 11 (Dip Slope Lowland) in relation to the construction traffic access route; • Cotswolds AONB Landscape Strategy and Guidelines (https://www.cotswolds-nl.org.uk/about-the-cotswolds-national-landscape/landscape-character-assessment/landscape-strategy-and-guidelines/) particularly, in this instance, with regards to LCT 9 (https://www.cotswolds-nl.org.uk/wp/wp-content/uploads/2025/02/lct-9-high-wold-dip-slope-2016.pdf), including Sections 9.13 and 9.14, LCT 11 (https://www.cotswolds-nl.org.uk/wp/wp-content/uploads/2025/02/lct-11-dipslope-lowland-june-2016.pdf), including Sections 11.4, 11.12 and 11.13 and LCT 14 (https://www.cotswolds-nl.org.uk/wp/wp-content/uploads/2025/02/lct-14-cornbrash-pastoral-lowlands-june-2016.pdf), including Section 14.4; • Cotswolds AONB Local Distinctiveness and Landscape Change (https://www.cotswolds-nl.org.uk/about-the-cotswolds-national-landscape/landscape-character-assessment/local-distinctiveness-	and have steered the design and the approach to mitigation.

			landscape-change-report/); • Cotswolds National Landscape Climate Change Strategy (https://www.cotswolds-nl.org.uk/wp/wp-content/uploads/2024/11/CNL-Climate-Change-Strategy-Adopted-Feb-2022.pdf); • Cotswolds Nature Recovery Plan (https://www.cotswolds-nl.org.uk/wp/wp-content/uploads/2024/11/Cotswolds-Nature-Recovery-Plan-Full-Version.pdf); • Cotswolds National Landscape Board Position Statements particularly, in this instance, with regards to the Renewable Energy Position Statement (https://www.cotswolds-nl.org.uk/wp/wp-content/uploads/2024/11/Renewable-Energy-June-2023.pdf), in particular section 3.4.4, Development in the Setting of the AONB (https://www.cotswolds-nl.org.uk/wp/wp-content/uploads/2024/11/setting-position-statement-2016-adopted-with-minor-changes-30616-1.pdf), Tranquillity Position Statement (https://www.cotswolds-nl.org.uk/wp/wp-content/uploads/2024/11/Tranquillity-Position-Statement-FINAL-June-2019.pdf) sections 4.4 and 5.2, Dark Skies and Artificial Light Position Statement (https://www.cotswolds-nl.org.uk/wp/wp-content/uploads/2024/11/Cotswolds-Dark-Skies-Artificial-Light-Position-Statement.pdf) and its appendices and Tree Species and Provenance (https://www.cotswolds-nl.org.uk/wp/wp-content/uploads/2024/11/Position-Statement-on-Tree-Species-and-Provenance-June-2017-0723.pdf).	

CNL-014	Landscape and Visual	The Board's Position on Large-Scale Solar Energy Proposals (Cotswolds National Landscape Management Plan 2025-2030)	The Board's position on large-scale solar energy proposals. The Board's Vision, outlined at Section 2 of the Cotswolds National Landscape Management Plan 2025-2030, 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 Cotswolds National Landscape will have reached net zero (or better) by 2050 (or sooner) through the collective efforts of stakeholders following a clearly defined pathway, while also building resilience to the impacts of climate change.	The Applicant notes the Cotswolds National Landscape Boards position on large-scale solar energy proposals as outlined in the Cotswolds National Landscape Management Plan 2025-2030.

CNL-015	Landscape and Visual	The Board's Position on Large-Scale Solar Energy Proposals (Cotswolds National Landscape Management Plan 2025-2030)	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.	The Scheme has been sensitively designed to both avoid harm and to conserve and enhance the natural beauty of the CNL. Section 3.5 of **ES Volume 3, Appendix 8-6** of the LVIA **[APP-197]** sets out how the Scheme achieves this.

CNL-016	Landscape and Visual	The Board's Position on Large-Scale Solar Energy Proposals (Cotswolds National Landscape Management Plan 2025-2030)	Management Plan policy CC1 advocates 'generating and distributing 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 (REPS), wherein paragraph 3.4.4.13 details the Board's present 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 the REPS was principally intended to outline the Board's position regarding renewable energy proposals within the CNL, the Board considers this to be an appropriate position relating to proposals which lie within the CNL's setting and have the potential to impact the CNL.	Lime Down Sites A, B and C are within the setting of the CNL. The Scheme has been robustly assessed within **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**. A standalone Assessment on the CNL and its Special Qualities has been undertaken in **ES Volume 3, Appendix 8-6 [APP-197]**. The assessment of effects in section 2.4 of **ES Volume 3, Appendix 8-6 [APP-197]** shows there would beneficial effects to the Landscape Fabric of the Lime Down Sites A-C which are derived from the extensive mitigation measures embedded in the Scheme which includes protection of the existing features of the Site and new planting, including trees, hedgerows and woodland, as well as improvements to watercourses and the extensive change in land use to grassland under solar panels and the conversion to grassland meadows on the edge of the CNL as shown on **ES Volume 2, Figure 3-4 Landscape and Ecology Mitigation Plan** [**APP-084]**. Moderate Adverse (Significant) Effects were recorded within the 1km Study Area of Sites A, B, and C, which includes the part of CNL. However, there is no physical overlap between the Scheme and the CNL, and consequently the Scheme causes no direct impacts on the CNL. Avoidance measures to reduce adverse effects on the CNL are embedded within the Scheme and are set out in Section 2.3 of **ES Volume 3, Appendix 8-6 [APP-197]** and provide an extensive buffer to development on the

				edge of the CNL. The assessment of effects in section 2.4 of **ES Volume 3, Appendix 8-6 [APP-197]** therefore focuses principally on the how the character is perceived with regard to Local Landscape Character Areas (LLCA) that would potentially be indirectly impacted upon by the Scheme. Accordingly, these are principally affected due to intervisibility with the Scheme and the visual effects on sensitive receptors. The **ES Volume 3, Appendix 8-6 Assessment of Effects on the Cotswolds National Landscape and its Special Qualities [APP-197]** identified a number of receptors where Moderate Adverse (Significant) effects would be experienced during the Construction and Operation Phase 1. Construction effects would be temporary in nature and, at the start of the Operation phase, infrastructure would be visible to varying degrees as mitigation planting would have a limited effect initially. However, once mitigation planting matures the magnitude of change would reduce to Very Low and the effects at Year 15 would reduce to Minor and Neutral in nature, with no effects identified during decommissioning. As such, there would be no significant long-term effects on the CNL and its natural beauty, or its setting.

CNL-017	Landscape and Visual	Cotswolds National Landscape Management Plan, Climate Change Strategy and Position Statements	Cotswolds National Landscape Management Plan, Climate Change Strategy and Position Statements. The Cotswolds National Landscape Management Plan 2025-2030 is a material consideration in planning decision making. Policy CE1 states that proposals that have the potential to impact on, or create change in, the landscape of the Cotswolds National Landscape, should be delivered in a way that is compatible with and seek to further the conservation and enhancement of the landscape character of the location, as described by the CNL Board's Landscape Character Assessment and Landscape Strategy and Guidelines. There should be a presumption against the loss of key characteristics identified in the landscape character assessment.	The Cotswolds National Landscape Management Plan 2025-2030 and the CNL Board's Landscape Character Assessment and Landscape Strategy and Guidelines have been used to inform the landscape led approach to the Scheme. There are no direct effects on the landscape character of the CNL and hence no loss of its key characteristics. These documents as well as the CNL Nature Recovery Plan have informed the approach to mitigation and assessment approach as set out in the standalone **ES Volume 3, Appendix 8-6: Assessment of Effects on the Cotswolds National Landscape and its Special Qualities [APP-197].**
CNL-018	Landscape and Visual	Cotswolds National Landscape Management Plan, Climate Change Strategy and Position Statements	Proposals that have the potential to impact on, or create change in, the landscape of the CNL, should seek to further the conservation and enhancement of the scenic quality of the location and its setting, views, including those into and out of the National Landscape and visual amenity.	Views to and from the CNL have been assessed and are included in Section 2.4 of **ES Volume 3, Appendix 8-6 [APP-197].** The extensive mitigation measures within Sites A-C within the setting of the CNL are set out in Section 3.5 of **ES Volume 3, Appendix 8.6 [APP-197].** The mitigation measures provide conservation and enhancement of the CNL's scenic qualities by improving and extending the character of the CNL into its setting within the Scheme.

CNL-019	Landscape and Visual	Cotswolds National Landscape Management Plan, Climate Change Strategy and Position Statements	The Board's Tranquillity Position Statement recommends that proposals that have the potential to impact on the tranquillity of the National Landscape accord with Policy CE5 of the Cotswolds National Landscape Management Plan 2025-2030 and be delivered in a way that is compatible with and seek to further the conservation and enhancement of this tranquillity, by seeking to avoid and where avoiding is not possible, minimise noise and other aural and visual disturbance.	Tranquillity (SQ9) is one of the Special Qualities of the CNL which has been considered within the Assessment of effects on the CNL National Landscape in section 3 of **ES Volume 3, Appendix 8-6 [APP-197].** The assessment considers the effects of the Scheme in landscape and visual terms but does not assess the effects of the temporary construction effects of additional traffic within the CNL. To address this, the Applicant has prepared a Technical Note on Tranquillity which signposts to where in the Application documents the effects of the Scheme on Tranquillity can be found. The Technical Note also contains a review of how the project has been considered and is aligned with the CNL's Position Statement on Tranquillity. It will be Submitted at deadline A.
CNL-020	Landscape and Visual	Cotswolds National Landscape Management Plan, Climate Change Strategy and Position Statements	Policy CE8 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 CNL and in its setting. This should be achieved in accordance with the outcomes, priorities, targets and measures within the Cotswolds Nature Recovery Plan and Local Nature Recovery Strategies (LNRSs), and focus on the priority species and habitats listed in Appendix 8 of the CNL Management Plan.	The Applicant notes this comment and considers the comprehensive package of habitat creation and enhancement measures shown in **ES Volume 2, Figure 3-4: Landscape and Ecology Mitigation Plan [APP-084]** and detailed in the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]** complement the Cotswolds National Landscape Management Plan. In particular, the Scheme is expected to deliver considerable new and enhanced flower-rich grassland and hedgerow habitat which are key targets of the Management Plan. The Applicant will continue to consult the CNL Management Plan and Cotswolds Nature Recovery

				Plan during the preparation of the detailed Landscape and Ecological Management Plan, which will need to substantially in accordance with the **OLEMP [APP-283]** secured through Requirement 7 in Schedule 2 of the **Draft Development Consent Order [APP-016]**. The Applicant welcomes the opportunity to prepare the detailed Landscape and Ecological Management Plan in continued consultation with CNL.
CNL-021	Landscape and Visual	Cotswolds National Landscape Management Plan, Climate Change Strategy and Position Statements	Proposals that have the potential to impact on the biodiversity of the National Landscape should seek to further the conservation and enhancement of this biodiversity. They should have regard to – and be consistent with – the CNL Management Plan and guidance including the Cotswolds Nature Recovery Plan. Measures to conserve and restore biodiversity including the outcomes, priorities, targets and measures within the Cotswolds Nature Recovery Plan should be delivered in a way that is compatible with conserving and enhancing the natural beauty of the Cotswolds National Landscape.	The Applicant notes this comment and considers the comprehensive package of habitat creation and enhancement measures shown **in ES Volume 2, Figure 3-4: Landscape and Ecology Mitigation Plan [APP-084]** and detailed in the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]** complement the Cotswolds National Landscape Management Plan. In particular, the Scheme is expected to deliver considerable new and enhanced flower-rich grassland and hedgerow habitat which are key targets of the Management Plan. The Applicant will continue to consult the CNL Management Plan and Cotswolds Nature Recovery Plan during the preparation of the detailed Landscape and Ecological Management Plan, which will need to substantially in accordance with the **OLEMP [APP-283]** secured through Requirement 7 in Schedule 2 of the **Draft Development Consent Order [APP-016].**

CNL-022	Landscape and Visual	Cotswolds National Landscape Management Plan, Climate Change Strategy and Position Statements	Policy CE13 states that development and infrastructure proposals in the Cotswolds National Landscape and in the setting of the National Landscape should be delivered in a way that is compatible with and seeks to further the conservation and enhancement of the natural beauty of the CNL including its special qualities. In doing so, they should have regard to – and be compatible with the CNL Management Plan and guidance produced by the CNL Board, including the: (i) Cotswolds AONB Landscape Strategy and Guidelines (LS&G); (ii) Cotswolds AONB Landscape Character Assessment; (iii) Cotswolds Nature Recovery Plan; (iv) Cotswolds AONB Local Distinctiveness and Landscape Change; (v) Cotswolds National Landscape Board Position Statements; (vi) CNL Pathway to Net Zero and (vii) CNL Climate Change Strategy.	Policy CE13 was considered as part of the iterative design process in order to avoid harm and further the conservation and enhancement of the natural beauty of the CNL. The effect of the Scheme on the CNL and its Special Qualities is set out in section 3 of **ES Volume 3, Appendix 8-6 [APP-197].** The appendix forms a standalone assessment on the CNL and demonstrates how the scheme has regarded and is compatible with the key publications produced by the CNL Board.
CNL-023	Landscape and Visual	Cotswolds National Landscape Management Plan, Climate Change Strategy and Position Statements	Development and infrastructure proposals in the CNL should be delivered in a way that is compatible with and seeks to further the purpose of increasing the understanding and enjoyment of the CNL's special qualities. They should also contribute to the economic and social wellbeing of CNL communities, in a way that is compatible with conserving and enhancing the natural beauty of the CNL.	The Scheme has been landscape led with careful attention to the CNL by avoiding harm and by furthering the purpose of increasing the understanding and enjoyment of the CNL's special qualities and conserving and enhancing the natural beauty of the CNL. The effect of the Scheme on the CNL and its Special Qualities is set out in section 3 of **ES Volume 3, Appendix 8-6 [APP-197].** The appendix forms a standalone assessment on the CNL. Special Quality 12: An accessible landscape - Quiet recreation and routes

				(e.g. Cotswold Way, PROW) relates specifically to the CNL's purpose of increasing the understanding and enjoyment of the CNL's special qualities. The assessment sets out a number of 'Positive Outcomes' (Paragraphs 3.4.93-3.4.96) which include landscape enhancements, the provision of new non-vehicular permissive paths to provide pedestrians and riders improved accessibility to the countryside and improved connectivity to the wider PRoW network as well numerous other socio-economic benefits.
CNL-024	Landscape and Visual	Cotswolds National Landscape Management Plan, Climate Change Strategy and Position Statements	Development and infrastructure proposals in the CNL and its setting should comply with relevant national planning policy and guidance, particularly with regards to those paragraphs of the National Planning Policy Framework (NPPF) that relate to national landscapes.	The applicant has had regard to the NNPF which states: "*Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and National Landscapes which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas, and should be given great weight in National Parks and the Broads. The scale and extent of development within all these designated areas should be limited, while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas*"**.** It is agreed that Lime Down Sites A, B and C are within the setting of the CNL. Landscape measures to avoid and minimise harm to the CNL and its setting are set out in Section 3.5 of **ES Volume**

				3, Appendix 8.6 [APP-197]
CNL-025	Landscape and Visual	Cotswolds National Landscape Management Plan, Climate Change Strategy and Position Statements	A landscape-led approach should be applied to the planning, design and implementation of development and infrastructure proposals in the CNL and its setting, proportionate to the type and scale of development being proposed, whereby proposals: a) Address the natural beauty of the CNL as primary consideration at all stages of the development process, from initial conception through to implementation	In consultation with the CNL Board, the applicant has applied a landscape- led approach at all phases of the development which address the natural beauty of the CNL as primary consideration- especially in Sites A, B and C within the setting of the CNL. The Cotswolds National Landscape Management Plan 2025-2030 and the CNL Board's Landscape Character Assessment and Landscape Strategy and Guidelines have been used to inform the landscape led approach to the Scheme. There are no direct effects on the landscape character of the CNL and hence no loss of its key characteristics. These documents as well as the CNL Nature Recovery Plan have informed the approach to mitigation and assessment approach as set out in the standalone **ES Volume 3, Appendix 8-6: Assessment of Effects on the Cotswolds National Landscape and its Special Qualities [APP-197]**
CNL-026	Landscape and Visual	Cotswolds National Landscape	b) Address all of the factors that contribute to the natural beauty of the area	The applicant considers that all of the factors that contribute to the natural beauty of the area are encompassed within the Special qualities of the CNL. The effect of the Scheme on these qualities has been robustly assessed with the standalone assessment in **ES Volume 3, Appendix 8-6: Assessment of Effects on the Cotswolds National**

				Landscape and its Special Qualities [APP-197].
CNL-027	Landscape and Visual	Cotswolds National Landscape	c) Address access to natural beauty including the character of the public rights of way network and its role within wider green infrastructure	The effect of the Scheme on the CNL and its Special Qualities is set out in section 3 of **ES Volume 3, Appendix 8-6 [APP-197].** The appendix forms a standalone assessment on the CNL. Special Quality 12: An accessible landscape - Quiet recreation and routes (e.g. Cotswold Way, PROW) relates specifically to access to natural beauty within the CNL. The assessment sets out a number of 'Positive Outcomes' (Paragraphs 3.4.93- 3.4.96) which include landscape enhancements, the provision of new non-vehicular permissive paths to provide pedestrians and riders improved accessibility to the countryside and improved connectivity to the wider PRoW network as well numerous other socio-economic benefits which would improve the character of the rights of way network within the setting of the CNL.
CNL-028	Landscape and Visual	Cotswolds National Landscape	d) Reflect and enhance the character of the local area	The Cotswolds National Landscape Management Plan 2025-2030 and the CNL Board's Landscape Character Assessment and Landscape Strategy and Guidelines have been used to inform the landscape led approach to the Scheme. These documents as well as the CNL Nature Recovery Plan have informed the approach to mitigation to reflect and enhance the area. These measures are set out in the standalone **ES Volume 3,**

				Appendix 8-6: Assessment of Effects on the Cotswolds National Landscape and its Special Qualities [APP-197

CNL-029	Landscape and Visual	Cotswolds National Landscape	e) Avoid adverse effects where possible and, if adverse effects can't be avoided, minimise them	The Scheme has been designed sensitively to avoid harm to the CNL. Following the mitigation hierarchy, avoidance measures have been the primary way of avoiding harm. These measures are set out in Section 8.9 of **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]** and include:
				• The removal of panels within the setting of the CNL in Sites A, B and C where there is a strong visual relationship between the CNL and the Scheme. This includes:
				  ○ Site A: The northern part of fields A1, A11 and A12;
				  ○ Site B: B12; and
				  ○ Site C: C1, C6, C8, part of C9 and the majority of C10.
				• Panels in C2, C3 and C4 which are not on the boundary of the CNL,but are where significant visual effects on receptors within the CNL were recorded at PEIR were subsequently removed from the Scheme following Statutory Consultation.

CNL-030	Landscape and Visual	Cotswolds National Landscape	f) Seek opportunities to enhance the natural beauty of the CNL and g) Deliver more beneficial effects than adverse effects for the natural beauty of the CNL.	The assessment of effects in section 2.4 **[APP-197]** shows there would beneficial effects to the Landscape Fabric of the Lime Down Sites A-C which are derived from the extensive mitigation measures embedded in the Scheme which includes protection of the existing features of the Site and new planting, including trees, hedgerows and woodland, as well as improvements to watercourses and the extensive change in land use to grassland under solar panels and the conversion to grassland meadows on the edge of the CNL as shown on **ES Volume 2, Figure 3-4 Landscape and Ecology Mitigation Plan [APP-084]**. The Applicant considers the delivery of these beneficial effects would enhance the natural beauty of the CNL's setting and in conjunction with the avoidance measures set out above would Deliver more beneficial effects than adverse effects for the natural beauty of the CNL.
CNL-031	Landscape and Visual	Cotswolds National Landscape	The Board's Climate Change Strategy, adopted in February 2022, highlights how there are opportunities within the Cotswolds to exploit sources of low carbon energy which are, in the right location, consistent with National Landscape designation and can help meet local demand.	The Applicant notes this comment.
CNL-032	Landscape and Visual	Cotswolds National Landscape	The Board's Renewable Energy Position Statement (REPS, adopted in June 2023, identifies how renewable energy will play an important role in mitigating the impacts of climate change and achieving Net Zero in the Cotswolds National Landscape and	The Applicant notes this comment.

			its setting but how generating energy from low carbon sources should be in a manner consistent with the purpose of National Landscape designation.	
CNL-033	Landscape and Visual	Cotswolds National Landscape	As referenced above, paragraph 3.4.4.13 of the REPS details the Board's position on large-scale solar energy proposals such as Lime Down. 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".	The Applicant notes this comment.
CNL-034	Landscape and Visual	Development within the Setting of the Cotswolds National Landscape	Development within the setting of the Cotswolds National Landscape 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, including the Cotswolds National Landscape. 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.	The Applicant notes this comment.
CNL-035	Landscape and Visual	Development within the Setting of the Cotswolds National Landscape	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 part of the Lime Down	The Applicant notes this comment.

			proposal lies within the National Landscape's setting and a development of the scale proposed could potentially have a significant adverse impact on its landscape and visual character and quality.	
CNL-036	Landscape and Visual	Development within the Setting of the Cotswolds National Landscape	Furthermore, 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" was also added into what is now paragraph 189 with the July 2021 publication of the NPPF. Therefore, any adverse effects on the National Landscape need to be assessed properly and fully taken into account when determining this application, with the appropriate weighting applied in the decision.	The Applicant notes this comment.
CNL-037	Landscape and Visual	Development within the Setting of the Cotswolds National Landscape	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.	Views to and from the CNL have been assessed and are included in Section 2.4 of **Appendix 8-6 Assessment of Effects on the Cotswolds National Landscape and its Special Qualities [APP-197]**. The extensive mitigation measure within Sites A-C within the setting of the CNL are set out in Section 3.5 of **Appendix 8-6 Assessment of Effects on the Cotswolds National Landscape and its Special Qualities [APP-197]**. The mitigation measures provide conservation and enhancement of the CNLs scenic qualities by improving and extending the character of the CNL into its setting within the Scheme.

CNL-038	Landscape and Visual	Development within the Setting of the Cotswolds National Landscape	The National Planning Policy Guidance ('NPPG', 2014, Paragraph: 039 Reference ID: 8-039-20190721) also confirms in relation to the former Section 85 duty (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	The NPPG has been updated. Paragraph 39 was revised on 29 January 2025 and refers to the updated statutory duty under section 85 of the Countryside and Rights of Way Act 2000 as it applies to local planning authorities for National Landscapes.
CNL-039	Landscape and Visual	Development within the Setting of the Cotswolds National Landscape	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 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	The Applicant notes this comment.

			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.”.	
CNL-040	Landscape and Visual	High Court Decision (Stroud District Council v Secretary of State for Communities and Local Government (Gladman Development Ltd) February 2015)	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 are not relevant).	The Applicant understands the differing ways of assessing impacts on the setting of the National Landscape as clarified in the High Court decision above.
CNL-041	Landscape and Visual	Cotswolds National Landscape	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	The Applicant notes this comment. **ES Volume 3, Appendix 8-6 Assessment of Effects on the Cotswolds National Landscape and its Special Qualities [APP-197]**. assesses the effects of the Scheme on views from public viewpoints looking back to the CNL. The extensive mitigation measures within Sites A-C within the setting of the CNL are set out in Section 3.5 of **Appendix 8-6 Assessment of Effects on the Cotswolds National Landscape and its Special Qualities [APP-197]**. The

			or identified quality in the development plan.	mitigation measures provide conservation and enhancement of the CNLs scenic qualities by improving and extending the character of the CNL into its setting within the Scheme.
CNL-042	Description and DCO Process	The Cotswold National Landscape Board's Previous Representations Regarding the Proposed Lime Down Solar Park	The Board has made several previous representations relating to the Lime Down proposal including: • Stage One Community Consultation representations, dated 22 April 2024; • EIA Scoping Consultation representations, dated 12 August 2024; • Stage Two Community Consultation representations, dated 19 March 2025; and • Targeted Consultation representations, dated 16 June 2025.	The Applicant notes this comment.
CNL-043	Description and DCO Process	Potential Main Issues for Examination (PMIEs)	Potential Main Issues for Examination (PMIEs) On 8th August 2025 the applicant wrote to the Board to agree the Potential Main Issues for Examination (PMIEs), these being the issues between the applicant and the Board that may not be resolved prior to the Examination stage of the DCO process. The PMIE document and these Relevant Representations aim to help the Examining Authority identify which issues should be discussed during the Examination stage.	The Applicant notes this comment. PMIEs with CNL Board are set out in Section 2.2 of **Potential Main Issues for Examination [APP-289].**

CNL-044	Landscape and Visual	Table 2 Appendix A of the Applicant's Letter Written to the CNLB Outline Six PMIEs	Table 2 Appendix A of the applicant's letter to the Board outlined six PMIEs: 1) At that stage the Board considered that the proposal for the Scheme as consulted upon had the potential to give rise to significant adverse environmental effects upon the Cotswolds National Landscape (CNL) designation and its setting. It would also fail to further the purpose of the CNL designation in respect of the statutory duty outlined at s.85 of the Countryside and Rights of Way Act 2000.	The Applicant notes this comment.
CNL-045	Landscape and Visual	Table 2 Appendix A of the Applicant's Letter Written to the CNLB Outline Six PMIEs	2) The Board considered that Solar PV Panels should be removed from several fields that form part of the Solar PV Sites, in particular Fields A11, A12, C2, C3 and C4, to avoid significant adverse landscape and visual effects on the CNL and its setting. These areas should be identified for habitat enhancement to further the purpose of CNL designation.	The Applicant notes this comment.
CNL-046	Ecology and Biodiversity	Table 2 Appendix A of the Applicant's Letter Written to the CNLB Outline Six PMIEs	3) Pending the results of further assessment, the Board recommended that 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 Applicant notes this comment.
CNL-047	Landscape and Visual	Table 2 Appendix A of the Applicant's Letter Written to the CNLB Outline Six PMIEs	4) Construction traffic should be routed outside of the CNL to avoid significant adverse impacts upon its Tranquillity and landscape and scenic beauty.	The Applicant notes this comment
CNL-048	Ecology and Biodiversity	Table 2 Appendix A of the Applicant's Letter Written	5) The Board also recommended the removal of all panels from C2 on the northern side of the ridge running through	The Applicant has removed panels in C2 from the Scheme following consultation to reduce the visual impact of development

		to the CNLB Outline Six PMIEs	the field or in areas where skyline effects would be apparent and identify these fields for habitat enhancement.	on the visually sensitive north facing slope.
CNL-049	Landscape and Visual	Table 2 Appendix A of the Applicant's Letter Written to the CNLB Outline Six PMIEs	6) The Board also recommended possible removal of panels from the remainder of C6 and from C7 and C9 pending the results of further assessment.	The Applicant has removed the remaining panels in C6 and has tested the visibility of the panels within C7 and C9 through the development of sections which were shared with the Board during consultation in June 2025
CNL-050	Landscape and Visual	PMIEs	In our response to the applicant's letter sent via email on 14th August 2025, the Board added two further PMIEs relating to: 7. on-site (within the project red line) habitat enhancements including LEMP/CEMP, species lists and maintenance regimes; and	The Applicant notes this comment.
CNL-051	Landscape and Visual	PMIEs	8. agreed details regarding potential appropriate measures to compensate for the residual adverse effects of the development on the natural beauty of the CNL and its setting to enable the statutory duty to seek to further the conservation and enhancement of its natural beauty (Section 85 of the Countryside and Rights of Way Act 2000) to be discharged.	The Applicant notes this comment.

CNL-052	Landscape and Visual	CNLB Current Position on These Eight PMIEs Expanded Upon	Our current position on these eight PMIEs are expanded upon below. The Board's current position relating to the PMIEs between the Board and the Applicant This response and the Board's previous consultation responses have 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.	The Applicant notes this comment.
CNL-053	Landscape and Visual	CNLB Current Position on These Eight PMIEs Expanded Upon	Officers of the Board also met with representatives of Island Green Power and several of the consultant team in November 2025 to discuss the DCO submission and how it addresses the Board's previous feedback.	The Applicant notes this comment.
CNL-054	Landscape and Visual	CNLB Current Position on These Eight PMIEs Expanded Upon	The Board has agreed with the applicant that Lime Down A, B and C and parts of the Cable Route Search Corridor are located within the setting of the Cotswolds National Landscape. It is also agreed that sites D and E are not located within the setting of the Cotswolds National Landscape.	The Applicant agrees that Lime Down A, B and C and parts of the Cable Route Search Corridor are located within the setting of the Cotswolds National Landscape and that sites D and E are not.

CNL-055	Landscape and Visual	CNLB Current Position on These Eight PMIEs Expanded Upon	Appendix 8.6 of the Environmental Statement (APP-197) provides an Assessment of Effects on the CNL and its Special Qualities. Section 1.2 documents the consultation undertaken by the applicant with the Board and its response to issues raised. Sections 1.3 to 1.7 outline the legislation, planning policy and methodologies relating to the CNL and these are considered appropriate in their scope and content.	The Applicant notes this comment.
CNL-056	Landscape and Visual	Landscape and Visual Impacts (PMIE 1)	Landscape and Visual Impacts (PMIE 1) In reaching his decision in respect of this DCO application, the Secretary of State for Energy Security and Net Zero has a statutory duty to seek to further the statutory purpose of conserving and enhancing the natural beauty of the Cotswolds National Landscape.	The Applicant notes this comment.
CNL-057	Landscape and Visual	Landscape and Visual Impacts (PMIE 1)	DEFRA guidance states that 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.	The Applicant notes this comment.
CNL-058	Landscape and Visual	Landscape and Visual Impacts (PMIE 1) - Defra Guidance	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. As well as being applied within National Landscapes, the	It is agreed that the duty to further the statutory purpose of a National Landscape applies to land within the setting of the CNL and it is agreed that Sites A, B and C are within the setting of the CNL. Throughout the iterative design process, appropriate multipurpose avoidance and mitigation measures have been incorporated into the development of the layout. These mitigation measures have been embedded into the Scheme design

			'seek to further duty' also applies to functions undertaken outside of the designation boundary which affects land within a National Landscape.	and have looked to modify the scale and layout of the Scheme or introduce appropriate interventions in order to reduce significant adverse effects and to ensure compliance with planning policy for the CNL. These measures include the removal of panels within the setting of the CNL in Sites A, B, and C where there is a strong visual relationship between the CNL and the Scheme. This includes: • Site A: The northern part of fields A1, A11 and A12. • Site B: B12. • Site C: C1, C6, C8, part of C9 and the majority of C10. Rather than being removed from the Scheme these fields are proposed for positive enhancement to further the purposes of the CNL and include: • The creation of wildflower meadows on the edge of the CNL within the northern part of A1, C1, C6, C8, the southwestern part of C9 and B12; • The inclusion of wildflower meadow verges on the edge of set aside land in A11, A12 and C10 to provide attractive buffers in views from public roads; and • Hedgerow enhancements including the re-establishment of historic hedgerows within the setting of the CNL. These enhancements are considered to go beyond mitigation measures as mitigation can be achieved on the

				boundaries of field containing panels. The creation of new wildflower meadows, particularly the conversion of arable to wildflower pasture and hay meadow is an aspiration of the Cotswolds Nature Recovery Strategy. Wildflower field margins to cropland and managed as meadows which support invertebrates, farmland birds and predators are also noted as important habitats for Nature Recovery in the Cotswolds.
CNL-059	Landscape and Visual	Mitigation	Mitigation The applicant outlines at Section 2.3 of Appendix 8-6 of the Environmental Statement how the Scheme has been designed, as far as practicable, to avoid and reduce impacts and effects on the Cotswolds National Landscape through the process of embedding measures into the Scheme design. The mitigation hierarchy is to prevent/ avoid, mitigate and restore and finally offset or, failing that, compensate to reduce development impacts and control any negative effects on the environment.	The Applicant notes this comment.
CNL-060	Landscape and Visual	Mitigation	Avoidance 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.	The Applicant notes this comment.

CNL-061	Landscape and Visual	Mitigation	Embedded mitigation measures principally comprise a range of offsets and buffers and specific landscape design parameters outlined in Tables 7 and 8 of Appendix 8-6. These include retention and enhancement of the existing landscape framework to gap up existing hedgerows and provide new tree lines to increase age and species diversity. The embedded mitigation also includes new planting to both mitigate the visual effects of the Scheme and provide landscape benefits including the re-establishment of historic hedgerows within the setting of the CNL, new areas of native woodland, trees, scrub and grassland, new planting within riparian corridors to enhance rivers and wetland, as well the restoration of dry-stone walls and creation of new/reestablishment of historic ponds.	The Applicant notes this comment.
CNL-062	Landscape and Visual	Enhancements	Enhancements In order to 'further the purpose' of the Cotswolds National Landscape to conserve and enhance its natural beauty, as required by s.85 of the Countryside and Right of Way Act 2000, the applicant outlines how the Scheme also seeks to include positive enhancement measures which they state have been informed by the Cotswolds National Landscape Management Plan, the Cotswolds Nature Recovery Plan and the 'special qualities' of the National Landscape - those being the aspects of the area's natural beauty which make the area distinctive and which are considered valuable, especially at a national scale.	The Applicant notes this comment.

CNL-063	Landscape and Visual	Enhancements	The applicant outlines at paragraphs 2.3.20-2.3.21 specific enhancement measures including the creation of wildflower meadows on the edge of the CNL within the northern part of A1, C1, C6, C8, the southwestern part of C9 and B12, the inclusion of wildflower meadow verges on the edge of set aside land in A11, A12 and C10 to provide buffers in views from public roads; and maintaining hedgerows at their current height of c1.5m (or as existing if greater) bordering the CNL within Site C (including the northern boundary of C1) to maintain open views of the landscape within the setting of the CNL.	The Applicant notes this comment.

CNL-064	Landscape and Visual	Enhancements	The Board considers that maintaining hedgerows at their current height should not be considered as an enhancement to the CNL and its setting. This results in the enhancements proposed consisting of the creation of wildflower meadows in a few fields and creation of wildflower meadow verges in three fields, which arguably could also be considered mitigation given their purpose to 'provide attractive buffers [to the proposed solar development] in views from public roads on the edge of the CNL.	It is agreed that maintaining hedgerows at their current height as set out in paragraphs 2.3.20-2.3.21 of **ES Volume 3, Appendix 8-6 Assessment of Effects on the Cotswolds National Landscape and its Special Qualities [APP-197]** should not be considered as an enhancement to the CNL and its setting as this is the baseline position. However, it is important to note the different management regime proposed along the border of the CNL within Site C (including the northern boundary of C1) as this is different to the management of hedgerows within the remainder of the Scheme. This specific management on the edge of the CNL is to maintain open views across the landscape from within the CNL. As noted above, the creation of wildflower meadows and wildflower margins are considered to be enhancement measures which go beyond mitigation measures. Mitigation of the solar infrastructure can be achieved on the boundaries of field containing panels. The Applicant has maintained the fields on the edge of the CNL (where panels have been removed to avoid harm to the CNL) within the Scheme in order to provide positive enhancement. The creation of new wildflower meadows, particularly the conversion of arable to wildflower pasture and hay meadow is an aspiration of the Cotswolds Nature Recovery Strategy. Wildflower field margins to cropland and managed as meadows which support invertebrates, farmland birds and

				predators are also noted as important habitats for Nature Recovery in the Cotswolds. An added benefit of the wildflower margins is to provide an attractive buffer to the arable set aside land (not the solar development) in views from public roads.
CNL-065	Landscape and Visual	Enhancements	Moreover, in several places within the submission, mitigation measures and enhancement (considered to be measures which demonstrably add value to the host landscape, creating a positive change above its baseline condition) measures appear to be conflated.	NPS EN-1 recognises at para 5.10.5 that *"Virtually all nationally significant energy infrastructure projects will have adverse effects on the landscape, but there may also be beneficial landscape character impacts arising from mitigation."* It is well recognised that it is very difficult to separate which proposed measures

				are mitigation (which predominantly relate to visual amenity) and which are enhancements (which predominantly relate to the landscape resource).However, as noted above the creation of wildflower meadows and wildflower margins are considered to be enhancement measures which go beyond mitigation measures. Mitigation of the solar infrastructure can be achieved through hedgerow planting to the boundaries of fields containing panels. The Applicant has maintained the fields on the edge of the CNL (where panels have been removed to avoid harm to the CNL) within the Scheme in order to provide positive enhancement. The applicant considers the avoidance measures embedded within the Scheme successfully reduces the visual impact of the Scheme on the CNL and its setting and subsequently provides opportunities for positive enhancement through the conversion of arable land to wildflower grassland (which does not provide any visual mitigation of the solar scheme) and is in line with the Nature Recovery Strategy. The Applicant would like to reiterate that **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]** does not identify beneficial effects to Landscape Character as a result of the implementation of the landscape scheme during the construction period or operational lifetime of the Scheme, only to Landscape Fabric. The landscape proposals are substantial, and the beneficial effects associated with

				these to landscape fabric are set out within the LVIA, with these beneficial effects only associated with the tangible gains provided to landscape fabric. It is fully acknowledged that the character of the Site itself, and its immediate surroundings would be Significantly Adversely affected, with the land now presenting as a large-scale solar scheme. However, the avoidance measures along the boundary of the CNL limit the extent of the visual effect of the Scheme on the CNL's character and scenic qualities. At the point the Scheme is decommissioned the landscape proposals would provide the long-term legacy landscape benefits as set out within **ES Volume 1, Chapter 8: Landscape and Visual [APP-060].**
CNL-066	Landscape and Visual	Enhancements	Notwithstanding the proposed mitigation and enhancement measures, the Board notes that Section 2.4 of Appendix 8-6 identifies that the proposal may give rise to several significant adverse landscape and visual effects relating to the CNL and its setting, including:	The Applicant notes this comment and has responded to each point below. All identified significant adverse landscape and visual effects relating to the CNL and its setting are temporary in nature and relate to the construction and Year 1 effects as shown in Table 9: Landscape Effects and Table 10-12: Visual Effects of **ES Volume 3, Appendix 8-6 Assessment of Effects on the Cotswolds National Landscape and its Special Qualities [APP-197]**.

CNL-067	Landscape and Visual	Adverse Landscape and Visual Impacts	Major/moderate adverse effect for receptors at viewpoint 18 at construction and Year 1	Receptor TP037: Users of Footpath WT|NORT|1, represented by VP 18, are assessed as having Major / Moderate Adverse Significant Effects at construction and Year 1. As noted at paragraph 2.4.14 of **ES Volume 3, Appendix 8-6 Assessment of Effects on the Cotswolds National Landscape and its Special Qualities [APP-197]**, this footpath connects from Foxley Road on the edge of the CNL to Honey Lane to the southwest. Although not in the CNL itself, there is a visual relationship between the footpath and the CNL at its northern end. Although the assessment identifies Major/Moderate Adverse effects on the footpath during Construction, these effects are as a result of the development on the southwestern end of the Footpath, close to Honey Lane (which are approximately 1km from the boundary of the CNL and are not considered to be within the setting of the CNL) There is no infrastructure proposed in B12 which is within the setting of the CNL and there would be no change in views to and from the CNL from the footpath at its northern end. The full assessment on this Receptor is set out in **ES Volume 3, Appendix 8-3-2-2: Landscape and Visual Assessment Sheets (Significant) [APP-191].**

CNL-068	Landscape and Visual	Adverse Landscape and Visual Impacts	Moderate adverse effect for receptors at TR038 at construction and Year 1	Receptor TR038: Users of Alderton Road, Luckington represented by VP 25 and CNLG are assessed as having Moderate Adverse Significant Effects at construction and Year 1. As noted at paragraph 2.4.19 of **ES Volume 3, Appendix 8-6 Assessment of Effects on the Cotswolds National Landscape and its Special Qualities [APP-197]**, construction effects would be temporary in nature and at the start of the operation phase infrastructure would be visible to varying degrees and at varying distance from the road as mitigation planting would have a limited effect initially. However, once mitigation planting matures the magnitude of change would reduce to Very Low and the effects at Year 15 would reduce to Minor and Neutral in nature, with no adverse effects identified during decommissioning. Although it is recognised that these temporary effects are within the setting of the CNL, there would be no significant long-term effects on views from Alderton Road and the CNL. The Full assessment on this Receptor is set out in **ES Volume 3, Appendix 8-3-2-2: Landscape and Visual Assessment Sheets (Significant) [APP-191].**
CNL-069	Landscape and Visual	Adverse Landscape and Visual Impacts	Moderate adverse effect for receptors at TR043 at construction and Year 1	Receptor TR043: Users of Ford Road and Widleys Road Junction East C93 to Bottom of Bustlers Hill, Sherston represented by VP 6 are assessed as having Moderate Adverse Significant Effects at construction and Year 1. As noted at paragraph 2.4.19 of **ES Volume**

				3, Appendix 8-6 Assessment of Effects on the Cotswolds National Landscape and its Special Qualities [APP-197], construction effects would be temporary in nature and at the start of the operation phase infrastructure would be visible to varying degrees as mitigation planting would have a limited effect initially. However, once mitigation planting matures the magnitude of change would reduce to Very Low and the effects at Year 15 would reduce to Minor and Neutral in nature, with no adverse effects identified during decommissioning. Although it is recognised that these temporary effects are within the setting of the CNL, there would be no significant long-term effects on users of Ford Road and Widleys Road and the CNL. The Full assessment on this Receptor is set out in **ES Volume 3, Appendix 8-3-2-2: Landscape and Visual Assessment Sheets (Significant) [APP-191].**

CNL-070	Landscape and Visual	Adverse Landscape and Visual Impacts	Moderate adverse effect for receptors at TR143 at construction and Year 1	Receptor TR143; Users of Commonwood Lane, represented by VP 9, are assessed as having Moderate Adverse Significant Effects at construction and Year 1. As noted at paragraph 2.4.19 of **ES Volume 3, Appendix 8-6 Assessment of Effects on the Cotswolds National Landscape and its Special Qualities [APP-197]** construction effects would be temporary in nature and at the start of the operation phase infrastructure would be visible to varying degrees as mitigation planting would have a limited effect initially. However, once mitigation planting matures the magnitude of change would reduce to Very Low and the effects at Year 15 would reduce to Minor and Neutral in nature, with no effects identified during decommissioning. Common Wood Lane is not within the CNL itself. However, there is some limited intervisibility between the CNL on rising land to the west of Commonwood Lane which strictly means it is within the CNL's setting. However, the temporary Moderate Adverse effects identified are to the east of the Lane and are not seen in combination with the CNL. There would be no significant long-term effects on the CNL. The Full assessment on this Receptor is set out in **ES Volume 3, Appendix 8-3-2-2: Landscape and Visual Assessment Sheets (Significant) [APP-191].**

CNL-071	Landscape and Visual	Adverse Landscape and Visual Impacts	Moderate adverse effect for receptors at TR145 at construction and Year 1	There are no effects on Receptor TR145:users of the Fosse Way within the CNL.TR145 represents a long section of the Fosse Way from Dunley Wood to the south to Foxley Road to the North as represented by Viewpoints 14,15 and 22 – 25. Users of the Fosse Way are assessed as having Moderate Adverse Significant Effects at construction and Year 1. As noted at paragraph 2.4.19 of **ES Volume 3, Appendix 8-6 Assessment of Effects on the Cotswolds National Landscape and its Special Qualities [APP-197]** construction effects would be temporary in nature and at the start of the operation phase infrastructure would be visible to varying degrees as mitigation planting would have a limited effect initially. However, once mitigation planting matures the magnitude of change would reduce to Very Low and the effects at Year 15 would reduce to Minor and Neutral in nature, with no adverse effects identified during decommissioning. It is recognised that some of these temporary effects are within the setting of the CNL at its southern and northern ends. However, here would be no significant long-term effects on the CNL or its setting.

CNL-072	Landscape and Visual	Adverse Landscape and Visual Impacts	Moderate adverse effect for receptors at TR154 at construction and Year 1	Receptor TR154: Users of Road Junction at Southfields South East to Y Junction, Sherston Lane provides an approach road to Sherston joining the CNL at its northern end. The receptor is assessed as having Moderate Adverse Significant Effects at construction and Year 1. As noted at paragraph 2.4.19 of **ES Volume 3, Appendix 8-6 Assessment of Effects on the Cotswolds National Landscape and its Special Qualities [APP-197]** construction effects would be temporary in nature and at the start of the operation phase infrastructure would be visible to varying degrees as mitigation planting would have a limited effect initially. However, once mitigation planting matures the magnitude of change would reduce to Very Low and the effects at Year 15 would reduce to Minor and Neutral in nature, with no adverse effects identified during decommissioning. It is recognised that some of these temporary effects are within the setting of the CNL at its northern end. However, there would be no significant long-term effects on the CNL or its setting.

CNL-073	Landscape and Visual	Adverse Landscape and Visual Impacts	Moderate adverse effect upon landscape character within the 1 km local study area	Moderate Adverse (Significant) Effects were recorded within the 1km Study Area of Sites A, B, and C during Construction Operation Year 1 which includes part of the CNL. These effects are fundamentally due to the change in land use from agricultural land to solar infrastructure. However, there are no direct landscape changes within the CNL. The Landscape effects on the CNL are set out in Paragraph 2.4. of **Appendix 8-6 Assessment of Effects on the Cotswolds National Landscape and its Special Qualities [APP-197]**. It notes there is no physical overlap between the Scheme and the CNL and consequently the Scheme causes no direct impacts on the CNL. In relation to the landscape effects of the Scheme on the setting of the CNL, the assessment focuses principally on the how the character is perceived with reference to Local Landscape Character Areas (LLCA) that would potentially be indirectly impacted upon by the Scheme. Accordingly, these are principally affected due to intervisibility with the Scheme and the visual effects on sensitive receptors. It should be noted that the Local Study Area does not correspond to the area of visual influence of the Scheme within the CNL. As such, the visual effects of receptors with views to and from the CNL are used to inform the effects on the setting of the CNL in landscape terms. Those visual receptors which are principally affected due to intervisibility within the Scheme are described in Paragraphs 2.4.12- 2.4.19 of

				Appendix 8-6 Assessment of Effects on the Cotswolds National Landscape and its Special Qualities [APP-197] and are discussed above.
CNL-074	Landscape and Visual	Enhancements	Therefore, the Board recommends that the DCO Examination should further consider whether the proposal would give rise to significant adverse environmental effects upon the Cotswolds National Landscape (CNL) designation, its setting and its special qualities and whether the proposal seeks to further the purposes of National Landscape designation. The Board will provide further assessment and recommendations on this matter at the Examination stage including recommendations regarding appropriate mitigation, enhancement, and if necessary, compensation measures.	The Applicant notes this comment and confirms there no long-term landscape and visual effects on the CNL and its special qualities. The standalone assessment of effects on the CNL and its Special Qualities in **Appendix 8-6 Assessment of Effects on the Cotswolds National Landscape and its Special Qualities [APP-197]**. has found that there are no significant direct effects on the CNL or its Special Qualities. Harm to the CNL itself would be minimal due to the avoidance measure. Beneficial landscape effects within the setting of the CNL provided by the embedded enhancement measures are both appropriate and would be secured as part of the Scheme and would

				discharge the duty to further the purposes of the CNL.
CNL-075	Landscape and Visual	Landscape and Visual Impacts (PMIEs 2, 3, 5 and 6)	Landscape and Visual Impacts (PMIEs 2, 3, 5 and 6) PMIE 2: We support the applicant's decision to remove Solar PV Panels from Fields A11, A12, C2, C3 and C4 to avoid significant adverse landscape and visual effects on the CNL and its setting. We also support the proposal that Fields A11 and A12 on the boundary of the CNL will provide habitat enhancement to further the purpose of the CNL designation. We note that Fields C2, C3 and C4 have been removed from the Order Limits of the Scheme and will not be used for habitat enhancement. Therefore, we consider that this PMIE is resolved.	The Applicant notes this comment.

CNL-076	Landscape and Visual	Landscape and Visual Impacts (PMIEs 2, 3, 5 and 6)	PMIE 3: We support the decision to remove Solar PV Panels in the remainder of Field C6 and its retention for habitat mitigation and enhancement. We note that the visibility of Solar PV Panels in Field C7 from publicly accessible viewpoints within the CNL has been tested through the production of a series of sections to illustrate the degree of potential visibility of Solar PV Panels from agreed locations (coordinated with the locations of the previously agreed Viewpoints and one additional) within the CNL. These sections demonstrate that the potential visibility of panels would be extremely limited at worst. We note that Field C9 remains unchanged from the design shown at statutory consultation, and the remainder of it will still include Solar PV Panels. This matter is specifically considered in relation to PMIE 6, otherwise we consider that this PMIE is resolved.	The Applicant notes this comment. The Applicant agrees that PMIE 3 is resolved, and that the remaining concerns about the inclusion of panels in C9 are covered by PMIE 6.
CNL-077	Landscape and Visual	Landscape and Visual Impacts (PMIEs 2, 3, 5 and 6)	PMIE 5: We note that Fields C2, C3 and C4 have been removed from the Scheme and therefore consider that this PMIE is resolved.	The Applicant notes this comment.
CNL-078	Landscape and Visual	Landscape and Visual Impacts (PMIEs 2, 3, 5 and 6)	PMIE 6: This PMIE concerns potential significant adverse visual effects for receptors located on Alderton Road (viewpoint reference number VP CNL G). We support the removal of panels in the remainder of Field C6 and its retention for habitat mitigation and enhancement. Based on the photography and visualisations provided, we agree with the	The Applicant notes this comment.

			applicant's assessment that there would be a moderate adverse (significant) effect during construction and at year 1 for receptors (principally motorists and cyclists) travelling along this road which marks the CNL's boundary, though this would reduce to minor adverse by year 15 with the maturation of mitigation measures.	
CNL-079	Landscape and Visual	Outline Landscape and Ecological Management Plan (OLEMP, Examination Document APP-283, PMIE 7)	Outline Landscape and Ecological Management Plan (OLEMP, Examination Document APP-283, PMIE 7) The Outline Landscape and Ecological Management Plan (OLEMP, Examination Document APP-283) secures the delivery of the Scheme's landscape and ecological mitigation and enhancement features. It sets out the framework for creation/planting/seeding of new habitats, as well as the management of all retained and proposed habitats and ecological/landscape features. It includes an outline ecological monitoring strategy designed to assess the establishment and development of new/retained habitats and use of the operational Scheme by target species.	The Applicant notes this comment.
CNL-080	Landscape and Visual	Outline Landscape and Ecological Management Plan (OLEMP, Examination Document APP-283, PMIE 7)	The comments below are based on the understanding that a detailed version of the LEMP ('Final LEMP') will be produced prior to the commencement of construction and will be secured through the DCO, should the DCO be granted. The Final LEMP will need to be approved by the local planning authority and will be substantially in accordance with the Outline LEMP.	The measures set out within the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]** are secured by Requirement 7 of the **Draft Development Consent Order (DCO) [APP-016]** which requires a detailed LEMP to be produced post consent. The detailed LEMP must be substantially in accordance with the **Outline LEMP [APP-283]** and be implemented as approved, as secured by

				Requirement 7 of the **Draft DCO [APP-016]**.
CNL-081	Landscape and Visual	Outline Landscape and Ecological Management Plan (OLEMP, Examination Document APP-283, PMIE 7)	Whilst we generally support the aims, scope and content of the OLEMP and acknowledging that the site is located within the CNL's setting, we have the following comments and observations relating to the OLEMP for consideration by both the applicant and Examining Authority (numbers refer to paragraph numbers within the OLEMP):	The Applicant notes this comment.
CNL-082	Landscape and Visual	OLEMP Paragraph Reference	1.2.2 to 1.2.5.: Whilst it is acknowledged that the site is not within the CNL, it does lie within its setting and therefore we recommend mention is given to the CNL Management Plan and associated guidance, including the Landscape, Strategy and Guidelines and Nature Recovery Plan referred to above.	The Applicant notes this comment. These key CNL publications have been used to inform the landscape led scheme and approach to mitigation and would continue to be used to guide the Final LEMP.

CNL-083	Landscape and Visual	OLEMP Paragraph Reference	1.2.7: The Wiltshire LNRS has now been published so is no longer draft.	The Applicant notes this comment. The Wiltshire LNRS was still in draft at the time of preparation of the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]** and was consulted in the preparation of this document. It is noted the published LNRS does not considerably differ from the draft version and no changes to the measures set out within the **OLEMP [APP-283]** are considered necessary as a result of the final LNRS having been published. The detailed Landscape and Ecological Management Plan, which will need to substantially in accordance with the **OLEMP [APP-283]** secured through Requirement 7 in Schedule 2 of the **Draft Development Consent Order [APP-016]**, will consider the published and most-up-to LNRS during its preparation.
CNL-084	Landscape and Visual	OLEMP Paragraph Reference	1.3.9: Specialist drills for wildflower seed are available but need graded wildflower seed. For mixed and brush harvested seed, broadcasting is really the only option.	The Applicant notes this comment and will consider this during the preparation of the detailed Landscape and Ecological Management Plan, which will need to substantially in accordance with the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]** secured through Requirement 7 in Schedule 2 of the **Draft Development Consent Order [APP-016]**. The Applicant welcomes the opportunity to prepare the detailed Landscape and Ecological Management Plan in consultation with CNL.
CNL-085	Landscape and Visual	OLEMP Paragraph Reference	1.3.13 : Biodegradable tree guards are still a developing area. There may be a product available when planting starts after consent, but plastic tubes may still	The Applicant notes this comment and will consider the use of biodegradable tree guards during the preparation of the detailed Landscape and Ecological

			be the only practical solution in many instances. The paragraph goes on to say that the guards will be removed within five years – no need if biodegradable tubes are used.	Management Plan, which will need to substantially in accordance with the **OLEMP [APP-283]** secured through Requirement 7 in Schedule 2 of the **Draft Development Consent Order [APP-016]**. The Applicant welcomes the opportunity to prepare the detailed Landscape and Ecological Management Plan in consultation with CNL.
CNL-086	Landscape and Visual	OLEMP Paragraph Reference	1.3.14.: To increase resilience to climate change, southern provenance/origin stock should be included. We recommend: Provenance Woodland creation and restocking after felling should comprise ⅓ of trees from selected seed sources from the same Region of Provenance as the site to be planted (403 and 404 for the Cotswolds), ⅓ from the region to the south (404 and 305) and ⅓ from northern France to increase resilience to climate change as recommended by the Forestry Commission. Importing tree stock or seed should follow current biosecurity measures (Redacted). It is recommended that discussions with a nursery take place now so that they can provide southern provenance/origin stock for when work starts. It takes 2-3+ years to grow stock ready for planting 1.3.23: Same as for 1.3.14 above.	The Applicant notes this comment and will consider this during the preparation of the detailed Landscape and Ecological Management Plan, which will need to substantially in accordance with the **Outline Landscape and Ecological Management Plan [APP-283]** secured through Requirement 7 in Schedule 2 of the **Draft Development Consent Order [APP-016]**. The Applicant welcomes the opportunity to prepare the detailed Landscape and Ecological Management Plan in consultation with CNL.
CNL-087	Landscape and Visual	OLEMP Paragraph Reference	1.3.26-27: We fully support reflecting the species mix already present in local hedgerows. The planting of blackthorn is noted but suitable management needs to be in place to control spread by suckering. Within Table 1: hedgerow species there is no indication of percentage of each species within the	The Applicant notes this comment and the percentage mix of each hedgerow species will be specified during the preparation of the detailed Landscape and Ecological Management Plan, which will need to substantially in accordance with the **Outline Landscape and Ecological Management Plan [APP-**

			mix. The percentage of each species in the mix also needs to take account of future management.	**283]** secured through Requirement 7 in Schedule 2 of the **Draft Development Consent Order [APP-016]**.
CNL-088	Landscape and Visual	OLEMP Paragraph Reference	1.3.35: It is important that hedgerow trees are not regularly spaced. The spacing of 20m (on average) is very dense for the open landscape character. It is reasonable to increase canopy cover, but it should still take account of landscape character.	The Applicant notes this comment and will consider this during the preparation of the detailed Landscape and Ecological Management Plan, which will need to substantially in accordance with the **Outline Landscape and Ecological Management Plan [APP-283]** secured through Requirement 7 in Schedule 2 of the **Draft Development Consent Order [APP-016]**.
CNL-089	Landscape and Visual	OLEMP Paragraph Reference	1.3.36-43: 5-9m centres for hedgerow tree planting is far too dense for these landscapes. The exception will be where screening is potentially required. Consideration needs to be given to the legacy of tree planting once the panels are removed. The logic of planting a group or line of trees to screen a building or view of the panels from a road or public right of way could be lost once the building or panels have been removed, leaving something that could be out of character. We recommend that the applicant should create images of what the legacy landscape would look like compared to the current landscape from key viewpoints to illustrate how the long term legacy landscape will be changed.	The Applicant notes this comment and will consider this during the preparation of the detailed Landscape and Ecological Management Plan, which would be substantially in accordance with the **Outline Landscape and Ecological Management Plan [APP-283]** secured through Requirement 7 in Schedule 2 of the **Draft Development Consent Order [APP-016]**. Consideration of the legacy landscape (the landscape left following decommissioning of the Scheme) has formed part of the landscape led approach to the Scheme. In order to make long term improvements to the landscape which are appropriate to its character, mitigation measures not

				appropriate to landscape character have been resisted. This includes not planting screening either side of PRoW which typically diagonally cross fields, as it would leave a scar on the legacy landscape. It should also be noted that following decommissioning when the land would be returned to the landowner there would be nothing to stop farmers from reducing the height of hedgerow. The Applicant agrees to prepare visualisations at year 60, post decommissioning, to show the effect of the legacy landscape. Further consultation with CNL will take place regarding the viewpoints for this exercise. The Applicant would also like to note that beyond the point of decommissioning, land management would no longer sit within the Applicant's control or within the scope of the Development Consent Order.
CNL-090	Landscape and Visual	OLEMP Paragraph Reference	Table 2: Hedgerow tree species: We recommend consideration being given to the inclusion of disease tolerant elm. It is very likely that elm was present in the landscape. It would also increase the number of large canopy tree species beyond just oak. Field maple, hawthorn and crab apple are small-medium trees when mature. Cherry is a large tree species but comparatively short lived. Small and large leaved lime are also worth considering.	The Applicant notes this comment and will consider this during the preparation of the detailed Landscape and Ecological Management Plan, which will need to substantially in accordance with the **Outline Landscape and Ecological Management Plan [APP-283]** secured through Requirement 7 in Schedule 2 of the **Draft Development Consent Order [APP-016]**.

CNL-091	Landscape and Visual	OLEMP Paragraph Reference	1.3.47: Shelterbelts should be avoided in these open landscape types.	The Applicant notes this comment. Shelterbelts are proposed in a few locations to link or extend existing woodlands and increase ecological connectivity. An example of this is to the northeast of the B9. Refer to **ES Volume 2, Figure 3-4-1** to **3-4-5.2: Landscape and Ecology Mitigation Plans [APP-084].** The Applicant will consider this during the preparation of the detailed Landscape and Ecological Management Plan, which will need to substantially in accordance with the **Outline Landscape and Ecological Management Plan [APP-283]** secured through Requirement 7 in Schedule 2 of the **Draft Development Consent Order [APP-016].**
CNL-092	Landscape and Visual	OLEMP Paragraph Reference	Table 3 Woodland trees species: The OLEMP should specify if the black poplar is hybrid or native.	The Applicant notes this comment and will consider this during the preparation of the detailed Landscape and Ecological Management Plan, which will need to substantially in accordance with the **Outline Landscape and Ecological Management Plan [APP-283]** secured through Requirement 7 in Schedule 2 of the **Draft Development Consent Order [APP-016].**
CNL-093	Landscape and Visual	OLEMP Paragraph Reference	Table 4 Tree species: For riparian planting native black poplar should be considered, particularly for bankside planting. Hybrid poplar should be removed from the list. There is a good opportunity to reinstate this rare native tree to the landscape using genetically tested stock. Willows are notably absent from the list.	The Applicant notes this comment and will consider this during the preparation of the detailed Landscape and Ecological Management Plan, which will need to substantially in accordance with the **Outline Landscape and Ecological Management Plan [APP-283]** secured through Requirement 7 in Schedule 2 of the **Draft Development Consent Order [APP-016].**

CNL-094	Landscape and Visual	OLEMP Paragraph Reference	1.3.82: Green hay and brush harvested seed. Brush harvested seed does entail more work on the donor site but is significantly less bulky to transport than green hay. Both techniques should be included.	The Applicant notes this comment and will consider both the use of green hay and brush harvested seed during the preparation of the detailed Landscape and Ecological Management Plan, which will need to substantially in accordance with the **Outline Landscape and Ecological Management Plan [APP-283]** secured through Requirement 7 in Schedule 2 of the **Draft Development Consent Order [APP-016]**.
CNL-095	Landscape and Visual	OLEMP Paragraph Reference	1.3.96: It is recommended that more flexibility is built into the description of grassland management. 1.3.96 describes the 'ideal' but much of the farmland is arable with a legacy of fertiliser. The reality is that for the first 2-3 years, grass growth will significantly dominate the sward and more regular mowing and removal of arisings or more intense grazing will be required. Depending on the results of soil testing, a more practical approach may be to drill with grasses, intensively manage for 2-3 years and then over-sow with wildflower seed once the nutrient levels have decreased.	The Applicant notes this comment and will consider this during the preparation of the detailed Landscape and Ecological Management Plan, which will need to substantially in accordance with the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]** secured through Requirement 7 in Schedule 2 of the **Draft Development Consent Order [APP-016].** As set out in the OLEMP, testing of soil conditions prior to seeding to provide baseline information has been prescribed. The OLEMP further sets out a monitoring strategy which includes habitat surveys, botanical quadrats and soil testing to monitor the establishment and development of habitats. It is noted within the OLEMP that such monitoring will be carried out more frequently in the first five years so that remediation measures or changes in management can be applied in the early stages of habitat development.
CNL-096	Landscape and Visual	OLEMP Paragraph Reference	1.3.99: It will take several years before a new wildflower rich grassland is suitable for use as a donor site.	The Applicant notes this comment.

CNL-097	Landscape and Visual	OLEMP Paragraph Reference	1.3.122: Restoration of historic ponds should be the priority.	The Applicant notes this comment and confirms that restoration of historic or 'ghost' ponds, as identified through historic mapping, was a priority throughout the design of the Scheme. As described in paragraph 9.10.133 of **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**, nine of the ten indicative locations for pond creation shown in **ES Volume 2, Figure 3-4: Landscape and Ecological Mitigation Plan [APP-084]** are located at historic farm ponds which have been in-filled in the past.
CNL-098	Landscape and Visual	Outline Ecological Protection and Mitigation Strategy (OEMPS, Examination Document APP-284, PMIE 7)	Outline Ecological Protection and Mitigation Strategy (OEMPS, Examination Document APP-284, PMIE 7) The Outline Ecological Protection and Mitigation Strategy (OEPMS) sets out the ecological protection measures for undertaking construction works associated with the proposal. It specifically deals with the protection of habitats and species during the construction phase, to include the construction of the Solar Photovoltaic (PV) Panels (and associated access tracks and substations), Battery Energy Storage System (BESS) and installation of cabling within the Cable Route Corridor.	The Applicant notes this comment

CNL-099	Landscape and Visual	Outline Ecological Protection and Mitigation Strategy (OEMPS, Examination Document APP-284, PMIE 7)	As with the OLEMP, it is understood that a final version, which will be more detailed but substantially in accordance with the measures and principles set out within this document, will be submitted to and approved by the relevant planning authorities pursuant to a requirement in the DCO prior to the construction of the scheme	The preparation, approval and implementation of the detailed Ecological Protection and Mitigation Strategy, substantially in accordance with the **OEPMS [APP-284]**, is secured through Requirement 8 in Schedule 2 of **the Draft Development Consent Order [APP-016].**
CNL-100	Landscape and Visual	Outline Ecological Protection and Mitigation Strategy (OEMPS, Examination Document APP-284, PMIE 7)	We note that the OEPMS has a section on bats, but bats are not mentioned in the OLEMP. Impacts, mitigations and enhancements for bats should be fully considered and provided for within both documents.	The Applicant notes this comment. The proposals for habitat creation, enhancement and management set out within the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]** will be expected to increase the value of habitats for foraging and commuting bats, particularly in comparison to the arable fields which currently comprise the majority of the land within the Scheme. Furthermore, paragraphs 1.3.150 and 1.3.151 of the **OLEMP [APP-283]** prescribe the installation of new bat roosting features as part of the Scheme, designed to increase roosting opportunities for a range of bat species.
CNL-101	Landscape and Visual	Outline Ecological Protection and Mitigation Strategy (OEMPS, Examination Document APP-284, PMIE 7)	Temporary lighting is to be used for construction in exceptional circumstances and very likely for construction compounds, particularly for site offices and stores.	As set out in the **Outline Construction Environmental Management Plan (CEMP) [APP-277**] the use of lighting would be minimised to that required for safe site operations; • Lighting would utilise directional fittings to minimise outward light

				spill and glare (e.g. via the use of light hoods/cowls which direct light below the horizontal plane, preferably at an angle greater than 20° from horizontal); • Lighting would be directed towards the middle of the Order limits rather than towards the boundaries. There would be no direct effects on the CNL itself. Any effects would be temporary in nature and confined to the construction phase and would have a Very Low magnitude of change. From the outset, the dark-sky-compliant lighting strategy would be fully implemented. Lighting is not required within the Solar PV Sites during the operation and maintenance phase of the Scheme. All routine maintenance activities would be scheduled for daylight hours as far as is practicable. Focussed task specific lighting would only be required in the event of emergency works or equipment failure requiring night-time working.
CNL-102	Landscape and Visual	Outline Ecological Protection and Mitigation Strategy (OEMPS, Examination Document APP-284, PMIE 7)	Paragraph 198c of the NPPF states that planning decisions should ensure that new development is appropriate for its location and in doing so they should limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.	The effects of lighting on the CNL Special Quality 10 - Dark skies has been assessed in **ES Volume 3, Appendix 8-6 Assessment of Effects on the Cotswolds National Landscape and its Special Qualities [APP-197]**. The assessment concluded there would be no direct effects on the CNL itself. Any effects would be temporary in nature and confined to the construction phase and would have a Very Low magnitude of change.

				From the outset, the dark-sky-compliant lighting strategy would be fully implemented. Lighting is not required within the Solar PV Sites during the operation and maintenance phase of the Scheme. All routine maintenance activities would be scheduled for daylight hours as far as is practicable. Focussed task specific lighting would only be required in the event of emergency works or equipment failure requiring night-time working. Motion sensing security lighting would be provided within substations and within the BESS Area to maintain safe working conditions in winter months, for security purposes, and for maintenance activities. The lighting commitments for the operation and maintenance phase are set out in the **Outline Operational Environmental Management Plan (OEMP) [APP-278]**, including details on lighting design to minimise light spill. These brief activations would be imperceptible from the CNL due to distance and directional shielding. Magnitude at Year 1 is assessed as Very Low.

CNL-103	Landscape and Visual	Outline Ecological Protection and Mitigation Strategy (OEMPS, Examination Document APP-284, PMIE 7)	Paragraph 001 of the PPG on Light Pollution (Paragraph: 001 Reference ID: 31-001-20191101) states that “intrinsically dark landscapes’ are those entirely, or largely, uninterrupted by artificial light. National parks … can serve as good examples”.	The Applicant notes this comment.
CNL-104	Landscape and Visual	Outline Ecological Protection and Mitigation Strategy (OEMPS, Examination Document APP-284, PMIE 7)	As National Landscapes have the same level of protection with regards to landscape and scenic beauty as national parks within the NPPF and PPG and dark skies are one of the special qualities of the Cotswolds National Landscape, we consider it reasonable to treat the National Landscape as an ‘intrinsically dark landscape’ in NPPF and PPG terms. Policy CE6 of the National Landscape Management Plan states that proposals that have the potential to impact on the dark skies of the CNL should be delivered in a way that is compatible with and seek to further the conservation and enhancement of these dark skies, by seeking to avoid and where avoiding is not possible, minimise lighting.	The Applicant notes this comment and refers to the comments above about dark skies.

CNL-105	Landscape and Visual	Outline Ecological Protection and Mitigation Strategy (OEMPS, Examination Document APP-284, PMIE 7)	There may instances where temporary lighting will be required within the setting of the CNL, but it should be dark sky compliant i.e. where it's needed and when it's needed and avoiding any upward lighting and light spill. Any lighting should be compliant with the requirements of with Guidance Note 01/21 on The Reduction of Obtrusive Light, published by the Institution of Lighting Professionals (ILP) (which forms Appendix 2 of the Board's Position Statement on Dark Skies and Artificial Light, referenced above).	The only part of the Scheme within the CNL relates to temporary construction routes which would not require lighting. However, it can be confirmed that any lighting within the setting of the CNL would be compliant with the requirements of with Guidance Note 01/21 on The Reduction of Obtrusive Light, published by the Institution of Lighting Professionals (ILP) (which forms Appendix 2 of the Board's Position Statement on Dark Skies and Artificial Light.
CNL-106	Landscape and Visual	Outline Ecological Protection and Mitigation Strategy (OEMPS, Examination Document APP-284, PMIE 7)	We would recommend that the relevant 'environmental zone' for which compliance should be assessed is Environmental Zone E1 which relates to National Landscapes to mitigate any adverse impact and ensure that all lighting meets the standards to preserve the dark skies and landscape character of the Cotswolds National Landscape. Although we recognise that the site is within the setting of the National Landscape, the Guidance Note states where an area to be lit lies close to the boundary of two zones the obtrusive light limitation values used should be those applicable to the most rigorous zone (Note 1 on page 10).	The Applicant notes this comment. Lighting is not required within the Solar Arrays for the operational phase. Motion sensing security lighting will be provided within substations and within the BESS to be used only for maintenance and security purposes. Temporary site lighting during construction will be required to enable safe working during construction and decommissioning during hours of darkness and will be designed as far as reasonably practicable to minimise potential for light spillage outside the Scheme and Cable Corridor, particularly towards houses, traffic and ecological habitats. Standard good practice measures would be employed to minimise light spill, including glare during construction, operation and decommissioning. Although not specifically referenced in the **Outline Ecological Mitigation Strategy [APP-284]**, the applicant confirms that the

				Scheme has been assessed against this standard to protect SQ 10: Extensive dark sky areas within the CNL.
CNL-107	Landscape and Visual Transport and Access	Impacts upon the Tranquillity of the CNL (PMIE 4)	Transport & Access – impacts upon the tranquillity of the CNL (PMIE 4) PMIE 4 outlined above relates to construction traffic movements through the CNL and their potential impact on the tranquillity of the CNL as well as landscape and visual impacts	The Applicant notes this comment.
CNL-108	Landscape and Visual Transport and Access	Impacts upon the Tranquillity of the CNL (PMIE 4)	Our previous recommendation outlined within the PMIE was that construction traffic should be routed outside of the CNL to avoid significant adverse impacts upon its Tranquillity and landscape and scenic beauty.	The potential effects of construction traffic on the local highway network are assessed in **ES Volume 1, Chapter 13: Transport and Access [APP-065]**, which considers construction vehicle movements, traffic volumes, road safety and effects on road users. In the assessment of transport impacts we assign a receptor to the nearest highway link and identify the sensitivity of receptors based on the relationship with the highway environment in line with **paragraph 1.31 IEMA transport and access guidelines**. The relationship to the highway environment is determined on the following transport factors: • Severance of communities

				• Road vehicle driver and passenger delay • Non-motorised user delay • Non-motorised amenity • Fear and intimidation on and by road users • Road user and pedestrian safety • Hazardous/large loads Our construction route selection was primarily decided taking these factors into account, whilst selecting the most suitable and direct routes from the strategic road network to the proposed site location. The majority of trips and deliveries to site will come from the strategic road network. In this case, we identified two main routes to serve the sites, M4 junction 18 serves Lime Down solar A, B and C to the west and M4 Junction 17 serving D and E to the east. The two routes help to spilt traffic flows between these parcels reducing traffic impacts and avoids using unsuitable roads between the east and west of the scheme. **ES Volume 2, Figure 13-1 Study Area: Solar PV Sites [APP-146]** illustrates the proposed construction routes. In regard to the CNL, we assigned the CNL receptor as medium sensitivity when it is related to the highway environment. Wiltshire County Council agreed to this

				assignation in paragraph 20 of their Relevant Representation. The location of Lime Down A B and C in the west of the scheme are adjacent to the CNL and the selected construction route to these sites from M4 jct 18 travel through the CNL. Only two possible alternative routes exist to these sites that avoid the CNL and they are via Farleaze and via Norton, both unsuitable as they include single track narrow road for long sections with limited visibility and were therefore ruled out. **ES Volume 1, Chapter 13: Transport and Access [APP-065]** concludes that the effects on the construction route links within the CNL are negligible to minor and the transport impacts of the scheme will be temporary and managed by mitigation measures set out in the **Outline Construction Traffic Management Plan (CTMP) [APP-287]**. These mitigation measures include restrictions on delivery times and a booking system to limit the potential for construction vehicles meeting on minor roads.
CNL-109	Landscape and Visual Transport and Access	Impacts upon the Tranquillity of the CNL (PMIE 4)	Following a meeting with Board Officers in November 2025, the Applicant has sent the Board a Technical Note relating to the effects of the proposed scheme on the tranquillity of the CNL. As this Technical Note has not yet been submitted to the Planning Inspectorate as an Additional Submission and therefore is not in front of	The Applicant will submit the Technical Note on Tranquillity at Deadline A.

			the Examining Authority or other parties for comment as part of this consultation, the Board has not considered the content of the Technical Note within these Relevant Representations and will consider it in due course during the Examination, should it be submitted.	
CNL-110	Landscape and Visual Transport and Access	Impacts upon the Tranquillity of the CNL (PMIE 4)	Tranquillity is one of the 'special qualities' of the Cotswolds National Landscape, being one of the features of the Cotswolds that makes the area so outstanding that it is in the nation's interest to safeguard it. The Cotswolds National Landscape has relatively high levels of tranquillity, especially when compared with the surrounding urban areas, though we acknowledge that both the relative tranquillity and dark skies of the National Landscape are affected by the noise and artificial lighting of the neighbouring built environment.	The Applicant notes this comment. See the above response with regard to transport and tranquillity.
CNL-111	Landscape and Visual Transport and Access	Impacts upon the Tranquillity of the CNL (PMIE 4)	Policy CE5 of the CNL Management Plan states that proposals that have the potential to impact on the tranquillity of the CNL should be delivered in a way that is compatible with and seek to further the conservation and enhancement of this tranquillity, by seeking to avoid and where avoiding is not possible, minimise noise and other aural and visual disturbance. Proposals that have the potential to impact on the tranquillity of the CNL should have regard to – and be compatible with – the CNL Board's Tranquillity Position Statement.	The Applicant notes this comment. The transport impacts of the scheme will be temporary and managed by mitigation measures set out in the **Outline Construction Traffic Management Plan [APP-287]**. These mitigation measures include restrictions on delivery times and a booking system to limit the potential for construction vehicles meeting on minor roads.

CNL-112	Landscape and Visual Transport and Access	Impacts upon the Tranquillity of the CNL (PMIE 4)	Section 4.5 of the Board's Tranquillity Position Statement referenced above outlines how The Institute of Environmental Assessment's 'Guidelines for the Environmental Assessment of Road Traffic' recommends using two 'rules of thumb' for identifying the scale at which increases in traffic movements should be considered in an Environmental Impact Assessment (EIA): • Rule 1: Where traffic flows will increase by more than 30% (or the number of heavy goods vehicles (HGVs) will increase by more than 30%).	The Applicant notes this comment. The methodology is referenced in paragraph 13.6.25 of **ES Volume 1, Chapter 13: Transport and Access [APP-065].**
CNL-113	Landscape and Visual Transport and Access	Impacts upon the Tranquillity of the CNL (PMIE 4)	• Rule 2: Any other sensitive areas where traffic flows have increased by 10% or more.	The Applicant makes note of the comment. The methodology is referenced in paragraph 13.6.25 of **ES Volume 1, Chapter 13: Transport and Access [APP-065].**
CNL-114	Landscape and Visual Transport and Access	Impacts upon the Tranquillity of the CNL (PMIE 4)	National Landscapes (AONBs) are specifically identified as 'sensitive areas' in the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. As such, Rule 2 should be applied in the Cotswolds National Landscape and should relate to both traffic flows and HGV movements. On this basis, it can be argued that an increase in traffic flows or HGV movements of more than 10% from a development proposal or in combination with other proposals is likely to be significant and have an adverse impact on the tranquillity of the Cotswolds National Landscape. This would apply to traffic movements on roads along the CNL boundary as well as	Rule 1 has been applied to the links in the CNL as agreed with Wiltshire Council. They were identified as 'medium' sensitivity in Table 13-4 of **ES Volume 1, Chapter 13: Transport and Access [APP-065]**. This is in accordance with the sensitivity definitions set out in Table 13-3 and is based upon the interpretation of guidance set out in paragraphs 1.28 to 1.32 of the Institute of Environmental Management and Assessment (IEMA) Guidelines: Environmental Assessment of Traffic and Movement.

			to traffic movements on roads within the CNL.	

CNL-115	Landscape and Visual Transport and Access	Impacts upon the Tranquillity of the CNL (PMIE 4)	Having reviewed ES Volume 1 Chapter 13, the CNL is not considered as a receptor in respect of the potential impacts of increased traffic flows. Indeed, the designation is only mentioned at paragraph 13.6.24. For the reasons outlined above, we consider that the Environmental Statement should consider the CNL as a sensitive receptor (high sensitivity) and consider the potential for significant environmental effects upon it in line with Rule 2 referred to above.	The CNL has been considered as a receptor in respect of potential impacts of increased traffic flows in **ES Volume 1, Chapter 13: Transport and Access [APP-065].**The CNL is identified as a sensitive receptor and the links within this receptor have been identified as having a 'medium' sensitivity in Table 13-4. This position is agreed with Wiltshire Council as set out in Paragraph 20, Appendix A of their relevant representation. The assessment of transport impact has then been undertaken in accordance with the Institute of Environmental Management and Assessment (IEMA) Guidelines: Environmental Assessment of Traffic and Movement.

CNL-116	Landscape and Visual Transport and Access	Impacts upon the Tranquillity of the CNL (PMIE 4)	Figure 13.1 of the ES shows a proposed construction traffic route to serve Sites A, B and C which runs from M4 J18 through the CNL along the A46, B4040, B4039, an unnamed road east to Grittleton and then the Alderton Road and Fosse Way, leaving the CNL at the crossroads with Fosse Lodge. The route then continues outside of the CNL up the Fosse Way.	The Applicant notes this comment
CNL-117	Landscape and Visual Transport and Access	Impacts upon the Tranquillity of the CNL (PMIE 4)	Table 13-24 identifies that overall traffic flows along the B4040, the unnamed road west of Grittleton, Alderton Road and Fosse Way all within the CNL would exceed the 10% threshold in terms of total traffic. Increases in HGV flows along these roads would also exceed the 10% threshold along these routes as well as along the B4039. HGV flows would increase by between 68.5% and 250% on these routes and as such even the 30% rule of thumb would be breached.	As shown in Table 13-5 of **ES Volume 1, Chapter 13: Transport and Access [APP-065]**, the 30% threshold for further assessment for HGV traffic was exceeded along these roads. Additional assessment work was undertaken in accordance with the IEMA guidelines as presented in Paragraph 13.10.33 to 13.10.59.
CNL-118	Landscape and Visual Transport and Access	Impacts upon the Tranquillity of the CNL (PMIE 4)	Using Table 13-4, there would be a medium or high magnitude of impact for a number of these roads and when combined with the high sensitivity of the CNL, this would indicate a major or major/moderate adverse effects on its Tranquillity in multiple locations. Statement	The CNL has been considered as a receptor in respect of potential impacts of increased traffic flows in **ES Volume 1, Chapter 13: Transport and Access [APP-065].**The CNL is identified as a sensitive receptor and the links within this receptor have been identified as having a 'medium' sensitivity in Table 13-4. This position is agreed with Wiltshire Council as set out in Paragraph 20, Appendix A of their relevant representation. The assessment of transport impact has then been undertaken in accordance with the Institute of Environmental Management and Assessment (IEMA) Guidelines: Environmental Assessment of Traffic and Movement.

				In landscape terms, the standalone assessment of effects on the CNL and its Special Qualities in **Appendix 8-6 Assessment of Effects on the Cotswolds National Landscape and its Special Qualities [APP-197]** recognises that the Sensitivity of the CNL's Special Quality on Tranquillity is High. The Applicant will submit the Technical Note on Tranquillity at Deadline A.
CNL-119	Landscape and Visual Transport and Access	Impacts upon the Tranquillity of the CNL (PMIE 4)	Whilst it is recognised that construction traffic would be temporary and that the high percentage changes in HGVs typically reflect a low baseline number of HGVs, the construction phase would last around two years and the actual increase of HGVs travelling along the link which experiences the highest increase in HGV traffic, Alderton Road, the increase of HGVs is still 50 movements a day which is a significant number for a minor road.	As set out in the **outline Construction Traffic Management Plan (CTMP) [APP-287],** a booking system will be set up to manage arrivals and departures to the Order Limits. This will prevent HGVs generated by the Scheme passing each other in opposite directions on the local roads forming part of the construction routes (including this route) and will be confirmed as part of the final CTMP. The **outline CTMP [APP-287]** includes measures to manage deliveries and restricted hours of deliveries outside of peak hours in order to minimise any detrimental impacts on the local highway network. **ES Volume 1, Chapter 13: Transport and Access [APP-065]** identifies the links in the CNL. The links are identified as 'medium' sensitivity as agreed with Wiltshire Council. Construction traffic would be temporary. The construction traffic is managed through a Final CTMP which is a requirement of the DCO. Road condition surveys will ensure any damage

				to the highway network caused by construction traffic is rectified. **ES Volume 1, Chapter 13: Transport and Access [APP-065]** concludes that the impact would be negligible to minor adverse. The Applicant will submit the Technical Note on Tranquillity at Deadline A.
CNL-120	Landscape and Visual Transport and Access	Impacts upon the Tranquillity of the CNL (PMIE 4)	As well as impacts upon tranquillity, the construction route has other potential adverse landscape implications. The proposed route serving Sites A, B and C runs through two separate LCTs within the CNL, the High Wold Dip Slope (LCT 9) for the stretch up the A46 and east along the B4040 for roughly half the distance between the A46 junction and Acton Turville and Dip Slope Lowland (LCT 11) for the remainder of the route until it leaves the CNL at Fosse Lodge.	See findings set out in the Technical Note on Tranquillity which will be submitted at Deadline A
CNL-121	Landscape and Visual Transport and Access	Impacts upon the Tranquillity of the CNL (PMIE 4)	Sections 9.13 and 11.12 of the Cotswolds AONB Landscape Strategies and Guidelines referred to above identify 'Road upgrading and improvements, especially of minor country roads, as a result of development or general improvement schemes' as a local force for change with potential adverse landscape implications. Sections 9.14 and 11.13 identify 'Excessive traffic and/or speed on minor local roads and lanes and increase in size of vehicle using lanes' as a further local force for change. These sections identify increased traffic movements, loss of tranquillity, danger to walkers/riders and other non-motorised users and damage to verges and	As set out in the **outline Construction Traffic Management Plan (CTMP) [APP-287],** a booking system will be set up to manage arrivals and departures to the Order Limits. This will prevent HGVs generated by the Scheme passing each other in opposite directions on the local roads forming part of the construction routes (including this route) and will be confirmed as part of the final CTMP. The **outline CTMP [APP-287]** includes measures to manage deliveries and restricted hours of deliveries outside of peak hours in order to minimise any detrimental impacts on the local highway network. **ES Volume 1, Chapter 13: Transport**

			roadside boundaries by HGVs as potential adverse landscape implications.	**and Access [APP-065]** identifies the links in the CNL. The links are identified as 'medium' sensitivity as agreed with Wiltshire Council. Construction traffic would be temporary. The construction traffic is managed through a Final CTMP which is a requirement of the DCO. Road condition surveys will ensure any damage to the highway network caused by construction traffic is rectified. **ES Volume 1, Chapter 13: Transport and Access [APP-065]** concludes that the impact would be negligible to minor adverse. The landscape implications of the traffic routes and Indivisible Abnormal Loads are assessed in **Appendix 8-6 Assessment of Effects on the Cotswolds National Landscape and its Special Qualities [APP-197].** The assessment notes a number of works required including widening and passing bays to accommodate the AILs which have been assessed for any landscape and visual effects. There are three small sections on the route within the CNL where works to trees are required. This includes cutting back or trimming of hedgerows rather than removing/loss and the effect on Landscape and Visual Receptors would be temporary and would be Negligible (Not Significant).

CNL-122	Landscape and Visual Transport and Access	Impacts upon the Tranquillity of the CNL (PMIE 4)	As such we still consider it likely that construction traffic would have a significant adverse impact upon the tranquility of the National Landscape, one of its special qualities, and this would conflict with Policy CE5 of the CNL Management Plan. It would also not seek to further the purposes of CNL designation.	**ES Volume 1, Chapter 13: Transport and Access [APP-065]** identifies the links in the CNL. The links are identified as 'medium' sensitivity as agreed with Wiltshire Council. Construction traffic would be temporary. The construction traffic is managed through a Final Construction Traffic Management Plan which is a requirement of the DCO. Road condition surveys will ensure any damage to the highway network caused by construction traffic is rectified. **ES Volume 1, Chapter 13: Transport and Access [APP-065]** concludes that the impact would be negligible to minor adverse. The Applicant will submit the Technical Note on Tranquillity at Deadline A.

CNL-123	Landscape and Visual Transport and Access	Impacts upon the Tranquillity of the CNL (PMIE 4)	Therefore, at this stage our position in terms of PMIE 4 is that construction traffic should be routed outside of the CNL to avoid significant adverse impacts upon its tranquillity and landscape and scenic beauty.	The CNL has been considered as a receptor in respect of potential impacts of increased traffic flows in **ES Volume 1, Chapter 13: Transport and Access [APP-065].** The CNL is identified as a sensitive receptor and the links within this receptor have been identified as having a 'medium' sensitivity in Table 13-4. This position is agreed with Wiltshire Council as set out in Paragraph 20, Appendix A of their Relevant Representation. The assessment of transport impact has then been undertaken in accordance with the Institute of Environmental Management and Assessment (IEMA) Guidelines: Environmental Assessment of Traffic and Movement. The proposed construction routes are the most direct suitable routes for accessing the proposed Lime Down Solar PV Sites and Cable Route Corridor. The route is suitable because the majority of it uses A-roads and B-roads and connects directly to the Strategic Road Network, reducing journey times and the use of alternative and inappropriate routes. The location of Lime Down A B and C, are adjacent to the CNL. Only one possible route exists to these sites that avoids the CNL, via Norton which is unsuitable as it is single track narrow road for long sections with limited visibility, so was ruled out. There is a motorway and a trainline in the CNL and our construction route sits between the two.

				The transport impacts of the scheme will be temporary and managed by mitigation measures set out in the **outline Construction Traffic Management Plan (CTMP) [APP-287].** These mitigation measures include restrictions on delivery times and a booking system to limit the potential for construction vehicles meeting on minor roads. The Applicant will submit the Technical Note on Tranquillity at Deadline A.
CNL-124	Landscape and Visual	Potential Compensation Measures for Residual Adverse Effects (PMIE 8)	PMIE 8 relates to agreed details regarding potential appropriate measures to compensate for the residual adverse effects of the development on the natural beauty of the CNL and its setting to enable the statutory duty to seek to further the conservation and enhancement of its natural beauty (Section 85 of the Countryside and Rights of Way Act 2000) to be discharged.	The Applicant notes this comment.

CNL-125	Landscape and Visual	Potential Compensation Measures for Residual Adverse Effects (PMIE 8)	The Secretary of State has a duty under Section 85 of the Countryside and Rights of Way Act 2000, as a 'relevant authority', to seek to further the conservation and enhancement of the CNL's natural beauty in determining this application. DEFRA guidance for relevant authorities states that as far as is reasonably practical, relevant authorities should seek to avoid harm and contribute to the conservation and enhancement of the natural beauty, special qualities, and key characteristics of Protected Landscapes. This goes beyond mitigation and like for like measures and replacement. The proposed measures to further the statutory purpose of a National Landscape should explore what is possible in addition to avoiding and mitigating the effects of the development, and should be appropriate, proportionate to the type and scale of the development and its implications for the area and effectively secured.	The Applicant notes this comment.
CNL-126	Landscape and Visual	Potential Compensation Measures for Residual Adverse Effects (PMIE 8)	The 'seek to further' duty does not preclude decisions that are 'net harmful' to the natural beauty of a National Landscape. However, positive evidence is required to demonstrate that the relevant authority has, in all the circumstances, sought to further the purpose, not merely through mitigation of harm but by taking all reasonable steps to further the purpose.	The Applicant notes this comment.

CNL-127	Landscape and Visual	Potential Compensation Measures for Residual Adverse Effects (PMIE 8)	Without prejudice, if the Secretary of State is minded to permit this DCO application, he should provide proportionate, reasoned, and documented evidence to demonstrate how he sought to further the purpose, not merely through mitigation of harm but by taking all reasonable steps to further the purpose. If it is not practicable or feasible to take measures to further this purpose, the Secretary of State should provide evidence to show why it is not practicable or feasible.	With reference to the 'Positive contributions to further the purpose of the AONB designation' set out in Section 3.5 of **Appendix 8-6 Assessment of Effects on the Cotswolds National Landscape and its Special Qualities [APP-197]** the Applicant is confident that the SoS would conclude the purposes will be furthered. As set out in the Appendix, the beneficial effects of the Scheme within the setting of the CNL in Sites A, B and C are not merely mitigating harm as this has been achieved through the avoidance measures embedded within the scheme to protect the CNL as set out in paragraphs 2.3.5- 2.3.8 of **Appendix 8-6 Assessment of Effects on the Cotswolds National Landscape and its Special Qualities [APP-197]**.
CNL-128	Landscape and Visual	Potential Compensation Measures for Residual Adverse Effects (PMIE 8)	The Board does not consider that all reasonably practicable steps have yet been taken to seek to further the purpose of designation and, therefore, the seek to further duty cannot yet be adequately met. DEFRA guidance also states that consideration should be given to the appropriateness of compensation measures and as such, the Board recommends that this is considered as part of the DCO Examination and the Board anticipates providing the Examination with recommendations relating to appropriate compensation measures.	The Applicant notes this comment.

CNL-129	Landscape and Visual	Conclusion	Conclusion As far as the eight PMIEs (outlined above) previously discussed between the applicant and the Board are concerned, we consider that PMIEs 2, 3 and 5 have been resolved and in the case of PMIE 7, we have provided further recommendations for the OLEMP and OEMPS which can be addressed through the subsequent submission of detailed LEMP and EMPS, should the DCO be granted.	The Applicant notes this comment.
CNL-130	Landscape and Visual	Conclusion	The Board recommends that PMIEs 1, 4, 6 and 8 should be considered during the DCO Examination and looks forward to providing more detailed comments in response to the Examining Authorities' questions on these matters later in the Examination period.	The Applicant notes this comment.
CNL-131	Landscape and Visual	Conclusion	As outlined above, the Applicant has recently sent the Board a Technical Note relating to the effects of the proposed scheme on the tranquillity of the CNL (PMIE 4). As this Technical Note has not yet been submitted to the Planning Inspectorate as an Additional Submission and therefore is not in front of the Examining Authority or other parties for comment as part of this consultation, the Board has not considered the content of the Technical Note within these Relevant Representations and will consider it in due course during the Examination, should it be submitted. The Board also acknowledges the applicant's intention to agree a Statement of Common Ground with the Board in advance of the Examination and awaits a draft of this	The Applicant will submit the Technical Note on Tranquillity at Deadline A.

			document for review and comment in early 2026. Please do not hesitate to contact me if you wish to discuss this response further. Yours sincerely, Simon Joyce MRTPI Planning Officer Cotswolds National Landscape	

3.5 National Highways

Table 3-5 RR-3426

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
NH-001	Description and DCO Process	Introduction	1 Introduction 1.1 This relevant representation is National Highways' (National Highways) formal written response to the application by Lime Down Solar Ltd ("*Applicant*") for an order granting development consent for the Lime Down Solar Project ("*DCO*"). This relevant representation sits alongside and supplements the previous relevant representation submitted by National Highways in connection with the DCO. The Applicant seeks development consent for proposed authorised development described in Schedule 1 of the draft DCO ("*Authorised Development*").	The Applicant notes this comment.

NH-002	Transport and Access	Objection	1.2 National Highways objects to the DCO and the Authorised Development for the following reasons: (a) The book of reference as submitted by the Applicant identifies 23 plots of land owned or occupied by National Highways for the purposes of its undertaking ("*Plots*") in respect of which compulsory acquisition powers are sought. The compulsory acquisition powers sought are described in the book of reference as Acquisition of Rights and Temporary Possession (Part One of the Book of Reference). A number of the same National Highways plots then appear in Part 2 (potential claimants) and Part 3 of the Book of Reference (plots where National Highways enjoys either an easement over the land or a private right but where pursuant to the DCO it is proposed the easement or other private right shall be extinguished, suspended or interfered with ("*Compulsory Powers*"). To safeguard National Highways' interests and the safety and integrity of the Strategic Road Network ("*SRN*"), National Highways objects to the inclusion of the Plots in the DCO and to Compulsory Powers being granted in respect of them. The Plots constitute land acquired by National Highways for the purpose of maintaining its statutory undertaking and, accordingly, this representation is made under sections 127 and 138 of the Planning Act 2008. National Highways considers that there is no compelling case in the public interest	The Applicant acknowledges the comments made by this party, and confirms that details of the permanent and temporary rights to be acquired are set out in the **Book of Reference [APP020]**, specifically in Sections 4 and 5 on pages 9, 10, and 11. The Applicant also acknowledges the comments made in regards to the Protective Provisions and the applicant is actively engaging with the respondent's professional representative to agree appropriate and reasonable measures to ensure operational continuance, updates of which will be captured in the **Land and Rights Negotiations Tracker [APP-021]**. Part 5 of Schedule 15 (given effect by Article 45 (Protective Provisions)) to the **draft Development Consent Order [APP-016]** also contains draft Protective Provisions for the benefit of National Highways which are intended to safeguard the operation, safety and integrity of the Strategic Road Network and to ensure that any exercise of powers affecting National Highways' land, rights or assets is appropriately controlled. The Applicant is progressing discussions with National Highways in respect of the Protective Provisions.

			for the Compulsory Powers over the Plots without the inclusion of National Highways' protective provisions and that the grant of the DCO without such provisions would result in serious detriment to the SRN.	
NH-003	Transport and Access	Objection	(b) The DCO includes a number of provisions which authorise the interference with statutory powers belonging to National Highways and/or grant the Applicant powers over the SRN which would have significant safety implications if not properly and proportionately controlled through National Highways' protective provisions. These include articles 8, 10, 11, 12, 16, 17, 19, 20, 21, 24, 25, 27, 29, 30, 31, 32, 33, 34, 38, 40, 41, 42 and 47.	As noted in the Applicant's previous response, Part 5 of Schedule 15 (given effect by Article 45 (Protective Provisions)) to the **draft Development Consent Order [APP-016]** contains draft Protective Provisions for the benefit of National Highways. The Applicant is progressing discussions with National Highways in respect of the Protective Provisions.
NH-004	Transport and Access	Objection	(c) National Highways requires additional information regarding the proposed works no 5A and 8A outlined in Schedule 1 to the draft order in relation to their impact on the SRN. The nature and scope of the proposed works affecting the SRN is currently unclear. Without the appropriate level of information, it is not possible to effectively assess or manage the potential impact on the SRN. The inclusion of National Highways' protective provisions at Appendix 1 are required to ensure the necessary information is provided at the relevant stages.	A description of the Scheme is presented in **ES Volume 1, Chapter 3: The Scheme [APP-055]**. The Cable Route corridor crossing of the M4 is proposed as a fully trenchless HDD installation, with launch and reception pits located South and North of the carriageway. The motorway runs east-west through the site with the HDD crossing passing beneath both the eastbound and westbound carriageways. The HDD will be located at a minimum depth to cover of 11.6m below the M4 carriageway. No excavation, pavement breaking, or physical works are required within the M4 carriageway. Surface monitoring will be undertaken using reflector-less total

				stations positioned off carriageway, meaning no lane access is required. As noted in the Applicant's previous response, Part 5 of Schedule 15 (given effect by Article 45 (Protective Provisions)) to the **draft Development Consent Order [APP-016]** contains draft Protective Provisions for the benefit of National Highways. The Applicant is progressing discussions with National Highways in respect of the Protective Provisions.
NH-005	Description and DCO Process	Objection	1.3 National Highways reserves the right to produce additional grounds of objection to the Examining Authority as the DCO progresses should National Highways consider it necessary if any further information relating to the impact on the SRN comes to light.	The Applicant notes this comment.
NH-006	Description and DCO Process	Introduction	2 National Highways 2.1 National Highways (being the statutory successor to the Highways Agency) is an arms-length government owned company responsible for the ownership, management and improvement of England's motorways and major A-roads, collectively referred to as the strategic road network ("*SRN*"). The SRN comprises over 4,500 miles of road sitting at the core of the national transport system, connecting all major economic and	The Applicant notes this comment.

			resource centres with key markets and conurbations. The SRN is the most heavily used part of the national road network, carrying a third of all traffic and two-thirds of all freight totalling approximately 4 million journeys a day. It provides businesses with the means to get products and services to their customers, gives access to labour markets and suppliers, and encourages trade and new investment. It is also a complex network of highway structures, drainage and attenuation apparatus and telemetry and electronic communication assets. In short, the SRN is a critical piece of economic infrastructure, vital to the nation's connectivity and the means for generating economic growth.	
NH-007	Description and DCO Process	Introduction	2.2 National Highways is appointed pursuant to section 1 of the Infrastructure Act 2015 to act as the highway authority, traffic authority and street authority for the SRN. The effect of this appointment is to make National Highways the statutory custodian of this national asset, conferring on it the status and legislative functions of a strategic highways company.	The Applicant notes this comment.
NH-008	Description and DCO Process	Introduction	2.3 As a strategic highways company, National Highways must comply with a number of general and specific statutory duties, including to: (a) co-operate in so far as reasonably practicable with other persons exercising functions which relate to highways or planning; (b) have regard to the effect of the	The Applicant notes this comment.

			exercise of its functions on the environment; (c) have regard to the effect of the exercise of its functions on the safety of users of highways.	
NH-009	Description and DCO Process	Introduction	2.4 The Secretary of State for Transport may from time to time give a strategic highways company directions or guidance as to the manner in which it is to exercise its statutory duties and functions. For the purposes of directing the functions as regards the SRN, these directions are contained within the 2015 Licence. The directions contained in the 2015 Licence are mandatory and are regulated by the Office of Road and Rail. They include: (a) Paragraph 4.1 – The network for which the Licence holder is responsible is a critical national asset, which the Licence holder must operate and manage in the public interest, in respect of both current activities and needs and in providing effective stewardship of its long-term operation and integrity; (b) Paragraph 4.2 – Without prejudice to the general duties on the Licence holder under section 5 of the Infrastructure Act 2015, the Licence holder must, in exercising its functions and complying with its legal duties and other obligations, act in a manner which it considers best calculated to: i ensure the effective operation of the network;	The Applicant notes this comment.

			ii ensure the maintenance, resilience, renewal and replacement of the network; iii ensure the improvement, enhancement and long-term development of the network; iv ensure efficiency and value for money; v protect and improve the safety of the network; vi co-operate with other persons or organisations for the purposes of co-ordinating day-to-day operations and long-term planning; vii minimise the environmental impacts of operating, maintaining and improving its network and seek to protect and enhance the quality of the surrounding environment; viii conform to the principles of sustainable development. *1 Infrastructure Act 2015, s.5* *2 Highways England: licence (publishing.service.gov.uk)* *3 Infrastructure Act 2015, s.6(3)*	
NH-010	Description and DCO Process	Introduction	(c) Paragraph 5.37 – The Licence holder must hold and manage land and property in line with, and as a function of, the Licence holder's legal duties as a highway authority, and solely for the purposes of operating, managing and improving the highway, unless	The Applicant notes this comment.

			otherwise approved by the Secretary of State for Transport	
NH-011	Description and DCO Process	Introduction	(d) More particularly sections 41 and 130 of the Highways Act 1980 contain respectively a statutory duty for National Highways to ensure it maintains the SRN to the appropriate/sufficient standard, free from any hazards so it is safe to use, and a statutory duty to assert and protect the rights of the public in use and enjoyment of the SRN. Section 16 of the Traffic Management Act 2004 contains a statutory Network Management Duty for National Highways to manage the SRN with a view to achieving, so far as may be reasonably practicable having regard to National Highways' other obligations, policies and objectives, securing the expeditious movement of traffic on the SRN and facilitating the same on roads where another authority is the traffic authority. In order to achieve this, the action National Highways may take in performing that duty includes that which National Highways considers will contribute to securing the more efficient use of the SRN or avoidance, elimination or reduction of disruption to the above relevant roads and may involve the exercise of any power to regulate or co-ordinate the uses made of any road (or part of a road) in the road network (whether or not the power was conferred on them in their capacity as a traffic authority). Section 17 of the Traffic Management Act 2004 requires	The Applicant notes this comment.

			that National Highways shall make such arrangements as they consider appropriate for planning and carrying out the action to be taken in performing its Network Management Duty and has to establish processes to, as far as reasonably practicable, identify things (including future occurrences) which are causing, or have potential to cause SRN congestion or other disruption to the movement of traffic on it and consider any possible action that could be taken in response to (or anticipation of) anything so identified, e.g. in the event National Highways considers this particular statutory duty may not be met. Supplementary to this, 4.2 of National Highways' statutory licence requires National Highways to act in a manner which it considers best calculated to ensure the effective operation of the SRN. To comply with this, Paragraph 5.1 states that National Highway should seek to minimise disruption to road users that might reasonably be expected to occur as a result of planned or unplanned disruption to the network, as well as proactively and reactively provide relevant, accurate and timely information about traffic and conditions on the SRN to road users, including when there is disruption. This range of duties demonstrates that National Highways must always protect road users/the SRN and ensure the SRN retains its integrity, is free from hazard/safe to use and is available for continual uncongested use all year round subject to precise terms of its	

			Network Management Duty which means National Highways is duty bound to consider carefully any activity that has the potential to impact on any of National Highways' statutory duties.	
NH-012	Description and DCO Process	Introduction	2.5 Under section 5(2)(b) of the Infrastructure Act 2015, National Highways is under a duty to have regard to the safety of highway users. Safety is at the heart of National Highways' function as a statutory undertaker – the safety of the travelling public, the safety of National Highways' staff and the safety of third party contractors on the network. The SRN is	The Applicant notes this comment.

			inherently a dangerous network to operate on, over and under – given the very limited control that National Highways has on road users operating at high speeds. The potential for catastrophic damage or injury from collision is prevalent – which is precisely why National Highways has strict procedures for contractors operating on, over or under the SRN, particularly those which it does not itself control.	
NH-013	Transport and Access	Protecting the SRN	3 Protecting the SRN 3.1 Unlike other statutory consultees involved in the consenting of nationally significant infrastructure projects, National Highways is a very active promoter of development consent orders and understands keenly the pressures and requirements placed on applicants to balance the delivery of the scheme with the protections afforded to statutory consultees. National Highways has been at the vanguard of DCO-consented development since the Planning Act 2008 was introduced and has offered many commitments for the protection of electricity and gas apparatus, water and drainage infrastructure, railway undertakings and other infrastructure owned by statutory consultees as a consequence of its own development consent orders. The SRN deserves the same measure of protection, proportionate to the extent of interference caused by the Authorised Development.	The Applicant notes this comment.

NH-014	Transport and Access	Commitments	3.2 National Highways understands the need for proportionality in the context of such protections and considers that a proportionate level of protection in all cases and as a minimum standard where there is the potential for impact to the SRN should be the following: (a) that National Highways be held harmless from the impact of third party development;	Part 5 of Schedule 15 (given effect by Article 45 (Protective Provisions)) to the **draft Development Consent Order [APP-016]** contains draft Protective Provisions for the benefit of National Highways. The Applicant is progressing discussions with National Highways in respect of the Protective Provisions.
NH-015	Transport and Access	Commitments	(b) that National Highways procedures put in place for the protection of property and persons are adhered to in accordance with National Highways' strict requirements on network occupancy;	As noted above, the Applicant is progressing discussions with National Highways in respect of the form of Protective Provisions to be contained within the **draft Development Consent Order [APP-016].**
NH-016	Transport and Access	Commitments	(c) that any works carried out to the highway, on National Highways' land, underneath the highway, above the highway and to apparatus forming part of the highway estate should be certified by National Highways and approved by National Highways on completion of the works;	As noted above, the Applicant is progressing discussions with National Highways in respect of the form of Protective Provisions to be contained within the **draft Development Consent Order [APP-016].**
NH-017	Transport and Access	Commitments	(d) that financial provision should be put in place to ensure that in the event of the Applicant commencing works which may impact the SRN (including for example, underground works beneath the SRN or oversailing above it) and falling into financial difficulty or defaulting on completion of the works, National Highways has the resources needed to put the SRN and the highway estate into the position it was in before the Applicant commenced works;	As noted above, the Applicant is progressing discussions with National Highways in respect of the form of Protective Provisions to be contained within the **draft Development Consent Order [APP-016].**

NH-018	Transport and Access	Commitments	(e) that National Highways be indemnified for any loss or damage to the SRN or the highway estate as a result of the works;	As noted above, the Applicant is progressing discussions with National Highways in respect of the form of Protective Provisions to be contained within the **draft Development Consent Order [APP-016].**
NH-019	Transport and Access	Commitments	(f) that the Applicant requests approval from National Highways before exercising any powers under the DCO in relation to the SRN or the highway estate (such approval not to be unreasonably withheld) to enable proportionate rights and reservations to be secured for the protection of the SRN through private treaty;	As noted above, the Applicant is progressing discussions with National Highways in respect of the form of Protective Provisions to be contained within the **draft Development Consent Order [APP-016].**
NH-020	Transport and Access	Commitments	(g) that emergency procedures be agreed for National Highways to access the SRN to carry out works or remove dangerous obstacles resulting from the Authorised Development which pose a risk to life. 3.3 These provisions are included in the National Highways protective provisions.	As noted above, the Applicant is progressing discussions with National Highways in respect of the form of Protective Provisions to be contained within the **draft Development Consent Order [APP-016].**
NH-021	Transport and Access	SRN	3.4 National Highways considers that without the National Highways protective provisions, there is a considerable risk of serious detriment to the SRN, as any damage or injury to the SRN or wider highway estate would require funding to rectify that is not within National Highways' budget. There is no recourse to public funding for emergency works of this nature and a reserve of funding is not available. Without prejudice to whether the Authorised Development would cause a serious detriment to the SRN, it	As noted above, the Applicant is progressing discussions with National Highways in respect of the form of Protective Provisions to be contained within the **draft Development Consent Order [APP-016].**

			remains the case that the public purse should not be left to meet or subsidise costs of impacts caused by third party development to the SRN.	
NH-022	Transport and Access	SRN	3.5 Further, National Highways' estate comprises more than just the corpus of the highway (the 'top two spits'). Unlike local roads, where the local highway authority typically controls only the highway strata and sufficient vertical limits above and beneath the highway to maintain necessary apparatus and street furniture, in most cases National Highways controls the freehold of the land beneath the highway to the centre of the earth and to the heavens above. This estate is held for the benefit of the statutory undertaking, to ensure that the SRN is not compromised and that maintenance or improvement works at any required depth can take place free from risk of trespass or ransom. Where apparatus is co-located in the highway (which is commonplace), that apparatus has been authorised by National Highways or has been installed through industry standard processes (such as under the New Roads and Street Works Act 1991), where statutory protection is afforded to National Highways as the highway or street authority. Whilst National Highways is prepared to grant a sub surface interest or right to co-locate apparatus in the highway, where it is geotechnically possible and respecting other apparatus that is in,	As noted above, the Applicant is progressing discussions with National Highways in respect of the form of Protective Provisions to be contained within the **draft Development Consent Order [APP-016].**

			on, under or over the highway – the interest must be proportionate and necessary and cannot be to the detriment of National Highways, the SRN or other undertakers. It cannot be acceptable that apparatus is placed in, on, under or over the SRN through a DCO by disapplying statutory protections that National Highways has and not accepting to acquiesce to the terms which are required by National Highways to manage its network in accordance with regulatory requirements.	
NH-023	Transport and Access	SRN	3.6 For the sake of clarity and transparency, National Highways has no desire to stymy development or to impose requirements on the Applicant which are disproportionate to the potential harm that could be caused to the SRN. National Highways is legally obliged to co-operate with third parties exercising planning or highway functions, which includes the Applicant in this statutory process. National Highways is prepared to engage fully and assist in whatever way is reasonable to ensure that the Authorised Development proceeds as quickly and efficiently as possible. 4 *Section 5(1) Infrastructure Act 2015*	The Applicant notes this comment.

NH-024	Transport and Access	The Proposed Works	4 The Proposed Works 4.1 The authorised development is situated largely within the administrative boundary of Wiltshire Council, with small areas of existing highway within the administrative areas of South Gloucestershire Council. It is proposed as being built across five land parcels comprising approximately 749 hectares located to the north of the M4, southwest of Malmesbury. The electricity generated by the solar park is expected to be exported to the national grid at Melksham Substation by installing an underground cable. The cable route corridor follows an alignment south from the on-site 400 kV substations, going across the M4 near Sevington then to the east of Yatton Keynell continuing to run south across the A420 east of Corsham until it reaches Melksham Substation. The M4 is part of the Strategic Road Network. It is also noted that Cable Route Corridor passes under the M4 between junctions 17 and 18. The Authorised Development includes Works no 5a and 8a in the DCO which will interface with the M4 motorway and is therefore of interest to National Highways.	The Applicant also notes National Highways' identification of the M4 as part of the SRN and its interest in Scheme elements where the cable route passes under or interfaces with the motorway between Junctions 17 and 18, including Works Nos. 5a and 8a. The Applicant confirms that the M4 crossing on the cable route corridor is proposed as a fully trenchless HDD installation, with launch and reception pits located South and North of the carriageway respectively. The motorway runs east-west through the site with the HDD crossing passing beneath both the eastbound and westbound carriageways. The HDD will be located at a minimum depth to cover of 11.6m below the M4 Carriageway. No excavation, pavement breaking, or physical works are required within the M4 carriageway. Surface monitoring will be undertaken using reflector-less total stations positioned off carriageway, meaning no lane access is required.

NH-025	Transport and Access	Works No 5a	Works No 5a 4.2 National Highways requires information in order to understand how the cable route, including its construction, will interact with National Highways' assets	A description of the Scheme is presented in **ES Volume 1, Chapter 3: The Scheme [APP-055]**, with additional detail on the cable route presented in **Appendix 3-1: Cable Route Construction Method Statement [APP-183]**.
NH-026	Transport and Access	Works No 5a	4.3 The details set out at paragraph 4.2 need to be agreed with National Highways. Any proposed directional drilling under our network will require compliance with The Design Manual for Roads and Bridges (DMRB) Chapter CD622 (Managing Geotechnical Risk). We advise the Applicant to review the requirements of CD622, which can be found on the Standards for Highways website. National Highways will also need to approve the design information in relation to works No 5a to ensure National Highways' assets will not be compromised by the authorised works. Paragraph 7 of National Highways protective provisions at Appendix 1 secures this approval and requirements set out within this paragraph.	As noted above, the Applicant is progressing discussions with National Highways in respect of the form of Protective Provisions to be contained within the **draft Development Consent Order [APP-016].**

NH-027	Transport and Access	Works No 8A	Work No. 8A 4.4 National Highways requires information in order to understand the nature and extent of the works at works no 8a and how they will impact the SRN.	
NH-028	Transport and Access	Works No 8A	4.5 This information is required from the Applicant to confirm the scope and impact of the proposed works in this area. This includes any planned physical changes to the network, general arrangements, all traffic management layouts/arrangement, and road space booking proposals. All works effecting the SRN must be carried out in accordance with permanent design standards and designed to full compliant standard with Design Manual for Roads and Bridges, Manual of Contract Documents for Highway Works and Traffic Signs Regulations and General Directions to ensure the safety and integrity of the SRN. This needs to be reviewed and agreed with National Highways. The requirements for this information are set out within paragraph 7 of National Highways protective provisions at Appendix 1.	A description of the Scheme is presented in **ES Volume 1, Chapter 3: The Scheme [APP-055]**, with additional detail on the cable route presented in **Appendix 3-1: Cable Route Construction Method Statement [APP-183]**. As noted previously, the Applicant is progressing discussions with National Highways in respect of the form of Protective Provisions to be contained within the **draft Development Consent Order [APP-016].**
NH-029	Transport and Access	Purpose 1, 2, and 3 set out in Page 7 and 8 on the National Highways Submission	Plot: 09-018 Owner: National Highways Acquisition Category: Acquisition of Rights Works Proposed: Purpose 2 National Highways Comment: We understand Works Sa affects this parcel of land which is subsoil to the M4. National Highways have been provided with limited information from	A description of the Scheme is presented in **ES Volume 1, Chapter 3: The Scheme [APP-055]**, with additional detail on the cable route presented in **Appendix 3-1: Cable Route Construction Method Statement [APP-183]**. As noted previously, the Applicant is progressing discussions with National

			the Applicant, so the nature and proposed scope of works remains unclear. National Highways require additional information about the works proposed. The Applicant should be required to obtain National Highways' consent in the event the activities affect the SRN or any land National Highways has an interest in. As a public body, National Highways' is under a duty to act reasonably in providing such consent and this is expressly provided in paragraph 7(4) of National Highways' proposed protective provisions at Appendix 1. Please also see our comments in connection with article 8 contained within the table at paragraph 6 below.	Highways in respect of the form of Protective Provisions to be contained within the **draft Development Consent Order [APP-016].**
NH-030	Transport and Access	Purpose 1, 2, and 3 set out in Page 7 and 8 on the National Highways Submission	Plot: 09-019 Owner: National Highways Acquisition Category: Acquisition of Rights Works Proposed: Purpose 2 National Highways Comment: We understand Works Sa effects this parcel of land which is subsoil to the M4. National Highways have been provided with limited information from the Applicant, so the nature and proposed scope of works remains unclear. National Highways require additional information about the works proposed. The Applicant should be required to obtain National Highways' consent in the event the activities affect the SRN or any land National Highways has an interest in. As a public body, National Highways' is under a duty to act reasonably in providing such	The Applicant acknowledges the comments made and the Applicant will actively engage with the respondent to reach an amicable solution. Updates of which will be captured in the **Land and Rights Negotiations Tracker [APP-021]**. A description of the Scheme is presented in **ES Volume 1, Chapter 3: The Scheme [APP-055]**, with additional detail on the cable route presented in **Appendix 3-1: Cable Route Construction Method Statement [APP-183]**. As noted previously, the Applicant is progressing discussions with National Highways in respect of the form of Protective Provisions to be contained

			consent and this is expressly provided in paragraph 7(4) of National Highways' proposed protective provisions at Appendix 1. Please also see our comments in connection with article 8 contained within the table at paragraph 6 below.	within the **draft Development Consent Order [APP-016].**
NH-031	Transport and Access	Purpose 1, 2, and 3 set out in Page 7 and 8 on the National Highways Submission	Plot: 09-020 Owner: National Highways Acquisition Category: Acquisition of Rights Works Proposed: Purpose 2 National Highways Comment: We understand Works Sa effects this parcel of land which is subsoil to the M4. National Highways have been provided with limited information from the Applicant, so the nature and proposed scope of works remains unclear. National Highways require additional information about the works proposed. The Applicant should be required to obtain National Highways' consent in the event the activities affect the SRN or any land National Highways has an interest in. As a public body, National Highways' is under a duty to act reasonably in providing such consent and this is expressly provided in paragraph 7(4) of National Highways' proposed protective provisions at Appendix 1. Please also see our comments in connection with article 8 contained within the able at paragraph 6 below.	The Applicant acknowledges the comments made and the Applicant will actively engage with the respondent to reach an amicable solution. Updates of which will be captured in the **Land and Rights Negotiations Tracker [APP-021]**. A description of the Scheme is presented in **ES Volume 1, Chapter 3: The Scheme [APP-055]**, with additional detail on the cable route presented in **Appendix 3-1: Cable Route Construction Method Statement [APP-183]**. As noted previously, the Applicant is progressing discussions with National Highways in respect of the form of Protective Provisions to be contained within the **draft Development Consent Order [APP-016].**

NH-032	Transport and Access	Purpose 1, 2, and 3 set out in Page 7 and 8 on the National Highways Submission	Plot: 09-021 Owner: National Highways Acquisition Category: Acquisition of Rights Works Proposed: Purpose 2 National Highways Comment: We understand Works Sa effects this parcel of land which is subsoil to the M4. National Highways have been provided with limited information from the applicant, so the nature and proposed scope of works remains unclear. National Highways require additional information about the works proposed. The Applicant should be required to obtain National Highways' consent in the event the activities affect the SRN or any land National Highways has an interest in. As a public body, National Highways' is under a duty to act reasonably in providing such consent and this is expressly provided in paragraph 7(4) of National Highways' proposed protective provisions at Appendix 1. Please also see our comments in connection with article 8 contained within the table at paragraph 6 below.	The Applicant acknowledges the comments made and the Applicant will actively engage with the respondent to reach an amicable solution. Updates of which will be captured in the **Land and Rights Negotiations Tracker [APP-021]**. A description of the Scheme is presented in **ES Volume 1, Chapter 3: The Scheme [APP-055]**, with additional detail on the cable route presented in **Appendix 3-1: Cable Route Construction Method Statement [APP-183]**. As noted previously, the Applicant is progressing discussions with National Highways in respect of the form of Protective Provisions to be contained within the **draft Development Consent Order [APP-016].**

NH-033	Transport and Access	Purpose 1, 2, and 3 set out in Page 7 and 8 on the National Highways Submission	Plot: 13-003 Owner: [REDACTED] Acquisition Category: Acquisition of Rights Works Proposed: Purpose 2 National Highways Comment: National Highways are noted in the Book of Reference as a category 2 person in respect of a right to install, maintain and remove electricity lines as contained in a Wayleave Consent dated 17 May 1956, 18 August 1967 and 22 February 1974. National Highways require additional information about the works proposed and the nature of existing rights in order to understand how these might impact the existing wayleave. The Applicant should be required to obtain National Highways' consent in the event the activities affect the SRN or any land National Highways has an interest in. As a public body, National Highways' is under a duty to act reasonably in providing such consent and this is expressly provided in paragraph 7(4) of National Highways' proposed protective provisions at Appendix 1.	The Applicant acknowledges the comments made and the Applicant will actively engage with the respondent to reach an amicable solution. Updates of which will be captured in the **Land and Rights Negotiations Tracker [APP-021]**. A description of the Scheme is presented in **ES Volume 1, Chapter 3: The Scheme [APP-055]**, with additional detail on the cable route presented in **Appendix 3-1: Cable Route Construction Method Statement [APP-183]**. As noted previously, the Applicant is progressing discussions with National Highways in respect of the form of Protective Provisions to be contained within the **draft Development Consent Order [APP-016].**

NH-034	Transport and Access	Purpose 1, 2, and 3 set out in Page 7 and 8 on the National Highways Submission	Plot: 13-005 Owner: [REDACTED], National Highways, Unknown, Wiltshire Council Acquisition Category: Temporary Possession Works Proposed: Purpose 3 National Highways Comment: Whilst the Book of Reference notes that National Highways are a Category 1 person in relation to the subsoil beneath the public highway, National Highways' investigations indicate that this road has now been detrunked and has been transferred to the LHA, following the detrunking order; The London-Bristol Trunk Road (A363 Junction, Bathford to A342 Junction, Pewsham) (Detrunking) Order 1977. The Applicant is requested to provide evidence to National Highways indicating its source for including National Highways in the Book of Reference for this parcel. Wiltshire Council are the highway authority for this part of Bath Road, A4. As National Highways are not the highway authority for Bath Road, A4, we do not have any comments in relation to the temporary possession of this plot.	National Highways were identified in plot 13-005 on the basis of assumed ad medium filum rights, given the plot's unregistered status and its proximity to land held by National Highways. In light of the clarification received from National Highways, the Applicant will update the Book of Reference at Deadline 1 to remove National Highways from the listed interests for this plot.

NH-035	Transport and Access	Purpose 1, 2, and 3 set out in Page 7 and 8 on the National Highways Submission	Plot: 13-006 Owner: National Highways, Wiltshire Council Acquisition Category: Temporary Possession Works Proposed: Purpose 3 National Highways Comment: National Highways interest in this plot is not clear from the Book of Reference. National Highways' investigations indicate that this road has now been detrunked and has been transferred to the LHA, following the detrunking order; The London-Bristol Trunk Road (A363 Junction, Bathford to A342 Junction, Pewsham) (Detrunking) Order 1977. The Applicant is requested to provide evidence to National Highways indicating its source for including National Highways in the Book of Reference for this parcel. Wiltshire Council are the highway authority for this part of Bath Road, A4, and since National Highways are not the highway authority for Bath Road, A4, we do not have any comments in relation to the temporary possession of this plot.	National Highways were originally identified as the freeholder for plot 13-006 because the registered title covering this land is held by the Secretary of State for Transport, and interests arising from such titles were historically attributed to National Highways following the transfer of titles within the Infrastructure Act 2015. In light of the clarification received from National Highways, the Applicant will update the Book of Reference at the next deadline to remove National Highways from the listed interests for this plot.

NH-036	Transport and Access	Purpose 1, 2, and 3 set out in Page 7 and 8 on the National Highways Submission	Plot: 13-008 Owner: National Highways Acquisition Category: Acquisition of Rights Works Proposed: Purpose 1 National Highways Comment: Whilst the Book of Reference notes that National Highways are a Category 1 person in relation to the subsoil beneath the public highway, National Highways' investigations indicate that this road has now been detrunked and has been transferred to the LHA, following the detrunking order; The London-Bristol Trunk Road (A363 Junction, Bathford to A342 Junction, Pewsham) (Detrunking) Order 1977. The Applicant is requested to provide evidence to National Highways indicating its source for including National Highways in the Book of Reference for this parcel. Wiltshire Council are the highway authority for this part of Bath Road, A4. As National Highways are not the highway authority for Bath Road, A4, we do not have any comments in relation to the acquisition of rights of this plot.	National Highways were identified in plot 13-008 on the basis of assumed ad medium filum rights, given the plot's unregistered status and its proximity to land held by National Highways. In light of the clarification received from National Highways, the Applicant will update the Book of Reference at the next deadline to remove National Highways from the listed interests for this plot.
NH-037	Transport and Access	Purpose 1, 2, and 3 set out in Page 7 and 8 on the National Highways Submission	Plot: 13-009 Owner: National Highways, Wiltshire Council Acquisition Category: Acquisition of Rights Works Proposed: Purpose 1 National Highways Comment: National Highways interest in this plot is not clear from the Book of Reference. National Highways' investigations indicate that this road has now been	National Highways were originally identified as the freeholder for plot 13-009 because the registered title covering this land is held by the Secretary of State for Transport, and interests arising from such titles were historically attributed to National Highways following the transfer of titles within the Infrastructure Act 2015. In light of the clarification received from National Highways, the Applicant will

			detrunked and has been transferred to the LHA, following the detrunking order; The London-Bristol Trunk Road (A363 Junction, Bathford to A342 Junction, Pewsham) (Detrunking) Order 1977. The Applicant is requested to provide evidence to National Highways indicating its source for including National Highways in the Book of Reference for this parcel. Wiltshire Council are the highway authority for this part of Bath Road, A4, and since National Highways are not the highway authority for Bath Road, A4, we do not have any comments in relation to the acquisition of rights of this plot.	update the Book of Reference at the next deadline to remove National Highways from the listed interests for this plot.
NH-038	Transport and Access	Purpose 1, 2, and 3 set out in Page 7 and 8 on the National Highways Submission	Plot: 13-012 Owner: National Highways Acquisition Category: Temporary Possession Works Proposed: Purpose 3 National Highways Comment: Whilst the Book of Reference notes that National Highways are a Category 1 person in relation to the subsoil beneath the public highway National Highways' investigations indicate that this road has now been detrunked and has been transferred to the LHA, following the detrunking order; The London-Bristol Trunk Road (A363 Junction, Bathford to A342 Junction, Pewsham) (Detrunking) Order 1977. The Applicant is requested to provide evidence to National Highways indicating its source for including National Highways in the Book of Reference for this parcel. Wiltshire Council are the highway authority for	National Highways were identified in plot 13-012 on the basis of assumed ad medium filum rights, given the plot's unregistered status and its proximity to land held by National Highways. In light of the clarification received from National Highways, the Applicant will update the Book of Reference at the next deadline to remove National Highways from the listed interests for this plot.

			this part of Bath Road, A4. As National Highways are not the highway authority for Bath Road, A4, we do not have any comments in relation to the temporary possession of this plot.	
NH-039	Transport and Access	Purpose 1, 2, and 3 set out in Page 7 and 8 on the National Highways Submission	Plot: 13-013 Owner: National Highways, Wiltshire Council Acquisition Category: Temporary Possession Works Proposed: Purpose 3 National Highways Comment: National Highways interest in this plot is not clear from the Book of Reference. National Highways' investigations indicate that this road has now been detrunked and has been transferred to the LHA, following the detrunking order; The London-Bristol Trunk Road (A363 Junction, Bathford to A342 Junction, Pewsham) (Detrunking) Order 1977. The Applicant is requested to provide evidence to National Highways indicating its source for including National Highways in the Book of Reference for this parcel. Wiltshire Council are the highway authority for this part of Bath Road, A4, and since National Highways are not the highway authority for Bath Road, A4, we do not	National Highways were originally identified as the freeholder for plot 13-013 because the registered title covering this land is held by the Secretary of State for Transport, and interests arising from such titles were historically attributed to National Highways following the transfer of titles within the Infrastructure Act 2015. In light of the clarification received from National Highways, the Applicant will update the Book of Reference at the next deadline to remove National Highways from the listed interests for this plot.

			have any comments in relation to the temporary possession of this plot.	
NH-040	Transport and Access	Purpose 1, 2, and 3 set out in Page 7 and 8 on the National Highways Submission	Plot: 13-014 Owner: National Highways, Wiltshire Council Acquisition Category: Temporary Possession Works Proposed: Purpose 3 National Highways Comment: National Highways interest in this plot is not clear from the Book of Reference. National Highways' investigations indicate that this road has now been detrunked and has been transferred to the LHA, following the detrunking order; The London-Bristol Trunk Road (A363 Junction, Bathford to A342 Junction, Pewsham) (Detrunking) Order 1977. The Applicant is requested to provide evidence to National Highways indicating its source for including National Highways in the Book of Reference for this parcel. Wiltshire Council are the highway authority for this part of Bath Road, A4, and since National Highways are not the highway authority for Bath Road, A4, we do not	National Highways were originally identified as the freeholder for plot 13-014 because the registered title covering this land is held by the Secretary of State for Transport, and interests arising from such titles were historically attributed to National Highways following the transfer of titles within the Infrastructure Act 2015. In light of the clarification received from National Highways, the Applicant will update the Book of Reference at the next deadline to remove National Highways from the listed interests for this plot.

			have any comments in relation to the temporary possession of this plot.	
NH-041	Transport and Access	Purpose 1, 2, and 3 set out in Page 7 and 8 on the National Highways Submission	Plot: 13-016 Owner: National Highways, Wiltshire Council Acquisition Category: Temporary Possession Works Proposed: Purpose 3 National Highways Comment: National Highways interest in this plot is not clear from the Book of Reference. National Highways' investigations indicate that this road has now been detrunked and has been transferred to the LHA, following the detrunking order; The London-Bristol Trunk Road (A363 Junction, Bathford to A342 Junction, Pewsham) (Detrunking) Order 1977. The Applicant is requested to provide evidence to National Highways indicating its source for including National Highways in the Book of Reference for this parcel. Wiltshire Council are the highway authority for this part of Bath Road, A4, and since National Highways are not the highway authority for Bath Road, A4, we do not	National Highways were originally identified as the freeholder for plot 13-016 because the registered title covering this land is held by the Secretary of State for Transport, and interests arising from such titles were historically attributed to National Highways following the transfer of titles within the Infrastructure Act 2015. In light of the clarification received from National Highways, the Applicant will update the Book of Reference at the next deadline to remove National Highways from the listed interests for this plot.

			have any comments in relation to the temporary possession of this plot.	
NH-042	Transport and Access	Purpose 1, 2, and 3 set out in Page 7 and 8 on the National Highways Submission	Plot: 20-001 Owner: National Highways Acquisition Category: Temporary Possession Works Proposed: Purpose 3 National Highways Comment: Whilst the Book of Reference notes that National Highways is the Owner or reputed owner and the Occupier of this plot, National Highways' investigations indicate that this road has now been detrunked and has been transferred to the LHA, following the detrunking order; The Bath-Lincoln Trunk Road (Tormarton Junction (M4) to Gloucestershire County Boundary) (Detrunking) Order 1978. The Applicant is requested to provide evidence to National Highways indicating its source for including National Highways in the Book of Reference for this parcel. South Gloucestershire Council are the highway authority for this part of Bath Road, A4. Since National Highways are not the highway authority for Bath	National Highways were originally identified as the freeholder for plot 20-001 because the registered title covering this land lists National Highways Limited as the owner. In light of the clarification received from National Highways, the Applicant will update the Book of Reference at Deadline 1 to remove National Highways from the listed interests for this plot.

			Road, A4, we do not have any comments in relation to the temporary possession of this plot.	
NH-043	Transport and Access	Purpose 1, 2, and 3 set out in Page 7 and 8 on the National Highways Submission	Plot: 20-002 Owner: National Highways, South Gloucestershire Council Acquisition Category: Temporary Possession Works Proposed: Purpose 3 National Highways Comment: Whilst the Book of Reference notes that National Highways is the Owner or reputed owner and the Occupier of this plot, National Highways' investigations indicate that this road has now been detrunked and has been transferred to the LHA, following the detrunking order; The Bath-Lincoln Trunk Road (Tormarton Junction (M4) to Gloucestershire County Boundary) (Detrunking) Order 1978. The Applicant is requested to provide evidence to National Highways indicating its source for including National Highways in the Book of Reference for this parcel. South Gloucestershire Council are the highway authority for this part of Bath Road, A4. Since National Hiahwavs are	National Highways were originally identified as the freeholder for plot 20-002 because the registered title covering this land lists National Highways Limited as the owner. In light of the clarification received from National Highways, the Applicant will update the Book of Reference at the next deadline to remove National Highways from the listed interests for this plot.

			not the hiahwav authoritv for Bath Road, A4, we do not have any comments in relation to the temporary possession of this plot	
NH-044	Transport and Access	Purpose 1, 2, and 3 set out in Page 7 and 8 on the National Highways Submission	Plot: 20-003 Owner: National Highways, South Gloucestershire Council, Unknown Acquisition Category: Temporary Possession Works Proposed: Purpose 3 National Highways Comment: Whilst the Book of Reference notes that National Highways is the Owner or reputed owner and the Occupier of this plot, National Highways' investigations indicate that this road has now been detrunked and has been transferred to the LHA, following the detrunking order; The Bath-Lincoln Trunk Road (Tormarton Junction (M4) to Gloucestershire County Boundary) (Detrunking) Order 1978. The Applicant is requested to provide evidence to National Highways indicating its source for including National Highways in the Book of Reference for this parcel. South Gloucestershire Council are the highway authority for this part of Bath Road, A4. Since National Highways are	National Highways were identified in plot 20-003 on the basis of assumed ad medium filum rights, given the plot's unregistered status and its proximity to land held by National Highways. In light of the clarification received from National Highways, the Applicant will update the Book of Reference at Deadline 1 to remove National Highways from the listed interests for this plot.

			not the highway authority for Bath Road, A4, we do not have any comments in relation to the temporary possession of this plot.	
NH-045	Transport and Access	Purpose 1, 2, and 3 set out in Page 7 and 8 on the National Highways Submission	Plot: 21-004 Owner: National Highways, South Gloucestershire Council, unknown Acquisition Category: Temporary Possession Works Proposed: Purpose 3 National Highways Comment: The Book of Reference notes that National Highways is an owner or reputed owner and occupier. National Highways' investigations indicate that the parcel is part of a Side Roads Order for the M4 Road Scheme. As the land appears to be part of a SRO, the only interest National Highways has in the land is the subsoil beneath the highway. South Gloucestershire are the highway authority for Acton Turville Road. National Highways are not the highway authority for Acton Turville Road, however, given its interest in the subsoil and the proximity of the parcel to National Highways' network (J18 of the M4), National Highways require further details of the works proposed on this	National Highways are currently captured as a reputed freeholder in plot 21-004 given the plot's unregistered status and its proximity to land titled to National Highways. In light of the clarification received from National Highways, the Applicant will update the Book of Reference at Deadline 1 to change National Highways to an ad medium filum interest, and amend the local authority to Highways authority interests. The proposed traffic management for the Scheme is out within **Outline Construction Traffic Management Plan (CTMP) [APP-287]**. The preparation, approval and implementation of the detailed CTMP, substantially in accordance with the outline plan, are secured through requirements in Schedule 2 of the **Draft Development Consent Order [APP-016]**.

			parcel. If there are any potential traffic management implications, then National Highways require to be consulted before works take place. The Applicant should be required to obtain National Highways' consent in the event the activities affect the SRN or any land National Highways has an interest in. As a public body, National Highways' is under a duty to act reasonably in providing such consent and this is expressly provided in paragraph 7(4) of National Highways' proposed protective provisions at Appendix 1.	As noted previously, the Applicant is progressing discussions with National Highways in respect of the form of Protective Provisions to be contained within the **draft Development Consent Order [APP-016].**
NH-046	Transport and Access	Purpose 1, 2, and 3 set out in Page 7 and 8 on the National Highways Submission	Plot: 21-005 Owner: National Highways, South Gloucestershire Council, Unknown Acquisition Category: Temporary Possession Works Proposed: Purpose 3 National Highways Comment: The Book of Reference notes that National Highways are a Category 1 person in relation to the subsoil beneath the public highway National Highways' investigations indicate that the parcel is part of a Side Roads Order for the M4 Road Scheme. As the land appears to be part of a SRO, the only interest National Highways has in the land is the subsoil beneath the highway. South Gloucestershire are the highway authority for Acton Turville Road. National Highways are not the highway authority for Acton Turville Road, however, given its interest in the subsoil and the proximity of the parcel to National Highways' network (J18 of the M4), National Highways require further	National Highways were originally identified as the freeholder for plot 20-007 because the registered title covering this land lists National Highways Limited as the owner. In light of the clarification received from National Highways, the Applicant will update the Book of Reference at the next deadline to include the local highway authority whilst retaining National Highways as a subsoil interest. The proposed traffic management for the Scheme is out within **Outline Construction Traffic Management Plan (CTMP) [APP-287]**. The preparation, approval and implementation of the detailed CTMP, substantially in accordance with the outline plan, are secured through requirements in Schedule 2 of the **Draft Development Consent Order [APP-016]**.

			details of the works proposed on this parcel. If there are any potential traffic management implications, then National Highways require to be consulted before works take place. The Applicant should be required to obtain National Highways' consent in the event the activities affect the SRN or any land National Highways has an interest in. As a public body, National Highways' is under a duty to act reasonably in providing such consent and this is expressly provided in paragraph 7(4) of National Highways' proposed protective provisions at Appendix 1.	As noted previously, the Applicant is progressing discussions with National Highways in respect of the form of Protective Provisions to be contained within the **draft Development Consent Order [APP-016].**
NH-047	Transport and Access	Purpose 1, 2, and 3 set out in Page 7 and 8 on the National Highways Submission	Plot: 21-006 Owner: National Highways, South Gloucestershire Council Acquisition Category: Temporary Possession Works Proposed: Purpose 3 National Highways Comment: The Book of Reference notes that National Highways is an owner or reputed owner and occupier. National Highways' investigations indicate that the parcel is part of a Side Roads Order for the M4 Road Scheme. As the land appears to be part of a SRO, the only interest National Highways has in the land is the subsoil beneath the highway. South Gloucestershire are the highway authority for Acton Turville Road. National Highways are not the highway authority for Acton Turville Road, however, given its interest in the subsoil and the proximity of the parcel to National Highways' network (J18 of the M4), National Highways require further	National Highways are currently captured as a freehold occupier in plot 21-006, with Gloucester Council listed as Highways authority. For the purposes of this Book of Reference, where a road is registered the owner is captured within the Owner or Reputed owner, and Occupier columns without a land qualifier stating subsoil as the title relates to the whole of the land. By capturing the Local Highways authority within this plot in the Book of Reference, this indicates the surface and operational highway is managed separately. The proposed traffic management for the Scheme is out within **Outline Construction Traffic Management Plan (CTMP) [APP-287]**. The preparation, approval and implementation of the detailed CTMP, substantially in accordance with the outline plan, are secured through

			details of the works proposed on this parcel. If there are any potential traffic management implications, then National Highways require to be consulted before works take place. The Applicant should be required to obtain National Highways' consent in the event the activities affect the SRN or any land National Highways has an interest in. As a public body, National Highways' is under a duty to act reasonably in providing such consent and this is expressly provided in paragraph 7(4) of National Highways' proposed protective provisions at Appendix 1.	requirements in Schedule 2 of the **Draft Development Consent Order [APP-016]**. As noted previously, the Applicant is progressing discussions with National Highways in respect of the form of Protective Provisions to be contained within the **draft Development Consent Order [APP-016].**
NH-048	Transport and Access	Purpose 1, 2, and 3 set out in Page 7 and 8 on the National Highways Submission	Plot: 21-007 Owner: National Highways Acquisition Category: Temporary Possession Works Proposed: Purpose 3 National Highways Comment: The Book of Reference notes that National Highways is an owner or reputed owner and occupier. National Highways' investigations indicate that the parcel is part of a Side Roads Order for the M4 Road Scheme. As the land appears to be part of a SRO, the only interest National Highways has in the land is the subsoil beneath the highway. South Gloucestershire are the highway authority for Acton Turville Road. National Highways are not the highway authority for Acton Turville Road, however, given its interest in the subsoil and the proximity of the parcel to	National Highways were originally identified as the freeholder for plot 20-007 because the registered title covering this land lists National Highways Limited as the owner. In light of the clarification received from National Highways, the Applicant will update the Book of Reference at the next deadline to include the local highway authority whilst retaining National Highways as a subsoil interest. The proposed traffic management for the Scheme is out within Outline Construction **Traffic Management Plan (CTMP) [APP-287]**. The preparation, approval and implementation of the detailed CTMP, substantially in accordance with the outline plan, are secured through requirements in

			National Highways' network (J18 of the M4), National Highways require further details of the works proposed on this parcel. If there are any potential traffic management implications, then National Highways require to be consulted before works take place. The Applicant should be required to obtain National Highways' consent in the event the activities affect the SRN or any land National Highways has an interest in. As a public body, National Highways' is under a duty to act reasonably in providing such consent and this is expressly provided in paragraph 7(4) of National Highways' proposed protective provisions at Appendix 1.	Schedule 2 of the **Draft Development Consent Order [APP-016]**. As noted previously, the Applicant is progressing discussions with National Highways in respect of the form of Protective Provisions to be contained within the **draft Development Consent Order [APP-016].**
NH-049	Transport and Access	Purpose 1, 2, and 3 set out in Page 7 and 8 on the National Highways Submission	Plot: 13-003 Owner: National Highways (in respect of rights granted as contained in a Conveyance dated 14 February 1958) Acquisition Category: Potential claim under S10 Compulsory Purchase Act 1965, Part 1 Land Compensation Act 1973 or 152 (3) of the Planning Act2008 Works Proposed: Purpose 2 National Highways Comment: Insufficient information has been provided at this stage to enable National Highways to assess the impact of the development on the rights it enjoys in the conveyance. Please provide a copy of the conveyance. It is noted that the plot is required for works Sa. National Highways require additional information about the works proposed and the nature of existing	The Applicant acknowledges the comments made and the Applicant will actively engage with the respondent to reach an amicable solution. Updates of which will be captured in the **Land and Rights Negotiations Tracker [APP-021]**. A description of the Scheme is presented in **ES Volume 1, Chapter 3: The Scheme [APP-055]**, with additional detail on the cable route presented in **Appendix 3-1: Cable Route Construction Method Statement [APP-183]**. As noted previously, the Applicant is progressing discussions with National Highways in respect of the form of Protective Provisions to be contained

			rights in order to understand the subject of any claim.	within the **draft Development Consent Order [APP-016].**
NH-050	Transport and Access	Purpose 1, 2, and 3 set out in Page 7 and 8 on the National Highways Submission	Plot: 09-018 Owner: National Highways (in respect of drainage and gully apparatus) Acquisition Category: National Highways enjoys either an easement over the land or a private right, but where pursuant to the DCO it is proposed the plot will be extinguished, suspended or interfered with so as to then affect the easement or private right Works Proposed: Purpose 2 National Highways Comment: Insufficient information has been provided at this stage to enable National Highways to assess the impact of the development on the rights in respect of drainage and gully apparatus it enjoys. It is noted that the plot is required for works Sa. National Highways require additional information about the works proposed and the	The Applicant acknowledges the comments made and the Applicant will actively engage with the respondent to reach an amicable solution. Updates of which will be captured in **the Land and Rights Negotiations Tracker [APP-021].** A description of the Scheme is presented in **ES Volume 1, Chapter 3: The Scheme [APP-055]**, with additional detail on the cable route presented in **Appendix 3-1: Cable Route Construction Method Statement [APP-183]**. As noted previously, the Applicant is progressing discussions with National Highways in respect of the form of Protective Provisions to be contained

			nature of existing rights in order to understand the impact of the development on these rights.	within the **draft Development Consent Order [APP-016].**
NH-051	Transport and Access	Purpose 1, 2, and 3 set out in Page 7 and 8 on the National Highways Submission	Plot: 09-020 Owner: National Highways (in respect of drainage and gully apparatus) Acquisition Category: National Highways enjoys either an easement over the land or a private right, but where pursuant to the DCO it is proposed the plot will be extinguished, suspended or interfered with so as to then affect the easement or private right Works Proposed: Purpose 2 National Highways Comment: Insufficient information has been provided at this stage to enable National Highways to assess the impact of the development on the rights in respect of drainage and gully apparatus it enjoys. It is noted that the plot is required for works Sa. National Highways require additional information	The Applicant acknowledges the comments made and the Applicant will actively engage with the respondent to reach an amicable solution. Updates of which will be captured in the **Land and Rights Negotiations Tracker [APP-021]**. A description of the Scheme is presented in **ES Volume 1, Chapter 3: The Scheme [APP-055]**, with additional detail on the cable route presented in **Appendix 3-1: Cable Route Construction Method Statement [APP-183]**. As noted previously, the Applicant is progressing discussions with National Highways in respect of the form of Protective Provisions to be contained

			about the works proposed and the nature of existing rights in order to understand the impact of the development on these rights.	within the **draft Development Consent Order [APP-016].**
NH-052	Transport and Access	Purpose 1, 2, and 3 set out in Page 7 and 8 on the National Highways Submission	Plot: 09-021 Owner: National Highways (in respect of drainage and gully apparatus) Acquisition Category: National Highways enjoys either an easement over the land or a private right, but where pursuant to the DCO it is proposed the plot will be extinguished, suspended or interfered with so as to then affect Works Proposed: Purpose 2 National Highways Comment: Insufficient information has been provided at this stage to enable National Highways to assess the impact of the development on the rights in respect of drainage and gully apparatus it enjoys. It is noted that the plot is required for works Sa. National Highways require additional information about the works proposed and the nature of existing rights in order to understand the impact of the development on these rights.	The Applicant acknowledges the comments made and the Applicant will actively engage with the respondent to reach an amicable solution. Updates of which will be captured in the **Land and Rights Negotiations Tracker [APP-021]**. A description of the Scheme is presented in **ES Volume 1, Chapter 3: The Scheme [APP-055]**, with additional detail on the cable route presented in **Appendix 3-1: Cable Route Construction Method Statement [APP-183]**. As noted previously, the Applicant is progressing discussions with National Highways in respect of the form of Protective Provisions to be contained within the **draft Development Consent Order [APP-016].**

NH-053	Transport and Access	Purpose 1, 2, and 3 set out in Page 7 and 8 on the National Highways Submission	Plot: 13-003 Owner: National Highways (in respect of rights granted as contained in a Conveyance dated 14 February 1958) Acquisition Category: National Highways enjoys either an easement over the land or a private right, but where pursuant to the DCO it is proposed the plot will be extinguished, suspended or interfered with so as to then affect the easement or private right Works Proposed: Purpose 2 National Highways Comment: Insufficient information has been provided at this stage to enable National Highways to assess the impact of the development on the rights it enjoys in the conveyance. Please provide a copy of the conveyance. It is noted that the plot is required for works Sa. National Highways require additional information about the works proposed and the nature of existing rights in order to understand the impact of the development on these rights.	The Applicant acknowledges the comments made and the Applicant will actively engage with the respondent to reach an amicable solution. Updates of which will be captured in the **Land and Rights Negotiations Tracker [APP-021]**. A description of the Scheme is presented in **ES Volume 1, Chapter 3: The Scheme [APP-055]**, with additional detail on the cable route presented in **Appendix 3-1: Cable Route Construction Method Statement [APP-183]**. As noted previously, the Applicant is progressing discussions with National Highways in respect of the form of Protective Provisions to be contained within the **draft Development Consent Order [APP-016].**
NH-054	Transport and Access	Draft DCO	6 Draft DCO 6.1 Whilst the protective provisions included in the Applicant's draft DCO for National Highways' benefit, include some protections for National Highways, concerns remain in relation to some of the articles. The form of protective provisions at Appendix 1 addresses those concerns. The Applicant's draft DCO includes the following provisions which are of specific concern to National Highways	The Applicant notes this comment. As stated previously, the Protected Provisions included at Part 5 of Schedule 15 (given effect by Article 45 (Protective Provisions)) to the **draft Development Consent Order [APP-016]** are draft Protective Provisions. The Applicant is currently progressing discussions with National Highways in respect of bespoke Protective Provisions for the benefit of National Highways.

NH-055	Transport and Access	Article 8 (Street Works)	Article/Schedule:Article 8 (Street Works) Summary of the Applicant's drafting The undertaker may, for the purposes of the authorised development, enter on so much of any of the streets specified in Schedule 4 (streets subject to street works) and may: (a) break up or open the street, or any sewer, drain or tunnel under it; (b) drill, tunnel or bore under the street; (c) place and keep apparatus in or under the street; (d) maintain apparatus in or under the street, change its position or remove it; (e) repair, replace or otherwise alter the surface or structure of the street or any culvert under the street; and (f) execute any works required for or incidental to any works referred to in sub-paragraphs (a) to (e). National Highways comments: This article gives the Applicant the power to break open the streets, place and keep apparatus in or under the street etc to those streets referred to at Schedule 4. Schedule 4 includes the M4 which forms part of the strategic network that National Highways is responsible for at the following locations marked on the Streets Plan (APP-008): Points 9i and 9j This article will give the Applicant the power to break open the streets, place and keep apparatus etc. beneath the M4. To date, no information has been received by National Highways other	As noted previously, the Applicant is progressing discussions with National Highways in respect of the form of Protective Provisions to be contained within the **draft Development Consent Order [APP-016].**

			than the location of the apparatus, so the nature and scope of the proposed works remains unclear. Please refer to paragraph 4.2 - 4.6 for the information National Highways require in order to address National Highways' concern relating to this article. Additionally, please note it is National Highways' preference that any apparatus installed under the strategic road network is carried out by Horizontal Directional Drilling (HOD) rather than an open cut method. It is noted that the Applicant's protective provisions for the benefit of National Highways to the draft order requires National Highways' approval to the design before works under this article commence at paragraph 53(2) however this does not extend to approval of the programme for the cable works. The protective provisions contained in the draft DCO are not agreed by National Highways. A copy of National Highways' proposed protective provision are attached to this representation at Appendix 1. As the highway authority for the M4, National Highways must have control over the operations being carried out on and under its network in order to comply with its duty to co-ordinate the execution of works of all kinds (including works for road purposes) under section 59 of the New Roads and Street Act 1991. Road space booking will be required in connection with these works so National Highways can comply with this duty. This is critical	

			from a safety perspective and to protect the structure of the street and the integrity of apparatus in it. Therefore, the Applicant should be required to obtain National Highways' consent in the event the activities effect the strategic road network or any land National Highways has an interest in. As a public body, National Highways is under a duty to act reasonably in providing such consent and this is expressly provided in paragraph 7(4) of National Highways' proposed protective provisions at Appendix 1. Inclusion of paragraph 7(2) of National Highways' proposed protective provisions would address National Highways' objection to this article, which requires the Applicant to obtain National Highways consent before exercising their right under this article. Such consent should not be subject to deemed consent under article 47. Please see comments in this regard below.	
NH-056	Transport and Access	Article 10	Article/Schedule: Article 10 (Power t0 alter layout etc of streets). Summary of the Applicant's drafting: (1) The undertaker may for the purposes of the authorised development alter the layout of, and carry out the works to the streets (a) specified in column 2 of the table in Part 1 (permanent alteration of layout) of Schedule 5 (alteration of streets) permanently in the manner specified in	As noted previously, the Applicant is progressing discussions with National Highways in respect of the form of Protective Provisions to be contained within the **draft Development Consent Order [APP-016].**

			relation to that street in column 3; and (b) specified in column 2 of the table in Part 2 (temporary alteration of layout) of Schedule 5 temporarily in the manner specified in relation to that street in column 3. (2) Without prejudice to the specific powers conferred by paragraph (1), but subject to paragraphs (3) and (4), the undertaker may, for the purposes of constructing, operating or maintaining the authorised development, alter the layout of any street and, without limitation on the scope of this paragraph, the undertaker may- (a) alter the level or increase the width of any kerb, footway, cycle track or verge; and b) make and maintain passing places. c) alter, remove, replace or relocate any street furniture, including but without limitation any bollards, lighting columns or street signs (3) The undertaker must restore any street that has been temporarily altered under this Order to the reasonable satisfaction of the street authority (4) The powers conferred by paragraph (2) may not be exercised without the consent of the street authority, such consent to be in a form reasonably required by the street authority National Highways Comments: The Applicant has the power to temporarily alter the layout and carry out works to the streets specified in column 2 of the table in Part 2 of Schedule 5. National Highways has no interest in the streets specified in	

			Schedule 5. However, it is noted that there are non street specific powers in subsection (2). The Applicant must obtain National Highways' prior approval for works undertaken under this article in connection with the SRN at paragraph 53(2) of National Highways' protective provisions of the applicant's draft DCO. However, such consent should not be subject to deemed consent under article 47. Please see comments in this regard below.	

NH-057	Transport and Access	Article 11	Article/Schedule: Article 11 (Construction and maintenance of altered streets) Summary of the Applicant's Drafting: Where streets are altered under the powers conferred by article 10, the street must be completed to the reasonable satisfaction of the street authority and unless otherwise agreed with the street authority be maintained by and at the expense of the undertaker for 12 months from completion and by the street authority from the expiry of that 12 month period. In any action against the undertaker in respect of loss or damage resulting from any failure by it to maintain a street under this article, it is a defence to prove that the undertaker had taken such care as in all the circumstances was reasonably required to secure that the part of the street to which the action relates was not dangerous to traffic. The article sets out what the court must have regard to for the purposes of a defence and states that it is not relevant that the undertaker had arranged for a competent person to carry out or supervise the maintenance of that part of the street to which the action relates unless it is also proved that the undertaker had given that person proper instructions with regard to the maintenance of the street and that those instructions had been carried out National Highways Comments: Article 11 is not acceptable and should exclude the SRN. National Highways do not agree to deemed adoption and	As noted previously, the Applicant is progressing discussions with National Highways in respect of the form of Protective Provisions to be contained within the **draft Development Consent Order [APP-016].**

			the Applicant would need to comply with the adoption and maintenance provisions included in National Highways' standard proposed protective provisions. The undertaker should not be able to absolve itself from responsibility in the way proposed by the article. Inclusion of paragraph 7(7) of National Highways proposed protective provisions at Appendix 1 would address National Highways concerns which would seek to disapply article 11 in the context of any powers relating to the strategic road network.	

NH-058	Transport and Access	Article 12	Article/Schedule: Article 12 (Temporary closure, restriction or prohibition of use of streets and public rights of way) Summary of the Applicant's Drafting: (1) The undertaker, during and for the purposes of constructing, maintaining or decommissioning the authorised development, may temporarily close, prohibit the use of, restrict the use of, alter or divert any street or public right of way and may for any reasonable time- (a) divert the traffic or a class of traffic from the street or public right of way; (b) authorise the use of motor vehicles on classes of public rights of way where, notwithstanding the provisions of this article, there is otherwise no public right to use motor vehicles; and (c) subject to paragraph (2), prevent all persons from passing along the street or public right of way. (3) Without prejudice to the generality of paragraph (1), the undertaker may temporarily close, prohibit the use of, restrict the use of, authorise the use of, alter or divert- (a) the streets specified in column 2 of the table in Part 1 (streets to be temporarily closed) of Schedule 6 (streets and public rights of way) to the extent specified in column 3 of that table; (b) the public rights of way specified in column 2 of the table in Part 2 (public rights of way to be temporarily closed) of Schedule 6 to the extent specified in column 3 of that table; and (c) the public rights of way specified in column 2 of the table in Part 3	As noted previously, the Applicant is progressing discussions with National Highways in respect of the form of Protective Provisions to be contained within the **draft Development Consent Order [APP-016].**

			(temporary use of motor vehicles on public rights of way) of Schedule 6 to the extent specified in column 3 of that table. (d) the public rights of way specified in column 2 of the table in Part 4 (temporary use of motor vehicles on public rights of way) of Schedule 6 to the extent specified in column 3 of that table (4) The undertaker must not temporarily close, prohibit the use of, restrict the use of, authorise the use of, alter or divert- (a) any street or public right of way specified in paragraph (3) without first consulting the street authority; and (b) any other street or public right of way without the consent of the street authority, and the street authority may attach reasonable conditions to any such consent. National Highways Comments: This article provides the Applicant with powers equivalent to a temporary traffic regulation order in connection with any road. National Highways has no interest in the streets or public rights of way listed in Schedule 6 however it is noted that subsection 1 contains a general power that may affect National Highways' interests. The Applicant is required to consult with National Highways in this regard but they do not require our consent. National Highways must have control over the operations being carried out on its network. This is critical from a safety perspective and to maintain the integrity	

			of the asset. Therefore, the Applicant should be required to obtain National Highways' consent in the event the activities effect the SRN or any land National Highways has an interest in. As a public body, National Highways is under a duty to act reasonably in providing such consent and this is expressly provided in paragraph 7(4) of National Highways' proposed protective provisions at Appendix 1. Inclusion of paragraph 7(2) of National Highways' proposed protective provisions would address National Highways objection to this article, which requires the Applicant to obtain National Highways consent before exercising their right under this article.	

NH-059	Transport and Access	Article 16	Article/Schedule: Article 16 (Traffic regulation measures) Summary of the Applicant's Drafting: (1) Subject to the provisions of this article, the undertaker may make temporary provision for the purposes of the construction, maintenance and decommissioning of the authorised development- (a) as to the speed at which vehicles may proceed along any road; (b) permitting, prohibiting or restricting the stopping, waiting, loading or unloading of vehicles on any road; (c) as to the prescribed routes for vehicular traffic or the direction or priority of vehicular traffic on any road; (d) permitting, prohibiting or restricting the use by vehicular traffic or non-vehicular traffic of any road; and (e) suspending or amending in whole or in part any order made, or having effect as if made, under the 1984 Act. (2) Subject to the provisions of this article the undertaker may at any time, in the interests of safety and for the purposes of, or in connection with, the construction of the authorised development, temporarily place traffic signs and signals in the extents specified in column 3 of road specified in column 2 of the table in Schedule 8 (traffic regulation measures) and over which temporary provision has been made under paragraph (1) and the placing of those traffic signs and signals is deemed to have been permitted by the traffic authority for the purposes of section 65 of the 1984 Act and the Traffic Signs Regulations and General	As noted previously, the Applicant is progressing discussions with National Highways in respect of the form of Protective Provisions to be contained within the **draft Development Consent Order [APP-016].**

			Directions 2016(a). National Highways Comments: This article provides the Applicant with powers equivalent to a temporary traffic regulation order in connection with any road. It is noted that National Highways do not have an interest in the roads specified in Schedule 8 but subsection 1 contains a wider power which may effect National Highways' interests. It is noted consent is required from the traffic authority before exercising those powers however such consent should not be subject to deemed consent under article 47. Please see comments in this regard below. The draft order allows the Applicant to exercise their powers at article 16(1) without the consent of National Highways and provides the Applicant with deemed approval under section 65 1984 Act. National Highways must have control over the placing of signage on its network. This is critical from a safety perspective and to maintain the integrity of the asset. National Highways will require details of any proposed signage and must review and approve the proposed signage. Full details, including the dimensions of the signs, must be submitted for approval. All signage must be designed in accordance with the Department for Transport's requirements, as outlined in the Traffic Signs Manual Chapter 8, and must also comply with the Design Manual for Roads and Bridges (DMRB). The Applicant should be required to obtain National Highways' consent for	

			any signage on the SRN to ensure these standards are met and to protect the safety of the road users. As a public body, National Highways is under a duty to act reasonably in providing such consent and this is expressly provided in paragraph 7(4) of National Highways' proposed protective provisions at Appendix 1. Inclusion of paragraph 7(2) of National Highways' proposed protective provisions would address National Highways objection to this article in relation to signage being permitted under section 65 of the 1984. This requires the Applicant to obtain National Highways' consent before exercising their right under this article. In addition, National Highways seek clarity from the application on the reasons wording is sought that any signage would be deemed to comply with the Traffic Signs Regulations and General Directions 2016. This is a set of directions that governs the design of signage which all signage on the SRN should comply with.	

NH-060	Transport and Access	Article 17	Article/Schedule: Article 17 (Discharge of water) Summary of the Applicant's Drafting: (1) Subject to paragraphs (3), (4) and (7) the undertaker may use any watercourse or any public sewer or drain for the drainage of water in connection with the construction or maintenance or decommissioning of the authorised development and for that purpose may lay down, take up and alter pipes and may, on any land within the Order limits, make openings into, and connections with, the watercourse, public sewer or drain. 3) The undertaker must not discharge any water into any watercourse, public sewer or drain except with the consent of the person to whom it belongs whose consent may be given subject to terms and conditions as that person may reasonably impose. National Highways Comments: This article allows the Applicant to use any watercourse, public sewer or drain for the drainage of water in connection with the authorised development. It is unclear whether or not this article applies to National Highways' drainage system as drafted or whether this applies to public drains only. National Highways' drainage system is not a public drain. Please can the Applicant confirm if the intention is for this article to apply to National Highways' drains. If it is the intention for this article to apply to National Highways drains, National Highways do have concerns in this regard. It is noted consent is required	As noted previously, the Applicant is progressing discussions with National Highways in respect of the form of Protective Provisions to be contained within the **draft Development Consent Order [APP-016].**

			from the person to whom the watercourse, drain or sewer belongs however such consent is subject to deemed consent under article 47. Please see comments in this regard below. National Highways is concerned this provision potentially allows the Applicant to make use of highway drainage infrastructure for the benefit of their authorised development. Paragraph 59 of the Oft Circular 01/2022 which contacts government guidelines National Highways are required to comply with, sets out the following: 59. To ensure the integrity of the highway drainage systems, no new connections into those systems from third party development and proposed drainage schemes will be accepted. Where there is already an existing informal or formal connection into the highway drainage system from a proposed development site, the right for a connection may be allowed to continue provided that the flow, rate and quality of the discharge into the highway drainage system remains unaltered or results in a betterment. The company may require a drainage management and maintenance agreement to be entered into to secure this requirement in perpetuity. These provisions require consent to be obtained from the relevant highway authority before water can be discharged into the highway drainage system. As such, measures should be put in place so that such consent or refusal can be provided. Inclusion of paragraph 7(2) of National Highways'	

			proposed protective provisions at Appendix 1 would address National Highways objection to this article, which requires the Applicant to obtain National Highways consent before exercising their right under this article. As a public body, National Highways is under a duty to act reasonably in providing such consent and this is expressly provided in paragraph 7(4) of National Highways' proposed protective provisions.	

NH-061	Transport and Access	Article 19	Article/Schedule: Article 19 (Protective works to buildings) Summary of the Applicant's Drafting: (4) For the purpose of carrying out protective works under this article to a building, the undertaker may (subject to paragraphs (5) and (6))- (a) enter the building and any land within its curtilage; and (b) where the works cannot be carried out reasonably conveniently without entering land which is adjacent to the building but outside its curtilage, enter the adjacent land (whether or not such adjacent land is inside or outside the Order limits) but not any building erected on it. National Highways Comments: This article provides the Applicant with the power to carry out protective works to any building within the order limits. Whilst National Highways does not have any buildings within the order limits, it does have concern in relation to sub-paragraph 4 of this article, which provides the Applicant with the power to enter land which is adjacent to the building to carry out the protective works. The said land may form part of the SRN or land National Highways has an interest in. The article does not require the Applicant to obtain consent from the landowner but merely obtain their consent. National Highways must have control over the operations being carried out on its network and land it has an interest in. This is critical from a safety perspective and to maintain the integrity of the asset. Therefore, the	As noted previously, the Applicant is progressing discussions with National Highways in respect of the form of Protective Provisions to be contained within the **draft Development Consent Order [APP-016].**

			Applicant should be required to obtain National Highways' consent in the event any access or works under this article effect the SRN or any land National Highways has an interest in. National Highways must ensure the safety of its road users and provide prior to approval to those accessing its network. As a public body, National Highways is under a duty to act reasonably in providing such consent and this is expressly provided in paragraph 7(4) of National Highways' proposed protective provisions at Appendix 1. Inclusion of paragraph 7(2) of National Highways' proposed protective provisions would address National Highways objection to this article, which requires the Applicant to obtain National Highways consent before exercising their right under this article. Such consent should not be subject to deemed consent under article 47. Please see comments in this regard below.	

NH-062	Transport and Access	Article 20	Article/Schedule: Article 20 (Authority to survey and investigate land) Summary of the Applicant's Drafting: (1) The undertaker may for the purposes of this Order enter on any land shown within the Order limits or enter on any land which may be affected by the authorised development or enter on any land upon which entry is required in order to carry out monitoring or surveys in respect of the authorised development and- (a) survey or investigate the land; (b) without prejudice to the generality of sub-paragraph (a), make trial holes or boreholes in such positions on the land as the undertaker thinks fit to investigate the nature of the surface layer and subsoil and groundwater and remove soil and groundwater samples (c) without prejudice to the generality of sub-paragraph (a), carry out ecological or archaeological investigations on such land, including the digging of trenches; and (d) place on, leave on and remove from the land apparatus for use in connection with the survey and investigation of land and making of trial holes, boreholes or trenches National Highways Comments: This article allows the Applicant to enter any land within the order limits effected by the authorised development or enter on any land upon which entry is required in order to carry out monitor or survey in respect of the authorised development and carry out surveys or investigations, trial holes, bore holes,	As noted previously, the Applicant is progressing discussions with National Highways in respect of the form of Protective Provisions to be contained within the **draft Development Consent Order [APP-016].**

			ecological or archaeological investigations and place leave or remove apparatus on land in this regard. Whilst it is noted consent is required from the highway authority at sub paragraph 4 for any trial holes, bore holes and trenches for land located within the highway boundary, consent is not required for the wider use of the powers granted within this article such as access to land for surveys etc. Consent is also not required for any land National Highways own that is outside of the highway boundary and the Applicant is only required to serve notice on the landowner prior to exercising this right. This is also a right that extends beyond the order limits. National Highways must have control over the operations being carried out on its network and land it has an interest in. This is critical from a safety perspective and to maintain the integrity of the asset. Therefore, the Applicant should be required to obtain National Highways' consent in the event any access or works under this article effect the SRN or any land National Highways has an interest in. National Highways must ensure the safety of its road users and provide prior to approval to those accessing its network. As a public body, National Highways is under a duty to act reasonably in providing such consent and this is expressly provided in paragraph 7(4) of National Highways' proposed protective provisions at Appendix 1.	

NH-063	Transport and Access	Article 21	Article/Schedule: Article 21 (Compulsory acquisition of land) Summary of the Applicant's Drafting: 1) The undertaker may- (a) acquire compulsorily so much of the Order land as is required for the authorised development or to facilitate, or as is incidental, to it; and (b) use any land so acquired for the purpose authorised by this Order or for any other purposes in connection with or ancillary to the authorised development. (2) This article is subject to article 22 (time limit for exercise of authority to possess land temporarily or to acquire land compulsorily), article 24 (compulsory acquisition of rights), article 31 (temporary use of land for constructing the authorised development) and article 49 (Crown rights). National Highways Comments: Given that the article enables the undertaker to acquire compulsorily so much of the Order land as is required for the authorised development etc and to use that land so acquired, if that included any part of NHs SRN, National Highways must have control over the operations being carried out on its network. This is critical from a safety perspective and to maintain the integrity of the asset. Therefore, the applicant should be required to obtain National Highways' consent in the event the activities effect the strategic road network or any land National Highways	As noted previously, the Applicant is progressing discussions with National Highways in respect of the form of Protective Provisions to be contained within the **draft Development Consent Order [APP-016].**

			has an interest in. As a public body, National Highways is under a duty to act reasonably in providing such consent and this is expressly provided in paragraph 7(4) of National Highways' proposed protective provisions at Appendix 1. Inclusion of paragraph 7(2) of National Highways' proposed protective provisions would address National Highways' objection to this article, which requires the applicant to obtain National Highways consent before exercising their right under this article.	

NH-064	Transport and Access	Article 25	Article/Schedule: Article 25 (Private rights) Summary of the Applicant's Drafting: Subject to the provisions of this article, all private rights and restrictive covenants over land subject to compulsory acquisition under this Order cease to have effect insofar as their continuance would be inconsistent with the exercise of the powers under article 21 (compulsory acquisition of land) on the earliest of- (a) the date of acquisition of the land by the undertaker, whether compulsorily or by agreement; or (b) the date of entry on the land by the undertaker under section 11(1) (power of entry) of the 1965 Act. National Highways Comments: Please see our comments above in relation to plot numbers 09-018, 09-019, 09-020, 09-021, 13-003. Subject to our enquiries in relation to the above mentioned plots, National Highways must have control over the operations being carried out on its network. This is critical from a safety perspective and to maintain the integrity of the asset. Therefore, the Applicant should be required to obtain National Highways' consent in the event the activities effect the strategic road network or any land National Highways has an interest in. As a public body, National Highways is under a duty to act reasonably in providing such consent and this is expressly provided in paragraph 7(4) of National Highways' proposed protective provisions at Appendix 1. Inclusion of	As noted previously, the Applicant is progressing discussions with National Highways in respect of the form of Protective Provisions to be contained within the **draft Development Consent Order [APP-016].**

			paragraph 7(2) of National Highways' proposed protective provisions would address National Highways' objection to this article, which requires the Applicant to obtain National Highways consent before exercising their right under this article.	

NH-065	Transport and Access	Article 27	Article/Schedule: Article 27 (Power to override easements and other rights) Summary of the Applicant's Drafting: Any authorised activity which takes place on land within the Order limits (whether the activity is undertaken by the undertaker or by any person deriving title from the undertaker or by any contractors, servants or agents of the undertaker) is authorised by this Order if it is done in accordance with the terms of this Order, notwithstanding that it involves- (a) an interference with an interest or right to which this article applies; or (b) a breach of a restriction as to the user of land arising by virtue of a contract. (2) The interests and rights to which this article applies include any easement, liberty, privilege, right or advantage annexed to land and adversely affecting other land, including any natural right to support and include restrictions as to the user of land arising by virtue of a contract. National Highways Comments: It seems this article permits the Applicant to interfere with any right or interest National Highways may have within the order limits. This raises a concern however it is not clear whether there will be a temporary interference or permanent extinguishment of National Highways' interests. Please can the Applicant confirm how this is going to apply relating to National Highways' interests. National Highways must have control over the operations being	As noted previously, the Applicant is progressing discussions with National Highways in respect of the form of Protective Provisions to be contained within the **draft Development Consent Order [APP-016].**

			carried out on its network. This is critical from a safety perspective and to maintain the integrity of the asset. Therefore, the Applicant should be required to obtain National Highways' consent in the event the activities affect the strategic road network or any land National Highways has an interest in. As a public body, National Highways is under a duty to act reasonably in providing such consent and this is expressly provided in paragraph 7(4) of National Highways' proposed protective provisions at Appendix 1. Inclusion of paragraph 7(2) of National Highways' proposed protective provisions would address National Highways' objection to this article, which requires the Applicant to obtain National Highways consent before exercising their right under this article.	

NH-066	Transport and Access	Article 29	Article/Schedule: Article 29 (Acquisition of subsoil only) Summary of the Applicant's Drafting: The undertaker may acquire compulsorily so much of, or such rights in, the subsoil of the Order Land, instead of acquiring or acquiring rights in the whole of the land. National Highways Comments: National Highways objects to the inclusion of the plots in the DCO and to Compulsory Powers for the acquisition of subsoil. National Highways must have control over the operations being carried out on its network. National Highways require control over the subsoil vested in it under the SRN. This is critical from a safety perspective and to maintain the integrity of the asset. Therefore, the Applicant should be required to obtain National Highways' consent in the event the activities affect the strategic road network or any land National Highways has an interest in. As a public body, National Highways is under a duty to act reasonably in providing such consent and this is expressly provided in paragraph 7(4) of National Highways' proposed protective provisions at Appendix 1. Inclusion of paragraph 7(2) of National Highways' proposed protective provisions would address National Highways' objection to this article, which requires the Applicant to obtain National Highways consent before exercising their right under this article.	As noted previously, the Applicant is progressing discussions with National Highways in respect of the form of Protective Provisions to be contained within the **draft Development Consent Order [APP-016].**

NH-067	Transport and Access	Article 30	Article/Schedule: Article 30 (Rights under or over streets) Summary of the Applicant's Drafting: The undertaker may enter on, appropriate and use so much of the subsoil of or airspace over any street within the Order limits as may may use the subsoil or airspace for those purposes or any other purpose ancillary to the authorised development. National Highways Comments: This article provides the Applicant with the power to enter and use the subsoil or airspace over any part of National Highways' network within the order limits without National Highways' consent. National Highways would not permit uncontrolled oversailing or works underneath its network which would originally have the protection of a section 50 pursuant to the New Roads and Street Works Act 1991. National Highways would need to give consideration to the safety implications of such work and its interface with National Highways' assets. National Highways would expect to have an approval role. National Highways must have control over the operations being carried on its network. National Highways require control over the subsoil vested in it and airspace over the SRN. This is critical from a safety perspective and to maintain the integrity of the asset. Therefore, the applicant should be required to obtain National Highways' consent in the event the activities effect the strategic road network or any land or airspace	As noted previously, the Applicant is progressing discussions with National Highways in respect of the form of Protective Provisions to be contained within the **draft Development Consent Order [APP-016].**

			National Highways has an interest in. As a public body, National Highways is under a duty to act reasonably in providing such consent and this is expressly provided in paragraph 7(4) of National Highways' proposed protective provisions at Appendix 1. Inclusion of paragraph 7(2) of National Highways' proposed protective provisions would address National Highways objection to this article, which requires the applicant to obtain National Highways consent before exercising their right under this article.	

NH-068	Transport and Access	Article 31	Article/Schedule: Article 31 (Temporary use of land for constructing the authorised development) Summary of the Applicant's Drafting: The undertaker may, in connection with the construction of the authorised development but subject to article 22 (time limit for exercise of authority to possess land temporarily or to acquire land compulsorily)- (a) enter on and take temporary possession of- (i) so much of the land specified in column (1) of the table in Schedule 11 (land of which temporary possession may be taken) for the purpose specified in relation to the land in column (2) of that table; and (ii) any other Order land in respect of which no notice of entry has been served under section 11(b) of the 1965 Act (powers of entry) and no declaration has been made under section 4(c) of the 1981 Act (execution of declaration); (b) remove any buildings, structures, agricultural plant and apparatus, electric lines, drainage, fences, debris and vegetation from that land; (c) construct temporary works (including means of access), haul roads, security fencing, bridges, structures and buildings on that land; (d) use the land for the purposes of a temporary working site with access to the working site in connection with the authorised development; (e) construct any works on that land as are mentioned in Schedule 1 (authorised development); and	As noted previously, the Applicant is progressing discussions with National Highways in respect of the form of Protective Provisions to be contained within the **draft Development Consent Order [APP-016].**

			(c) carry out mitigation works on that land required under the requirements in Schedule 2 (requirements). (2) Paragraph (1) does not authorise the undertaker to take temporary possession of- (a) any house or garden belonging to a house; or (b) any building (other than a house) if it is for the time being occupied. National Highways Comments: This article provides the Applicant with the power to take temporary possessions of the land referred to in schedule 11 and any other order land without the consent of National Highways. Schedule 11 does not include any land which National Highways have an operational interest in however, it is noted that the article also applies to other Order land. National Highways must have control over the operations being carried out on its network. This is critical from a safety perspective and to maintain the integrity of the asset. Therefore, the Applicant should be required to obtain National Highways' consent in the event the activities effect the strategic road network or any land National Highways has an interest in. As a public body, National Highways is under a duty to act reasonably in providing such consent and this is expressly provided in paragraph 7(4) of National Highways' proposed protective provisions at Appendix 1. Inclusion of paragraph 7(2) of National Highways' proposed protective provisions would address National Highways objection to this	

			article, which requires the Applicant to obtain National Highways consent before exercising their right under this article.	

NH-069	Transport and Access	Article 32	Article/Schedule: Article 32 (Temporary use of land for maintaining the authorised development) Summary of the Applicant's Drafting: The undertaker may, at any time during the maintenance period relating to any part of the authorised development- (a) enter on and take temporary possession of any land within the Order limits if such possession is reasonably required for the purpose of maintaining the authorised development; (b) enter on any land within the Order limits for the purpose of gaining such access as is reasonably required for the purpose of maintaining the authorised development; and (c) construct such temporary works (including the provision of means of access) and buildings on the land as may be reasonably necessary for that purpose. National Highways Comments: This article grants the Applicant with the right to take temporary possession of any land within the order limits without the consent of National Highways, during the maintenance period (period of five years beginning with the date of final commissioning of the part of the authorised development). National Highways must have control over the operations being carried out on its network. This is critical from a safety perspective and to maintain the integrity of the asset. Therefore, the Applicant should be required to obtain National Highways' consent in the event the activities effect the strategic road network or any land	As noted previously, the Applicant is progressing discussions with National Highways in respect of the form of Protective Provisions to be contained within the **draft Development Consent Order [APP-016].**

			National Highways has an interest in. As a public body, National Highways is under a duty to act reasonably in providing such consent and this is expressly provided in paragraph 7(4) of National Highways' proposed protective provisions at Appendix 1.Inclusion of paragraph 7(2) of National Highways' proposed protective provisions would address National Highways objection to this article, which requires the Applicant to obtain National Highways consent before exercising their right under this article.	

NH-070	Transport and Access	Article 33	Article/Schedule: Article 33 (statutory undertakers) Summary of the Applicant's Drafting: Subject to the protective provisions of Schedule 15 (Protective Provisions) the undertaker may - (a) Acquire compulsorily, or acquire new rights or impose restrictive covenants over, the land belonging to statutory undertakers shown on the land plan within the Order land; and (b) Extinguish the rights of, remove, relocate the rights of or reposition the apparatus belonging to statutory undertakers over or within the Order land. National Highways Comments: National Highways must have control over the operations being carried out on its network. This is critical from a safety perspective and to maintain the integrity of the asset. Therefore, the Applicant should be required to obtain National Highways' consent in the event the activities affect the strategic road network or any land National Highways has an interest in. As a public body, National Highways is under a duty to act reasonably in providing such consent and this is expressly provided in paragraph 7(4) of National Highways' proposed protective provisions at Appendix 1. Inclusion of paragraph 7(2) of National Highways' proposed protective provisions would address National Highways' objection to this article, which requires the Applicant to obtain National Highways consent	As noted previously, the Applicant is progressing discussions with National Highways in respect of the form of Protective Provisions to be contained within the **draft Development Consent Order [APP-016].**

			before exercising their right under this article.	

NH-071	Transport and Access	Article 34	Article/Schedule: Article 34 (Apparatus and rights of statutory undertakers in closed or restricted streets) Summary of the Applicant's Drafting: This article governs what happens to statutory utilities apparatus under streets that are closed, altered or diverted by the order. National Highways Comments: The article specifically refers to articles 8, 10, 11 and 12. As noted in relation to those articles, National Highways requires further information to assess the impact of the scheme on its interests. This is critical from a safety perspective and to maintain the integrity of the asset. Therefore, the Applicant should be required to obtain National Highways' consent in the event the activities effect the strategic road network or any land National Highways has an interest in. As a public body, National Highways is under a duty to act reasonably in providing such consent and this is expressly provided in paragraph 7(4) of National Highways' proposed protective provisions at Appendix 1. Inclusion of paragraph 7(2) of National Highways' proposed protective provisions would address National Highways objection to this article, which requires the Applicant to obtain National Highways consent before exercising their right under this article.	As noted previously, the Applicant is progressing discussions with National Highways in respect of the form of Protective Provisions to be contained within the **draft Development Consent Order [APP-016].**

NH-072	Transport and Access	Article 38	Article/Schedule: Article 38 (Application of landlord and tenant law) Summary of the Applicant's Drafting: This article governs the undertaker leasing any part of the authorised development for the purposes of its construction, operation or maintenance to any other person. It allows the terms of the lease to override any statutory provisions relating to landlord and tenant law. National Highways Comments: National Highways do not have sufficient information to understand whether this article is likely to affect National Highways. In any event, National Highways would object to the principle of inclusion of this article and, if necessary, will be seeking to protect its interest by the inclusion of this article in paragraph 7(2) of National Highways' proposed protective provisions. This would address National Highways objection to this article, which requires the Applicant to obtain National Highways consent before exercising their right under this article.	As noted previously, the Applicant is progressing discussions with National Highways in respect of the form of Protective Provisions to be contained within the **draft Development Consent Order [APP-016].**

NH-073	Transport and Access	Article 40	Article/Schedule: Article 40 (Felling or lopping of trees and removal of hedgerows) Summary of the Applicant's Drafting: Subject to article 41 (trees subject to tree preservation orders), the undertaker may fell or lop any tree or shrub near any part of the authorised development or cut back its roots, if it reasonably believes it to be necessary to do so to prevent the tree or shrub from- (a) obstructing or interfering with the construction, maintenance or operation of the authorised development or any apparatus used in connection with the authorised development; (b) constituting a danger to persons using the authorised development; (c) obstructing or interfering with the passage of construction vehicles to the extent necessary for the purposes of constructing the authorised development. National Highways Comments: This article provides the Applicant with the power to fell or lop any tree or shrub near any part of the authorised development. National Highways have environment mitigation commitments that may be affected by the authorised development and may put National Highways in breach of its own statutory obligations. In any event Hedge CRH170 (hedgerow) and CRH173 (important hedgerow) (as shown on the TPO and Hedgerow Plan Sheet 9 of 23) are located on the boundary of the network. In addition, whilst not	Both CRH170 and CRH173 lie within an 'Avoidance Area' which are described in **ES Volume 2, Appendix 3-2: Cable Installation Method Statement [APP-183]** and are where trenchless technologies (such as Horizontal Directional Drilling (HDD) will be employed for cable installation works. As such CRH170 and CHR173 will not be impacted by the Scheme. Up to a 12 m wide section of CRH172 may be removed temporarily for cable route installation works, to enable construction of a cable trench and temporary haul route. On completion of temporary construction, works the section of hedgerow removed will be reinstated or replanted in accordance with the **Outline Ecological Protection and Mitigation Strategy [APP-284].** As noted previously, the Applicant is progressing discussions with National Highways in respect of the form of Protective Provisions to be contained within the **draft Development Consent Order [APP-016].**

			immediately adjacent to the boundary, it is noted that CRH172 (important hedgerow) is close by. Further clarity from the Applicant is needed on the works within Works No SA that may impact CRH170, CRH173 and CRH172 so that National Highways can assess the impact on all of these hedgerows cumulatively. National Highways object to the principle of inclusion of this article and, if necessary, will be seeking to protect its interest by the inclusion of this article in paragraph 7(2) of National Highways' proposed protective provisions. This would address National Highways objection to this article, which requires the Applicant to obtain National Highways consent before exercising their right under this article. If works undertaken to trees affect any National Highways BNG commitments a replacement tree or trees would need to be provided to satisfy that existing commitment at a location to be agreed.	

NH-074	Transport and Access	Article 41	Article/Schedule: Article 41 (Trees subject to tree preservation order) Summary of the Applicant's Drafting: The undertaker may, if it reasonably believes it to be necessary to do so in order to prevent the tree from obstructing or interfering with the construction, maintenance, operation or decommissioning of the authorised development or any apparatus used in connection with the authorised development, fell or lop or cut back the roots of any tree that is subject to a tree preservation order- (a) that is described in Part 4 of Schedule 12 and shown on the TPO and hedgerow plan; or (b) that is within or overhanging land within the Order limits and the relevant tree preservation order was made after the date of this Order. 2) In carrying out any activity authorised by paragraph (1)-(a) the undertaker must do no unnecessary damage to any tree and must pay compensation to any person for any loss or damage arising from such activity; and (b) the duty contained in section 206(1) (replacement of trees) of the 1990 Act does not apply. (3) The authority given by paragraph (1) constitutes a deemed consent under the relevant tree preservation order. National Highways Comments: It is thought that the reference to Part 4 of Schedule 12 is an error since there is only Parts 1-3 of Part 12. Part 3 sets out trees subject to TPO's and notes that these relate to Work Nos5A and 8A for TPO Tree N/TPO8 and N/TPO42	As noted previously, the Applicant is progressing discussions with National Highways in respect of the form of Protective Provisions to be contained within the **draft Development Consent Order [APP-016].**

			(both shown on sheet 9 of 23 of the TPO and Hedgerow Plan). National Highways have no comment on TPO8 on the basis that is located a distance away from its network. However, TPO42 is in close proximity to National Highways' network and therefore our comments above in relation to culminative impact apply equally here. It is noted that TPO7 is not referred to in Schedule 12 but is adjacent to the SRN and forms the boundary to the same. The Applicant is requested to review Schedule 12 in light of the TPO and Hedgerow Plan (sheet 9 of 23). National Highways have environment mitigation commitments that may be affected by the authorised development and may put National Highways in breach of its own statutory obligations. National Highways object to the principle of inclusion of this article and, if necessary, will be seeking to protect its interest by the inclusion of this article in paragraph 7(2) of National Highways' proposed protective provisions. This would address National Highways objection to this article, which requires the Applicant to obtain National Highways consent before exercising their right under this article.	

NH-075	Transport and Access	Article 42	Article/Schedule: Article 42 (Certification of plans and documents etc) Summary of the Applicant's Drafting: National Highways Comments: National Highways reserve the ability to request the addition of any required plans/documents etc to the plans and documents identified in Schedule 12. If works undertaken to trees affect any National Highways BNG commitments a replacement tree or trees would need to be provided to satisfy that existing commitment at a location to be agreed.	The Applicant notes that the list of certified plans and documents contained in Schedule 13 (Documents and plans to be certified) is fixed by the **draft Development Consent Order [APP-016]** and cannot be amended unilaterally. Detailed plans and mitigation measures affecting National Highways' land or assets are instead secured through the Requirements within Schedule 2 (requirements). As noted previously, the Applicant is also progressing discussions with National Highways in respect of the form of Protective Provisions to be contained within the **draft Development Consent Order [APP-016].**

NH-076	Transport and Access	Article 47	Article/Schedule: Article 47 (Procedure in relation to certain approvals etc) Summary of the Applicant's Drafting: (4) Save for applications made pursuant to Schedule 16 and where stated to the contrary if, within six weeks (or such longer period as may be agreed between the undertaker and the relevant consenting authority in writing) after the application or request has been submitted to a consenting authority it has not notified the undertaker of its disapproval and the grounds of disapproval, it is deemed to have approved the application or request. National Highways Comments: Sub- paragraph 4 of article 47 includes deemed approval which is granted where National Highways does not provide its consent or approval to any provisions under the order within 6 weeks of it being requested where no response is received. 6 weeks is not considered a reasonable period of time to consider every application that may come through under this DCO, some may be more involved than others. 8 weeks would be considered reasonable In any event, National Highways is concerned with the deemed consent given the safety implications of works being carried out to or under the strategic road network that may have bypassed its approval processes. This is a fundamental issue of public safety that should not be compromised to enable a private developer to achieve a quicker build programme. National	As noted previously, the Applicant is progressing discussions with National Highways in respect of the form of Protective Provisions to be contained within the **draft Development Consent Order [APP-016].**

			Highways has statutory obligations to behave reasonably and support sustainable development and so it should not be forced to work under the pressure of deemed consent. The potential implications from a safety perspective of something going wrong far outweigh the Applicant's case for such a provision Inclusion of paragraph 7(7) of National Highways proposed protective provisions at Appendix 1 would address National Highways concerns which would seek to disapply article 47 in the context of any consent relating to the strategic road network. The effect of this is to prevent the Promoter from exercising powers over the SRN or land in which National Highways has an interest without deemed consent applying. The justification is to ensure open dialogue between the parties so that National Highways has control over the operations being carried out on its network. This is critical from a safety perspective and to maintain the integrity of the asset. As a public body, National Highway is under a duty to act reasonably and this is expressly provided in - paragraph 7(4) of National Highways' protective provisions.	

NH-077	Transport and Access	Schedule 2	Article/Schedule: Schedule 2 Summary of the Applicant's Drafting: Requirement 3 (1) The undertaker may submit any amendments to any approved document to the relevant planning authority for approval in consultation with National Highways and, following approval, the relevant approved document is to be taken to include the amendments approved under this paragraph. National Highways Comments: National Highways should be given an opportunity to review any variations to the approved documents and plans to ensure that any changes do not adversely impact the SRN. This is in the interest of maintaining the safe and efficient operation of the SRN Inclusion of drafting in red would address National Highways' concern.	The Applicant notes that National Highways will already be a consultee where it is the Relevant Highway Authority for the discharge of the detailed Construction Traffic Management Plan under Requirement 15 and Public Rights of Way and Permissive Paths Management Plan under Requirement 16. The Applicant will engage in further discussions with National Highways with regard to their involvement as a consultee in the discharge of Requirements regarding other management plans, but would need to understand from National Highways as to the specific reasons it should be included as a consultee in each instance, noting the management plans that have the potential to have impacts on the SRN are already captured. The Applicant also notes that National Highways' involvement where its interests may be affected will be controlled by Protective Provisions for its benefit. As noted previously, the Applicant is progressing discussions with National Highways in respect of the form of Protective Provisions to be contained within the **draft Development Consent Order [APP-016].**

NH-078	Transport and Access	Schedule 2	Article/Schedule: Schedule 2 Summary of the Applicant's Drafting: Requirement 3 (1) The undertaker may submit any amendments to any approved document to the relevant planning authority for approval in consultation with National Highways and, following approval, the relevant approved document is to be taken to include the amendments approved under this paragraph. National Highways Comments: National Highways should be given an opportunity to review any variations to the approved documents and plans to ensure that any changes do not adversely impact the SRN. This is in the interest of maintaining the safe and efficient operation of the SRN. Inclusion of drafting in red would address National Highways' concern.	The Applicant notes this comment. Please see the response given above.

NH-079	Transport and Access	Schedule 2	Article/Schedule: Schedule 2 Summary of the Applicant's Drafting: Requirement 5 5. No part of Work Nos. 1, 2 Gr-3 or Sa may commence until details of- (a) the layout; (b) scale; (c) proposed finished ground levels; (d) external appearance; (e) hard surfacing materials; and (f) vehicular and pedestrian access, parking and circulation areas, relating to that part have been submitted and approved by the relevant planning authority for that part. (5) Works No Sa must be carried out in accordance with The Design Manual for Roads and Bridges (DMRB) Chapter CD622 (Managing Geotechnical Risk). National Highways Comments: National Highways should be given an opportunity to review any variations to the approved documents and plans to ensure that any changes do not adversely impact the SRN. This is in the interest of maintaining the safe and efficient operation of the SRN Inclusion of drafting in red would address National Highways' concern.	The Applicant notes this comment. Please see the response given above.

NH-080	Transport and Access	Schedule 2	Article/Schedule: Schedule 2 Summary of the Applicant's Drafting: Requirement 7 (1) No part of the authorised development may commence until a written landscape and ecological management plan has been submitted to and approved by the relevant planning authority in consultation with National Highways for that part or, where the part falls within the administrative areas of multiple relevant planning authorities, each of the relevant planning authorities in consultation with Natural England. National Highways Comments: National Highways should be given an opportunity to review the landscape and ecological management plan, arboricultural assessment/tree protection measures and any replanting proposals in respect of National Highways' soft estate.	The Applicant notes this comment. Please see the response given above.
NH-081	Transport and Access	Schedule 2	Article/Schedule: Schedule 2 Summary of the Applicant's Drafting: Requirement 8 (1) No part of the authorised development may commence until a written ecological protection and mitigation strategy has been submitted to and approved by the relevant planning authority in consultation with National Highways for that part or, where the phase falls within the administrative areas of multiple relevant planning authorities, each of the relevant planning authorities in consultation with Natural England.	The Applicant notes this comment. Please see the response given above.

			National Highways Comments: National Highways should be given the opportunity to review the details proposed. Inclusion of drafting in red would address National Highways' concern.	
NH-082	Transport and Access	Schedule 2	Article/Schedule: Schedule 2 Summary of the Applicant's Drafting: Requirement 10 (1) No part of the authorised development may commence until written details of all proposed temporary fences, walls or other means of enclosure, including those set out in the construction environmental management plan, for that part have been submitted to and approved by the relevant planning authority in consultation with National Highways. (2) No part of the authorised development may commence until written details of all permanent fences, walls or other means of enclosure for that part have been submitted to and approved by the relevant planning authority in consultation with National Highways. National Highways Comments: National Highways should be given the opportunity to review the details of any proposed fences, walls or enclosures if within the vicinity of the SRN for reasons of safety, liability, and maintenance and to ensure compliance paragraph 57 of DfT Circular 01/2022	The Applicant notes this comment. Please see the response given above.

			which sets out any structures "*must be located outside of the highway boundary of the SRN. In general terms, structures should be sited sufficiently far from the highway boundary of the SRN so that they cannot topple on to the SRN or undermine its geotechnical integrity*"	

NH-083	Transport and Access	Schedule 2	Article/Schedule: Schedule 2 Summary of the Applicant's Drafting: Requirement 11 No part of the authorised development may commence until written details of the surface water drainage scheme and (if any) foul water drainage system for that part have been submitted to and approved by the relevant planning authority in consultation with the Environment Agency and National Highways. National Highways Comments: National Highways should be given the opportunity to review the details of the surface water and foul water drainage system to ensure the integrity of the SRN drainage infrastructure is not interfered with and that any plans are in accordance with DIT Circular 01/2022. Please see National Highways comments at article 17 above. Particular attention must be given where the drainage is adjacent to the SRN or National Highways land, as changes in water management could directly affect the SRN asset. No surface water run-off from the development shall be discharged into the SRN drainage systems. No new drainage connections from third-party developments will be permitted. Inclusion of drafting in red would address National Highways' concern.	The Applicant notes this comment. Please see the response given above.

NH-084	Transport and Access	Schedule 2	Article/Schedule: Schedule 2 Summary of the Applicant's Drafting: Requirement 13 No part of the authorised development may commence until a construction environmental management plan for that part has been submitted to and approved by the relevant planning authority in consultation with National Highways. National Highways Comments: National Highways should be given an opportunity to review the CEMP to ensure appropriate safeguards are implemented and maintained, with consideration of potential impacts on the SRN. Inclusion of drafting in red would address National Highways' concern.	The Applicant notes this comment. Please see the response given above.
NH-085	Transport and Access	Schedule 2	Article/Schedule: Schedule 2 Summary of the Applicant's Drafting: Requirement 14 (1) Prior to the date of final commissioning for any part of the authorised development, an operational environmental management plan for that part must be submitted to and approved by the relevant planning authority in consultation with National Highways. National Highways Comments: National Highways should be given the opportunity to review the details of the operational environment management plan to ensure the management of lona-term environmental risks associated with the site and ensure	The Applicant notes this comment. Please see the response given above.

			ongoing protection of the SRN. Inclusion of drafting in red would address National Highways' concern.	
NH-086	Transport and Access	Schedule 2	Article/Schedule: Schedule 2 Summary of the Applicant's Drafting: Requirement 15: (1) No part of the authorised development may commence until a construction traffic management plan for that part must be submitted to and approved by the relevant planning authority in consultation with SouthGloucestershire Council (2) The construction traffic management plan must be substantially in accordance with the outline construction traffic management plan (3) Before approving the construction management plan the relevant planning authority must consult with the relevant highway authority including National Highways (3) Before approving the construction management plan the relevant planning	The Applicant notes this comment. Please see the response given above. As noted previously, National Highways was involved as a consultee during the preparation of the **outline Construction Traffic Management Plan [APP-287].** This is secured by Requirement 15 of Schedule 2 to the **draft Development Consent Order [APP-016].**

			authority must consult with the relevant highway authority including National Highways National Highways Comments: National Highways should be given the opportunity to review the details of the construction traffic management plan to ensure the management of long-term environmental risks associated with the site and ensure ongoing protection of the SRN. Inclusion of drafting in red would address National Highways' concern.	
NH-087	Transport and Access	Schedule 2	Article/Schedule: Schedule 2 Summary of the Applicant's Drafting: Requirement 20 (5) No decommissioning works must be carried out until the relevant planning authority has approved the decommissioning plan submitted in relation to those works, in consultation with South Gloucestershire Council and the Environment Agency and National Highways. National Highways Comments: National Highways should be given the opportunity to review the details of the decommissioning plan. This should include a transport assessment and construction environmental impacts to ensure that the decommissioning process will not adversely affect the SRN. This is particularly important where restoration to previous site use is proposed. Inclusion of drafting in red would address National Highways' concern.	The Applicant notes this comment. Please see the response given above in relation to the Applicant's position on National Highways' involvement as a consultee on the various management plans, including the **outline Decommissioning Strategy [APP-279]**.

NH-088	Transport and Access	Schedule 16	Article/Schedule: Schedule 16 (Procedure for the Discharge of Requirements) Summary of the Applicant's Drafting: Paragraph 3 of this schedule, Further Information and consultation, states 3.- (1) In relation to any application to which this Schedule applies, the relevant planning authority may request such reasonable further information from the undertaker as is necessary to enable it to consider the application. (2) In the event that the relevant planning authority considers such further information to be necessary and the provision governing or requiring the application does not specify that consultation with a requirement consultee is required, the relevant planning authority must, within 10 working days of receipt of the application, notify the undertaker in writing specifying the further information required. (3) If the provision governing or requiring the application specifies that consultation with a requirement consultee is required, the relevant planning authority must issue the consultation to the requirement consultee within 5 working days of receipt of the application, and must notify the undertaker in writing specifying any further information the relevant planning authority considers necessary or that is requested by the requirement consultee within 5 working days of receipt of such a request and in any event within 15 working days of	

			receipt of the application (or such other period as is agreed in writing between the undertaker and the relevant planning authority). (4) In the event that the relevant planning authority does not give notification as specified in sub-paragraph (2) or (3) it is deemed to have sufficient information to consider the application and is not thereafter entitled to request further information without the prior agreement of the undertaker. (5) Where further information is requested under this paragraph in relation to part only of an application, that part is to be treated as separate from the remainder of the application for the purposes of calculating time periods in paragraph 2 and paragraph 3. National Highways Comments: The definition of "*requirement consultee*" means any body or authority named in a requirement as a body to be consulted by the relevant planning authority in discharging that requirement. National Highways is therefore a requirement consultee. The timetable for the LPA requesting further information in paragraph 3(3), if missed by the LPA could adversely affect National Highways as a requirement consultee If LPA does not request the further information in time, it is deemed to have sufficient information to consider the application which could, in turn, mean that National Highways are not given the opportunity to comment	

			on the same which is effectively deemed consent. 5 days is not long enough, and in any event the provisions of 3(4) are considered disproportionate and National Highways cannot agree to the same. At least 28 days would be a more reasonable period.	
NH-089	Transport and Access	SRN	7 Additional interface 7.1 The Authorised Development will also interface with the Strategic Road Network in the following way: A) Traffic and Transport - Construction Phase National Highways have reviewed Chapter 13 - Transport and Access of the Environmental Statement (APP/6.1), including the associated Transport Assessment provided by the Applicant (APP/6.3). National Highways note that subject to the DCO process construction could commence in 2027 with the development operational by 2029. It is acknowledged that the primary traffic impact will be during the construction phase which is anticipated to last for 24 months. All construction vehicles will route to the sites via the	The Applicant acknowledges National Highways' review of **Chapter 13 Transport and Access [APP-065]** and the accompanying **Transport Assessment [APP-233]**, including the anticipated construction programme commencing in 2027 and lasting approximately 24 months. As set out in Table 13-23 of Chapter 13 Transport and Access [APP-065] the predicted average daily two-way construction vehicles movements for the Solar PV sites are as follows: M4 Junction 18: approximately 268 movements (including 50 HGVs), and M4 Junction 17: approximately 338 movements (including 98 HGVs)

			M4 at either junction 17 or 18. The Applicant predicts average daily two-way vehicle movements in the order of: M4 J18 - 237 (of which 45 HGVs); M4 J17 - 224 (of which 58 HGVs).	
NH-090	Transport and Access	SRN	On the basis that the traffic impact represents a low percentage increase in M4 vehicle flows, the Applicant is not proposing to undertake any further assessment of traffic impacts for the SRN. It should be noted that National Highways would not usually accept percentage-flow changes as a measure of traffic impacts on the SRN, but it is recognised that the impact will be temporary for the construction period only and is considered unlikely to result in an unacceptable or severe impact on the M4 and junctions 17 and 18 in accordance with the NPPF and DfT Circular 01/2022. No further capacity assessment in respect of the SRN is therefore sought. The Applicant has submitted an outline construction traffic management plan and it will be necessary for National Highways to review a final plan as noted above	The Applicant welcomes National Highways' confirmation that no further capacity assessment is required for the SRN. Construction vehicle movements will be managed through a **Construction Traffic Management Plan. An Outline Construction Traffic Management Plan (CTMP) [APP-277]** has been prepared and submitted with the Application. The CTMP sets out measures to ensure that the effect of construction traffic on the local highway network is minimised, including defined construction access points, approved HGV routes, coordination of deliveries, and timing restrictions to avoid peak traffic periods where practicable. The preparation, approval and implementation of the final CTMP,

			under Requirement 15 in respect of M4 measures.	substantially in accordance with the outline CTMP, are secured through Requirement 15 of Schedule 2 of the **Draft Development Consent Order [APP-016],** ensuring construction traffic effects on the M4 are appropriately managed throughout the construction phase.
NH-091	Transport and Access	Operational Phase	B) Traffic and Transport - Operational Phase Once operational the scheme will generate minimal traffic which is not expected to result in any material impact on the SRN.	The Applicant notes this comment.
NH-092	Transport and Access	Decommissioning Phase	C) Traffic and Transport- Decommissioning Phase National Highways note from Chapter 13 - Transport and Access of the Environmental Statement (APP/6-1) and the Transport Assessment (APP/6.3) that vehicle movements associated with the decommissioning phase are not expected to exceed those generated during the construction period.	The Applicant notes this comment.

NH-093	Transport and Access	Abnormal Loads	D) Abnormal Loads National Highways understand the project will require abnormal loads for specific equipment and materials to the site on the SRN. National Highways encourages the Applicant to engage with National Highways early in the process to establish an effective movement strategy. Please note that a Special Order will be required for loads exceeding 150 tonnes pursuant to section 44 of the Road Traffic Act 1988. This falls outside of the DCO process. The Applicant will be expected to complete an appropriate assessment of any routing for abnormal load movements to determine whether the network is structurally capable of accommodating the proposed heavy loads. The Applicant must submit a formal application closer to the actual movement date once a haulier has been appointed. At that time, route suitability will need to be re-checked with all relevant structure and road owners, and a Special Order permit for the movement will be issued.	The Applicant notes this comment.

NH-094	Transport and Access	Abnormal Loads	7.2 To date, National Highways has not entered discussions with the Applicant, and no matters have been discussed or agreed upon concerning the Statement of Common Ground.	The Applicant makes note of this comment. A Statement of Common Ground is being prepared and will be submitted to National Highways for review and approval before Deadline 1

NH-095	Transport and Access	Abnormal Loads	7.3 As protective provisions have not been agreed with the Applicant to date, National Highways includes as part of its relevant representation, a submission detailing the precise need for the protections which are requested in the form of the protective provisions appended at Appendix 1.	Part 5 of Schedule 15 (given effect by Article 45 (Protective Provisions)) to the **draft Development Consent Order [APP-016]** contains draft Protective Provisions for the benefit of National Highways which are intended to safeguard the operation, safety and integrity of the Strategic Road Network and to ensure that any exercise of powers affecting National Highways' land, rights or assets is appropriately controlled. The Applicant is progressing discussions with National Highways in respect of the form of Protective Provisions to be contained within the **draft Development Consent Order [APP-016].**

NH-096	Transport and Access	Protective Provisions	8.1 In order to facilitate the withdrawal of National Highways' objection to the DCO and Authorised Development, National Highways requests that the Applicant includes the National Highways protective provisions at Appendix 1 to the draft Order at the next deadline.	As noted previously, the Applicant is progressing discussions with National Highways in respect of the form of Protective Provisions to be contained within the **draft Development Consent Order [APP-016].**
NH-097	Transport and Access	Protective Provisions	8.2 National Highways will continue to discuss the protective provisions with the Applicant in an effort to reach agreement and will update the Examining Authority at a later deadline. 8.3 A full justification for each of the key provisions and definitions of National Highways protective provisions is set out below:	As noted previously, the Applicant is progressing discussions with National Highways in respect of the form of Protective Provisions to be contained within the **draft Development Consent Order [APP-016].**
NH-098	Transport and Access	Protective Provisions	NH Protective Provision Paragraph: Paragraph 1 Heading: Application Justification: This provision has effect to preserve the statutory powers and duties of National Highways except where expressly amended by the Order.	As noted previously, the Applicant is progressing discussions with National Highways in respect of the form of Protective Provisions to be contained within the **draft Development Consent Order [APP-016].**
NH-099	Transport and Access	Protective Provisions	NH Protective Provision Paragraph: 2 Heading: Interpretation Justification: Key provisions: "*as built information"* - contains the relevant information required by National Highways in order to issue the provisional certificate, certifying that works in, on under or over the SRN are satisfactorily complete and safe from National Highways' perspective. *"bond sum*" - this provides that a bond sum required is 200% of the cost of the specified works in, on under or over the	As noted previously, the Applicant is progressing discussions with National Highways in respect of the form of Protective Provisions to be contained within the **draft Development Consent Order [APP-016].**

			SRN. The bond required is not the total cost of the works but rather the section of works specifically impacting the SRN. Much in the same way as a section 278 agreement, bonding is required to protect National Highways from financial liability in the event that the Applicant defaulted on the works which impact the SRN. "*commuted sum*" - provision of financial security to National Highways for any assets which require ongoing maintenance. Where the authorised development includes works which will require ongoing maintenance, this should be funded by the Applicant and not become a burden on the public purse. "*detailed design information*" - contains the relevant information required by National Highways in order to approve the commencement of the specified works affecting the SRN. In the experience of National Highways' highway engineers, this definition includes all necessary drawings, specifications and calculations required for signing off works in, on, under or over the SRN but may need to be supplemented depending on the nature of the project. "*road space booking"* - National Highways has a strict procedure for managing network occupancy to ensure that they are aware of who is working on the SRN at any given point. It also ensures that sections of the SRN are not subject to conflicting or multiple sets of maintenance work. "*specified works"* - any work authorised by the order (including maintenance) which is on, in,	

			under or over the strategic road network. Importantly, this covers the highway estate as well as the operational highway land to ensure that works beneath the highway or above it are subject to the same requirements as work to the highway stratum itself. Critically, works which occur under or over the SRN can still have a detrimental operational impact to the functioning of the undertaking and can result in significant safety impacts. "*strategic road network*" includes all operational land of National Highways within the order limits and also the highway estate itself to protect the safe functioning of the SRN.	

NH-100	Transport and Access	Protective Provisions	NH Protective Provision Paragraph: Paragraph 3 Heading: General Justification: Parts of the SRN are routinely managed by design build finance and operate contractors, who have primary responsibility for managing the asset. The purpose of these provisions is to ensure that, where the road subject to the specified works is managed under a DBFO contract, the highway operations and maintenance contractor can take the benefit of the protective provisions. Otherwise, any claim that the highway operations and maintenance contractor had against the Applicant by virtue of its stewardship of the asset would need to be through a claim made by National Highways and sub-recovered by the DBFO contractor. This is unnecessary, inefficient and creates a contractual risk to National Highways, as the DBFO contract does not cater for risks occasioned by third party development.	As noted previously, the Applicant is progressing discussions with National Highways in respect of the form of Protective Provisions to be contained within the **draft Development Consent Order [APP-016].**

NH-101	Transport and Access	Protective Provisions	NH Protective Provision Paragraph: 4 Heading: General Justification: To ensure that routine maintenance work to the highway does not compromise the integrity of any assets co-located in the subsoil.	As noted previously, the Applicant is progressing discussions with National Highways in respect of the form of Protective Provisions to be contained within the **draft Development Consent Order [APP-016].**
NH-102	Transport and Access	Protective Provisions	NH Protective Provision Paragraph: 7 Heading: Prior approvals and security Justification: To ensure that the specification of the specified works and all associated processes inc. traffic management, financial provision for ongoing maintenance liabilities, scope of maintenance, condition surveys and road safety audits are addressed prior to commencement of works affecting the SRN. All of this information is required whether the specified works comprise of works to the highway or not. For example, scaffolding erected either side of the highway to install overhead lines would require a scheme of traffic management, as it would not be safe to carry out such dangerous works over an online part of the SRN. Likewise, undergrounding a pipeline or cable via horizontal directional drilling could not take place without condition surveys of the SRN taking place prior to commencement of works, as without this it would be impossible to know whether the specified works had caused subsidence or displacement in	As noted previously, the Applicant is progressing discussions with National Highways in respect of the form of Protective Provisions to be contained within the **draft Development Consent Order [APP-016].**

			the carriageway. National Highways also requires collateral warranties from any contractor and designer of the specified works affecting the SRN, to ensure appropriate contractual liabilities are recoverable. No exercise of any article set out in 7(2) should take place without the express consent of National Highways, to ensure that National Highways is aware of the progress of the specified works affecting the SRN, the scope of those operations, the potential impact to road users and to ensure that compulsory acquisition is managed appropriately and proportionately.	
NH-103	Transport and Access	Protective Provisions	NH Protective Provision Paragraph: 8 Heading: Construction of the specified works Justification: The construction of the specified works must be carried out in accordance with National Highways' road space booking procedures to ensure the safety of road users and other contractors on the network. They must also be carried out in accordance with the relevant technical standards where relevant to the works, to ensure consistency with the SRN. Emergency access is to be granted to National Highways in the event of or to prevent the occurrence of danger to the public.	As noted previously, the Applicant is progressing discussions with National Highways in respect of the form of Protective Provisions to be contained within the **draft Development Consent Order [APP-016].**

NH-104	Transport and Access	Protective Provisions	NH Protective Provision Paragraph:9 Heading: Payments Justification: The reasonable costs incurred by National Highways in the administration of the design approval process, the transfer of land, supervision of works, legal costs and VAT should be payable by the Applicant. But for the Applicant's scheme, National Highways would not have to expend resources on the specified works.	As noted previously, the Applicant is progressing discussions with National Highways in respect of the form of Protective Provisions to be contained within the **draft Development Consent Order [APP-016].**
NH-105	Transport and Access	Protective Provisions	NH Protective Provision Paragraph: 10 Heading: Provisional Certificate Justification: Where any specified work is proposed to the SRN, on, over or under the highway, the requirements of National Highways' design checking and approval process is required to be discharged. Works underneath the highway or oversailing it have significant potential to cause damage both to the highway itself and to road users and it is critical to the safe and efficient operation of the SRN that works are signed off by National Highways engineers as safe, where there is an interface with the SRN. This provision is also required for the purposes of the Applicant as it has the effect of reducing the bond sum to 20% on the issue of the provisional certificate.	As noted previously, the Applicant is progressing discussions with National Highways in respect of the form of Protective Provisions to be contained within the **draft Development Consent Order [APP-016].**

NH-106	Transport and Access	Protective Provisions	NH Protective Provision Paragraph: 11 Heading: Opening Justification: This is relevant only where the SRN has been subject to traffic management orders or temporary closure as a result of the Authorised Development.	As noted previously, the Applicant is progressing discussions with National Highways in respect of the form of Protective Provisions to be contained within the **draft Development Consent Order [APP-016].**
NH-107	Transport and Access	Protective Provisions	NH Protective Provision Paragraph: 12 Heading: Final Condition Survey Justification: Where specified works include horizontal directional drilling, as part of the approval of works and prior to commencement, a condition survey of the highway is required. A final condition survey is required on completion of the horizontal directional drilling works, to identify any settlement of the carriageway in accordance with the threshold levels set out in technical standard DMRB CD622. If any settlement beyond tolerance is identified, this would pose a safety risk to road users, as part of the carriageway would have collapsed to unsafe levels. National Highways would require this defect to be remedied. This provision also applies to works to the SRN itself as any final condition survey would inform the decision on issue of the final certificate.	As noted previously, the Applicant is progressing discussions with National Highways in respect of the form of Protective Provisions to be contained within the **draft Development Consent Order [APP-016].**

NH-108	Transport and Access	Protective Provisions	NH Protective Provision Paragraph: 13 Heading: Defects Period Justification: On the issue of the provisional certificate, the Applicant will be required to remedy any defect in the SRN caused by the specified works for a period of 12 months. Where National Highways' network is damaged by works carried out pursuant to the DCO, it is for the Applicant to remedy that damage.	As noted previously, the Applicant is progressing discussions with National Highways in respect of the form of Protective Provisions to be contained within the **draft Development Consent Order [APP-016].**
NH-109	Transport and Access	Protective Provisions	NH Protective Provision Paragraph: 14 Heading: Final Certificate Justification: This provision is required in order to release the bond in full, to ensure that the National Highways costs are paid by the Applicant and to ensure that National Highways is given a final opportunity to inspect the SRN and be satisfied that the specified works have not resulted in damage to the statutory undertaking.	As noted previously, the Applicant is progressing discussions with National Highways in respect of the form of Protective Provisions to be contained within the **draft Development Consent Order [APP-016].**
NH-110	Transport and Access	Protective Provisions	NH Protective Provision Paragraph: 15 Heading: Security Justification: The Applicant is proposing to carry out works to the highway and beneath the highway in land owned by National Highways. These works may be commenced and not completed, may be constructed contrary to the approved design or may be suspended due to the dissolution of the Applicant. In such cases, National Highways is exposed to a potentially significant financial burden in removing the works from the highway estate. Outside the Planning Act 2008,	As noted previously, the Applicant is progressing discussions with National Highways in respect of the form of Protective Provisions to be contained within the **draft Development Consent Order [APP-016].**

			payment for any works which an authority are authorised to execute (i.e. not just works to the highway itself) may be secured under a section 278 agreement, with such a payment being secured through a bond or cash deposit. In the absence of any commitment by the Applicant to enter into a section 278 agreement containing provisions to put security in place for the benefit of National Highways, the National Highways protective provisions require security in a manner which is consistent with the measures applying to developments carried out under the Town and Country Planning Act 1990, applying the provisions of the Highways Act 1980. The National Highways protective provisions are an appropriate mechanism to assure security such as a bond and without this, National Highways would be faced with potentially significant financial liabilities for which it is not funded and has no budget.	

NH-111	Transport and Access	Protective Provisions	NH Protective Provision Paragraph: 16 Heading: Commuted Sum Justification: Where the Applicant proposes to install apparatus on the highway, a commuted sum is required to contribute to the maintenance of the apparatus. It is not for the public purse to pay for maintenance of apparatus that is added to the highway estate as a consequence of third party development, without contribution.	As noted previously, the Applicant is progressing discussions with National Highways in respect of the form of Protective Provisions to be contained within the **draft Development Consent Order [APP-016].**
NH-112	Transport and Access	Protective Provisions	NH Protective Provision Paragraph: 17 Heading: Insurance Justification: Insurance is required of all contractors working on the SRN and this should extend to operations carried on over and under the highway due to the potential for damage to infrastructure, highway assets and road users.	As noted previously, the Applicant is progressing discussions with National Highways in respect of the form of Protective Provisions to be contained within the **draft Development Consent Order [APP-016].**

NH-113	Transport and Access	Protective Provisions	NH Protective Provision Paragraph: 18 Heading: Indemnity Justification: National Highways must be held harmless for the construction, maintenance and operation of the Authorised Development and any resultant impacts and it is common practice for statutory undertakers to be indemnified in such circumstances. It should not be for the public purse to cover instances of loss or damage occasioned by third party works.	As noted previously, the Applicant is progressing discussions with National Highways in respect of the form of Protective Provisions to be contained within the **draft Development Consent Order [APP-016].**
NH-114	Transport and Access	Protective Provisions	NH Protective Provision Paragraph: 19 Heading: Maintenance of the specified works Justification: To ensure that where maintenance to a specified work is required, the relevant road space booking procedures are complied with to ensure the safety of contractors and road users.	As noted previously, the Applicant is progressing discussions with National Highways in respect of the form of Protective Provisions to be contained within the **draft Development Consent Order [APP-016].**
NH-115	Transport and Access	Protective Provisions	NH Protective Provision Paragraph: 20 Heading: Land Justification: To ensure that matters of compulsory acquisition are directed to the legal team at National Highways and to ensure that powers are not exercised by way of GVD circumventing National Highways' ability to impose restrictions and controls on the use of the land in a way which would impact on the SRN or be detrimental to safety.	As noted previously, the Applicant is progressing discussions with National Highways in respect of the form of Protective Provisions to be contained within the **draft Development Consent Order [APP-016].**

NH-116	Transport and Access	Protective Provisions	NH Protective Provision Paragraph: 21 Heading: Expert Determination Justification: Expert determination is preferred due to the speed of the process and the often technical nature of the points in dispute being more suited to determination by an Engineer or other highway professional.	As noted previously, the Applicant is progressing discussions with National Highways in respect of the form of Protective Provisions to be contained within the **draft Development Consent Order [APP-016].**
NH-117	Transport and Access	Summary	9 Summary 9.1 For the reasons given above, National Highways objects to the DCO and the Authorised Development and requests that the National Highways protective provisions at Appendix 1 are included on the face of the Order.	As noted previously, the Applicant is progressing discussions with National Highways in respect of the form of Protective Provisions to be contained within the **draft Development Consent Order [APP-016].**
NH-118	Transport and Access	Summary	9.2 Should it assist the ExA, National Highways will respond to any written questions that the panel may have and is willing to attend an appropriate hearing to detail the impacts of the Authorised Development to National Highways.	The Applicant notes this comment.
NH-119	Transport and Access	Summary	National Highways attached Appendix 1: FOR THE PROTECTION OF NATIONAL HIGHWAYS LIMITED to their Relevant Representation	The Applicant notes this comment.

3.6 Dorset and Wiltshire Fire & Rescue

Table 3-6 RR-1190

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
DWFR-001	Other Environmental Matters	Interest	Dorset & Wiltshire Fire and Rescue Service have an interest in this development and wish to be consulted on the progress of the application in order to ensure appropriate guidance can be offered and to allow for comment related to operational response to emergency incidents in or related to the development site. Further substantive comment on the proposed site will be provided in due course.	The Applicant notes this comment and welcomes continued engagement with Dorset & Wiltshire Fire and Rescue Service.

3.7 Defence Infrastructure Organisation

Table 3-7 RR-1125

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response

DIO-001	Description and DCO Process	Introduction	MOD Safeguarding-Central WAM Network and RAF Keevil Proposal: Lime Down Solar Park Limited (the Applicant) seeks development consent, under the Planning Act 2008, to construct, operate, maintain and decommission a solar photovoltaic (PV) generating station, with a generating capacity of more than 50 megawatts (MW) and associated infrastructure on land largely within the administrative area of Wiltshire Council, with small areas of existing highway within the administrative area of South Gloucestershire Council. The proposal, subject of our application for development consent (the Application), is called Lime Down Solar Park (the Scheme). Thank you for further consulting the Ministry of Defence (MOD), following a targeted consultation under Section 42 of the Planning Act 2008 and our subsequent response dated 24th July 2025. A letter informing of the Notice of Acceptance of an application for a Development Consent Order (DCO) by the Planning Inspectorate (on behalf of the Secretary of State) under Section 56 of the Planning Act 2008 was received from Lime Down Solar Park Limited by post to Defence Infrastructure Organisation (DIO) colleagues at offices at RAF Wyton and passed to our office by email on 12th December 2025.	The Applicant notes this comment.

			The Defence Infrastructure Organisation (DIO) Safeguarding Team represents the Ministry of Defence (MOD) as a consultee in UK planning and energy consenting systems to ensure that development does not compromise or degrade the operation of defence sites such as aerodromes, explosives storage sites, air weapon ranges, and technical sites or training resources such as the Military Low Flying System. Please note that all future correspondence should be sent to the multi-user email address as above.	
DIO-002	Description and DCO Process	Safeguarding	This application is a Development Consent Order with the applicant seeking approval for the installation of solar photovoltaic (PV) panels and an on-site battery energy storage system (BESS) which will include an underground cable connection to the national grid at Melksham Substation. The proposed development occupies the statutory height and birdstrike safeguarding zones that surround RAF	The Applicant notes this comment.

			Keevil as well as the statutory technical safeguarding zones that surround the Central Wide Area Multilateration (WAM) Network.	
DIO-003	Other Environmental Matters	Technical Site Safeguarding Zones	Technical Site Safeguarding Zones Technical safeguarding zones define areas surrounding radars, radio transmitter/ receiver sites and other types of technical installations supporting operational defence or national security requirements within which the heights of development, materials used in construction and introduction of sources of electro-magnetic fields are regulated. As mentioned in our previous letter and based upon the information provided, part of the preferred routes for the proposed cable route corridor occupies the technical safeguarding zone in place to protect the Central WAM Network. In this area the MOD must be consulted on any development or change of land use. There is the potential that the operation, construction and decommissioning phases of the proposed cable route may impact upon the effective operation of this safeguarded technical asset. It will be necessary for the MOD to be consulted on any development or change of land use within the statutory Central WAM Network technical safeguarding zone to ensure the cable routing is compatible with MOD's	The Applicant acknowledges the MOD's safeguarding requirements in relation to the Central WAM Network technical safeguarding zone and notes that sections of the preferred cable route corridor fall within this area. The Applicant has assessed potential effects on safeguarded technical assets during construction, operation and decommissioning within **ES Volume 1, Chapter 20: Other Environmental Matters (Sections 20.4 Telecommunications, Utilities and Television and 20.6 Electromagnetic Fields) [APP-072]** and, as stated in the **Outline CEMP [APP-277]**, will consult the MOD to ensure the final cable alignment and construction methodology remain compatible with safeguarding requirements. The Applicant confirms that the DIO safeguarding team will be informed as the detailed design of the cable route is finalised and, where relevant, will be notified in advance of any cranes, tall construction equipment or temporary structures to ensure that defence capability and operations are not adversely affected.

			safeguarding requirements. We note the statement in document titled Outline Construction Environmental Management Plan Ref APP/7.12 3.19 Electromagnetic Fields Table 18: Electromagnetic Fields in which the applicant states "*The Ministry of Defence will be consulted on any development or change of land use within the statutory Central WAM Network Safeguarding Zone to ensure cable routing is compatible with safeguarding requirements.*" We welcome this engagement and would request that the MOD is informed as details of the cable route are confirmed and in addition, the MOD is informed in advance of the use of any cranes, tall construction equipment or temporal structures to be used in this development, to ensure defence capability and operations are not adversely affected.	
DIO-004	Other Environmental Matters	Aerodrome Height Safeguarding Zones	Aerodrome height safeguarding zones The aerodrome height safeguarding zones define areas surrounding aerodromes within which the heights of buildings and structures are regulated to prevent the obstruction of the critical air space encompassing the aerodrome within which the principal take-off, landing and circuiting procedures are contained. This protected airspace is known as the Obstacle Limitation Surface (OLS). To ensure assured	The Applicant agrees that the Scheme does not infringe the OLS. The Applicant will continue to engage with the DIO safeguarding team as necessary should any design refinements require further review.

			airspace for aircraft to operate within, there can be no infringements of the OLS, meaning the heights of buildings and structures within this safeguarding zone may be constrained. Based upon the information provided about the general layout and scale of the proposed development, it is not anticipated that it will cause any physical impacts upon aerodrome height safeguarding requirements.	
DIO-005	Other Environmental Matters	Birdstrike Safeguarding Zone	Birdstrike safeguarding zone Within this zone, the principal concern of the MOD is that the creation of new habitats, such as open bodies of water, wetland habitats or other forms of habitat creation both temporary or permanent that may attract and support populations of large and/or flocking birds hazardous to air traffic. The design of any drainage basins, waterbodies, landscaping and planting that may be included in the development, including any on and off-site provision of Biodiversity Net Gain (BNG), should be undertaken to minimise the attractants that are afforded to hazardous bird species in proximity to the aerodrome. In a development such as this the construction and decommissioning phases are also of concern where potentially large areas of disturbed and overturned earth be an attractant to species hazardous to air traffic.	The Applicant notes this comment. As shown on **ES Volume 2, Figure 3-4: Landscape and Ecological Mitigation Plan [APP-084]** the managed arable land and the grassland areas are well distributed throughout the site which, along with ensuring the mitigation land is well integrated into its surroundings, is an approach that prevents bird flocking. Notwithstanding, with regards to potential for bird strike, it is the Applicant's view that there is not a substantial enough change likely to create a difference in the number or assemblages of birds to form flocks that are an obstacle to aircraft. Proposed new habitats likely to attract birds, such as hedgerows, woodland, trees, and managed arable areas are well dispersed across the Scheme and complement existing habitats typically present in the surrounding landscape, and there are no large wetland areas being created where birds may congregate and then take flight together which could cause an issue for aircraft as noted by the respondent. The

			We welcome the engagement and responses already provided by the applicant and would request that this is continued and that the MOD is further consulted with regards to drainage strategies and construction management plans providing proposals to mitigate against attracting large and/or flocking birds hazardous to air traffic.	Applicant looks forward to continuing to engage with the MOD on this matter.

DIO-006	Other Environmental Matters	Summary	Summary In summary, with the limited information submitted by the applicant at this outline stage of the proposal, the MOD advises that it has concerns relating to the proposed development at this location. We welcome the engagement and information that has been provided thus far and acknowledge the comments already made by the applicant. The MOD should continue to be consulted with any changes to proposals, particularly in relation to the concerns mentioned above regarding the construction and demolition phases as well as final cable route decisions, to allow a detailed safeguarding assessment to be completed. As a result of those assessments, the MOD may object to proposals or may seek to apply conditions designed to mitigate potential impacts on the operation or capability of defence sites and assets. The MOD must emphasise that the advice provided within this letter is in response to the data and/or information detailed on the Planning Inspectorate website as of the date of this letter. Any variation of the parameters (which include the location, dimensions, form, and finishing materials) detailed may significantly alter how the development relates to MOD safeguarding requirements and cause adverse impacts to safeguarded defence assets	The Applicant notes this comment. Responses to specific comments raised in the DIO's relevant representation regarding effects on MOD assets have been provided in separate responses above.

			or capabilities. In the event that any amendment, whether considered material or not by the determining authority, is submitted for approval, the MOD should be consulted and provided with adequate time to carry out assessments and provide a formal response. I trust this is clear however should you have any questions please do not hesitate to contact me.	

3.8 National Grid Electricity Distribution

Table 3-8 RR-3424

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
NGED-001	Description and DCO Process	Protective Provisions	Project Reference: EN010168. Relevant Representation submitted by Osborne Clarke LLP on behalf of National Grid Electricity Distribution (South West) plc ("NGED"). Osborne Clarke LLP act for NGED whose registered office is at Avonbank, Feeder Road, Bristol, BS2 0TB. NGED is the licensed distribution network operator under Section 6 Electricity Act 1989 (the "EA 1989) for the area in which the Lime Down Solar Project Development Consent Order 202* (the "Order") is proposed to have effect. Section 9 of the EA 1989 places a duty on NGED as the electricity distributor to develop and maintain an efficient, co-ordinated and economical system of electricity distribution. The application was received by the Planning Inspectorate on 19 September 2025 and accepted on 17 October 2025. The application includes land in or upon which NGED may have assets and which may include (but are not limited to) high voltage electricity cables. NGED is currently reviewing the draft Order setting out the Authorised Development to establish the extent to which their apparatus and interests are affected.	The Applicant notes this comment and welcomes ongoing engagement with NGED.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			While NGED will continue to seek a positive engagement with the applicant in relation to the project, NGED needs to ensure that the wider powers being sought in the Order will not have a detrimental impact on NGED's electricity network and its duties under EA 1989. This includes ensuring acceptable terms of any proposed protective provisions. NGED is therefore making this representation as a holding objection to the application until an asset protection arrangement has been agreed between the parties. No formal agreement has yet been concluded and accordingly we are lodging this representation to protect NGED's position pending conclusion of an appropriate agreement. Once NGED is satisfied that its network is protected, we will notify the Planning Inspectorate promptly and withdraw the objection.	

3.9 National Grid Electricity Transmission Plc

Table 3-9 RR-3425

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response

NGET-001	Description and DCO Process	Introduction	Relevant Representation of National Grid Electricity Transmission Plc in respect of the Lime Down Solar Park DCO This relevant representation is submitted on behalf of National Grid Electricity Transmission Plc ("*NGET*") in respect of Lime Down Solar Park Limited's ("*Applicant*") application for the Lime Down Solar Park Development Consent Order ("*Order*") for the construction, operation and decommissioning of a solar photovoltaic (PV) array electricity generating station of over 50 megawatts (MW) and associated development comprising Battery Energy Storage System (BESS) Area, substations and grid connection infrastructure ("*Scheme"*) to facilitate a connection to NGET's Melksham substation and in particular the interface with NGET's existing and future infrastructure will help us to improve it and land which is within or in close proximity to the proposed limits of the Order ("*Order Limits*").	The Applicant notes this comment.
NGET-002	Description and DCO Process	Protective Provisions	NGET will require appropriate protection for retained apparatus including compliance with relevant standards for works proposed within close proximity of its apparatus. NGET's rights of access to inspect, maintain, renew and repair such apparatus must also be maintained at all times and access to inspect and maintain such apparatus must not be restricted. Further, where the Applicant intends to acquire land or rights, or	Part 3 of Schedule 15 (given effect by Article 45 (Protective Provisions)) to the **draft Development Consent Order [APP-016]** contains draft Protective Provisions for the benefit of NGET which are intended to ensure that any exercise of powers affecting NGET's land, rights or assets is appropriately controlled. The Applicant is progressing discussions with NGET in respect of the form of Protective Provisions to be contained within the final DCO.

			interfere with any of NGET's interests in land or NGET's apparatus, NGET will require appropriate protection and further discussion is required on the impact to its apparatus and rights.	
NGET-003	Description and DCO Process	Protective Provisions	Existing NGET infrastructure within/in close proximity to the proposed Order Limits: NGET owns or operates the following infrastructure within or in close proximity to the proposed Order Limits of Lime Down Solar Park. These assets form an essential part of the electricity transmission network in England and Wales. The details of the electricity assets are as follows: Substation: • MELKSHAM 400 kV/ 275kV and 132kV Sub Stations • Associated overhead and underground apparatus including cables	As noted above, the **draft Development Consent Order [APP-016]** contains draft Protective Provisions for the benefit of NGET. The Applicant is progressing discussions with NGET in respect of the form of Protective Provisions to be contained within the final DCO.
NGET-004	Description and DCO Process	Protective Provisions	Overhead Lines • ZG 400 kV OHL HINKLEY POINT - MELKSHAM 1/HINKLEY POINT - MELKSHAM 2 • 4YX 400 kV OHL MELKSHAM – SEABANK/IMPERIAL PARK – MELKSHAM • ZF 400 kV OHL MELKSHAM - MINETY 1/MELKSHAM - MINETY 2 • YYM 400 kV OHL BRAMLEY - MELKSHAM 1/ BRAMLEY - MELKSHAM 2 • XL 275 kV OHL IRON ACTON - MELKSHAM 1/ IRON ACTON - MELKSHAM 2	As noted above, the **draft Development Consent Order [APP-016]** contains draft Protective Provisions for the benefit of NGET. The Applicant is progressing discussions with NGET in respect of the form of Protective Provisions to be contained within the final DCO.
NGET-005	Description and DCO Process	Protective Provisions	Cable Apparatus • MELKSHAM - THINGLEY: 33 kV Commissioned Cable	As noted above, the **draft Development Consent Order [APP-016]** contains draft Protective Provisions for the benefit of NGET. The Applicant is progressing discussions with NGET in respect of the

				form of Protective Provisions to be contained within the final DCO.
NGET-006	Description and DCO Process	Protective Provisions	Future NGET infrastructure within/in close proximity to the proposed Order Limits: The proposed Order Limits overlap with land required for the following NGET future projects: Cotswolds Visual Impact Mitigation Project (Cotswolds VIP) The Cotswolds VIP project will remove a net amount of 16 pylons and approximately 7.4 km of overhead electricity transmission line from within the Cotswolds National Landscape and replace them with approximately 7km of underground cable, significantly reducing visual impact in this protected area. To support the undergrounding of the transmission line, two shunt reactors will also be installed at Feckenham and Melksham substations, ensuring system stability and ongoing network performance. The Cotswolds VIP project is scheduled for delivery by 31 December 2030 and will extend the Melksham 400kV substation westward. The extension works include the installation of a new 400kV 200MVar shunt reactor, cooler bank and new bay will be built within the extended area. The development will be consented via the Town and Country Planning Act and NGET are in negotiations to secure the required land to the west from the existing landowner. An existing stone	As noted above, the **draft Development Consent Order [APP-016]** contains draft Protective Provisions for the benefit of NGET. The Applicant is progressing discussions with NGET in respect of the form of Protective Provisions to be contained within the final DCO.

			track running north south outside the existing western substation fence line, serving a third party battery storage facility, is required to be diverted to a position further away from the substation to make space for the site extension	
NGET-007	Description and DCO Process	Protective Provisions	PPHinkley Point C Connection As part of the broader Hinkley Connection Project (which was granted consent in 2016 by the Secretary of State), an overhead 400 kV line and underground cable route is being installed from Shurton/Bridgwater to Horsey, with a teein connection via T pylons to Melksham Substation. To facilitate the high loads from Hinkley Point C Power Station, Bramley Circuit 2 and Bridgwater/Shurton Circuit 1 will be swapped via an overhead Line diversion that requires 3 new towers to be built. Two of these towers are located to the east of the substation in fields 16-014 and 16- 019. While initial completion was scheduled for 2024, shifting timelines mean that Melksham's modifications are now due by 2028.	As noted above, the **draft Development Consent Order [APP-016]** contains draft Protective Provisions for the benefit of NGET. The Applicant is progressing discussions with NGET in respect of the form of Protective Provisions to be contained within the final DCO.

NGET-008	Description and DCO Process	Protective Provisions	YYM OHL Reconductoring, Bramley-Melksham 2026 Reconductoring of the 82 km double-circuit 400 kV overhead line between Bramley (Hampshire) and Melksham (Wiltshire) began in 2024 and construction is expected to continue throughout 2026 and 2027. These works will boost line capacity bringing in more electricity into Melksham substation from the southwest, aiding connection of new low-carbon projects.	As noted above, the **draft Development Consent Order [APP-016]** contains draft Protective Provisions for the benefit of NGET. The Applicant is progressing discussions with NGET in respect of the form of Protective Provisions to be contained within the final DCO.
NGET-009	Description and DCO Process	Protective Provisions	Compulsory Acquisition Powers in respect of NGET infrastructure: The Applicant is seeking compulsory powers over plots 16-014, 16-016 16-017, 16-018 and 16-019 which form part of NGET's substation at Melksham. Plots 16-014 and 16-019 are required by NGET for the reconfiguration works noted above and any delays to programme could have a detrimental impact to NGET's statutory undertaking by way of delays to energisation and the potential for constraints on the distribution of loads at this location. NGET objects strongly to the compulsory acquisition of its assets, land or rights over its land in the absence of an agreed form of Protective Provisions. It is essential that nothing contained within the Order prevents NGET from continuing to deliver future plans or from accommodating other electricity connection customers.	As noted above, the **draft Development Consent Order [APP-016]** contains draft Protective Provisions for the benefit of NGET. The Applicant is progressing discussions with NGET in respect of the form of Protective Provisions to be contained within the final DCO.

NGET-010	Description and DCO Process	Protective Provisions	NGET notes that the Book of Reference and Land Plans indicate that the Applicant is seeking permanent acquisition of rights and temporary possession over several land plots which contain NGET apparatus and are subject to rights held by NGET or over plots required for access to maintain their apparatus. In order to protect the above listed NGET projects and NGET's statutory undertaking, the Applicant must not be permitted to acquire or extinguish the rights of NGET in respect of land associated with existing or future NGET apparatus or interests.	As noted above, the **draft Development Consent Order [APP-016]** contains draft Protective Provisions for the benefit of NGET. The Applicant is progressing discussions with NGET in respect of the form of Protective Provisions to be contained within the final DCO.
NGET-011	Description and DCO Process	Protective Provisions	Protection of NGET Assets: Given the above, NGET objects to the Lime Down Solar Park Project until adequate protection is put in place for the benefit of NGET by way of appropriate Protective Provisions. As the design development process progresses, it is essential to ensure that no conflict arises with the proposed location of future NGET apparatus at Melksham substation and surround this location, in recognition of the strategic importance of NGET infrastructure to the transmission and delivery of future energy across the UK, as set out in the Clean Power 2030 report.	As noted above, the **draft Development Consent Order [APP-016]** contains draft Protective Provisions for the benefit of NGET. The Applicant is progressing discussions with NGET in respect of the form of Protective Provisions to be contained within the final DCO.

NGET-012	Description and DCO Process	Protective Provisions	As a responsible statutory undertaker, NGET's primary concern is to meet its statutory obligations and ensure that any development does not impact in any adverse way upon those statutory obligations. As such, NGET has a duty to protect its position in relation to infrastructure and land which is within or in close proximity to the draft Order Limits.	The Applicant notes this comment.
NGET-013	Description and DCO Process	Protective Provisions	As noted, NGET's rights to retain its apparatus in situ and rights of access to inspect, maintain, renew, repair and refurbishment such apparatus located within or in close proximity to the Order Limits should be maintained at all times and access to inspect and maintain such apparatus must not be restricted. NGET will require protective provisions to be included within the draft Order which refer to existing and future infrastructure to ensure that its interests are adequately protected and to ensure compliance with relevant safety standards. NGET notes that the Applicant has included protective provisions for its benefit and will undertake a full review. The protective provisions that NGET requires will align with those provisions granted under the Awel Y Môr Offshore Wind Farm DCO, the Byers Gill Solar DCO and the Mona Offshore Wind Farm DCO.	As noted above, the **draft Development Consent Order [APP-016]** contains draft Protective Provisions for the benefit of NGET. The Applicant is progressing discussions with NGET in respect of the form of Protective Provisions to be contained within the final DCO.
NGET-014	Consultation and Engagement	Stakeholder Engagement	There has been limited engagements so far but NGET welcomes engagement with the Applicant to better understand how the Applicant's works, when delivered pursuant to the Order (if	The Applicant notes this comment.

			made), will ensure protection for those NGET assets which will remain in situ and those proposed, along with facilitating all future access and other rights as are necessary to allow NGET to properly discharge its statutory obligations.	
NGET-015	Description and DCO Process	Protective Provisions	NGET will keep the Examining Authority updated in relation to these discussions. NGET reserves the right to make further representations as part of the Examination process in relation to specific interactions with any NGET assets or projects identified during the Examination process, and as negotiations continue, and in respect of the Protective Provisions.	The Applicant notes this comment.

3.10 British Horse Society (Wiltshire Access Team)

Table 3-10 RR-4647

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response

BHS-001	Description and DCO Process	Introduction	This response is made on behalf of the British Horse Society Wiltshire Access team. The British Horse Society (BHS) seeks to represent the interests of horse riders using off-road rights of way: bridleways, restricted byways and byways. BHS Wiltshire Access team has previously responded to the consultation in detail. Below is a summary of our position.	The Applicant notes this comment.
BHS-002	Description and DCO Process	Objection	BHS Wiltshire Access Team object to the Lime Down Solar Farm proposal.	The Applicant notes this comment.
BHS-003	Description and DCO Process	Principle of Development	This is a proposal for a mega industrial estate in the middle of a rural area, significantly affecting daily life in a number of communities. It is supported by moral appeals related to renewable energy and provisions for ecology and wildlife, but is first and foremost a business investment from which its non-British backers hope to profit substantially. They will not care what the local effects are as long as the scheme gets the go ahead. Such a proposal therefore calls for a very detailed scrutiny of all its claims, given the devastating nature of its impact on the local area.	The Applicant is confident that the assessment of the Scheme set out in the **ES [APP-052 to APP-265]** comprehensively and robustly assesses the level of effect of the Scheme on the physical and ecological environment, and on the economic and social conditions in the areas and population affected by the Scheme. The assessment has identified proposed management and mitigation measures that ensures the Scheme aligns with national and local planning policy and industry guidance. Chapter 8 of the **Planning Statement [APP-267]** contains an appraisal of the Scheme against national and local planning policy. Furthermore, a detailed appraisal of the Scheme against

				national and local policy is set out in Annex A: National Policy Accordance Tables and Annex B: Local Policy Accordance Tables of the **Planning Statement [APP-267]**. All mitigation measures proposed in the ES are secured through the suite of management plans documents secured by the Requirements in Schedule 2 to the **draft Development Consent Order [APP-016]**. If consented, the DCO becomes a a statutory instrument, and thus failure to comply with, or breach of, any of the Requirements is a criminal offence.
BHS-004	Socio-Economics, Tourism and Recreation	PRoW Use and Desirability	Riders (and cyclists and walkers, who also use bridleways and restricted byways) are looking for safe, preferably off-road routes to use for exercise and enjoyment in a pleasant tranquil environment. The proposed Lime Down Solar Park affects a large rural area offering the above amenities to PROW users. It is now threatened with industrial use, given the intended scale of the development. If this scheme goes ahead, the public rights of way (PROWs) associated will suffer very significant damage to their current state as quiet rural off-road routes.	The Applicant confirms that impacts to PRoW, unsurfaced roads, and the recreational use of the highway network have been assessed **in ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068**] and the **supporting ES Volume 3 Appendix 16-2 Tourism and Recreation Receptor Tables [APP-241**]. Consideration of the likely impact on views, character and the desirability of these routes to users has been fundamental to the assessment of likely significant effects. The Applicant confirms that the majority of significant adverse effects can be mitigated, however understands that some significant adverse effects to users of routes in Lime Down E cannot be mitigated further during construction.

BHS-005	Socio-Economics, Tourism and Recreation	PRoW Use and Desirability	They will become routes flanked by high fences and video cameras, running through acres of solar panels.	Fencing is not proposed within 15 m of the centreline of existing PROWs. The majority of site fencing is to consist of 2 m deer stock fencing as per the descriptions provided in **ES Volume 1, Chapter 3: The Scheme [APP-055].** This is to control large mammalian movements and provide a visual deterrent to entering the Solar PV Array areas, whilst maintaining a more open aspect for PROW users. CCTV cameras for site security are only proposed to be located on the fenced boundary of the Solar PV Arrays and directed to look along the boundary or into the Site, not at PROW users.
BHS-006	Socio-Economics, Tourism and Recreation	PRoW Use and Desirability	If this proposal goes ahead, use of PROWs outside the areas of solar panels will also be badly affected, an unacknowledged but inevitable result of the change of state from rural to industrial of the Lime Down scheme area. Users will be inclined not to use PROWs that, although untouched by the development itself, nonetheless lead into or between the arrays of solar panels. This means that in fact the impacted area of PROWs far exceeds that of the study area of the scheme.	The Applicant confirms that impacts to PROWs, unsurfaced roads, and the recreational use of the highway network have been assessed **in ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** and the **supporting ES Volume 3 Appendix 16-2 Tourism and Recreation Receptor Tables [APP-241]**. This has included routes directly affected by the Scheme, and those affected by views towards the Scheme, or by the potential for HGV or Scheme traffic movements on connecting highways. Other PROWs within a 2 km Zone of Influence were reviewed for their likelihood to be affected by the Scheme. Those with neutral or negligible impacts were not assessed further.

BHS-007	Transport and Access	Impacts to Local Road Network	Further, the road network in each area of the scheme does not operate in isolation. Lanes and minor roads link the bridleways and byways in the five areas together. Much as they would like to, riders, cyclists and walkers cannot confine themselves to off-road bridleways and byways. They have to make use of quiet lanes to travel to off-road routes. The significant impact of this scheme on the use of local lanes and minor roads, which are just as important a part of the ridden, cycled and walked PROW network, is not properly considered by the developers.	Impacts on the specific highway links have been assessed in **ES Chapter 13: Transport and Access [APP-065]** to quantitatively assess the likely impact of additional HGV or worker movements on the highway network. This has been considered in **ES Chapter 16 Socio-Economics, Tourism and Recreation [APP-068]** as a means to understand likely effects on recreational highway users on the highway network overall. This receptor has been assessed as an overall receptor rather than specific highway links due to the interconnected nature of highway routes and their use in connecting PROWs over a wider area. The Applicant is confident that the assessment has been carried out robustly and is confident that there are no significant adverse effects anticipated to recreational or non-vehicular highway users.
BHS-008	Socio-Economics, Tourism and Recreation	PRoWs	From the point of view of riders and PROW users in this rural area, anything that significantly detracts from their safe enjoyment of PROWs is 'Major' and 'Significant', no matter what conclusions the developer's assessment methodologies arrive at, or how unimportant the degraded 'desirability' of all the locals' and tourists' rights of way may be considered (by a foreign developer). See below* *'The Scheme, through its design and embedded mitigation, preserves the routing and access of all existing	The assessment methodology for determining impacts on PROWs has been derived from professional guidance from ISEP (previously IEMA) on the application of sensitivity and magnitude criteria for environmental effects. The Applicant is confident that this approach is robust and the application of sensitivity and magnitude criteria has been proportionate to the likely impacts the Scheme would have on PROWs at each assessed phase.

			PROWs on the Solar PV Sites and in the Cable Route Search Corridor throughout the operational lifetime of the Scheme except during times of infrastructure replacement. During this time, impacts are expected to be no greater than those anticipated during construction. As a result, anticipated long-term impacts on PROWs and recreational routes during the general operational and maintenance period are experiential in nature: IMPACTING ONLY ON THE DESIRABILITY OF THE PROW OR RECREATIONAL ROUTES AS A RESULT OF CHANGES TO LANDSCAPE SETTING AND VISUAL ASPECT, NOT THEIR ACCESSIBILITY OR USE.'	

BHS-009	Socio-Economics, Tourism and Recreation	PRoW Impacts	On balance the impact of the development for riders and all off-road users is overwhelmingly negative, both during construction and over the operating life of the Scheme, and, if it should ever happen, decommissioning.	The **Outline Public Rights of Way and Permissive Path Management Plan [APP-282]** provides measures to manage the PRoW network affected by the temporary construction period. The decommissioning phase is also temporary with similar effects as the construction period. During operation Lime Down would generate a low level of vehicle trips with little to no impact The Applicant confirms that impacts to users of PROWs and unsurfaced roads in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** and the supporting **ES Volume 3 Appendix 16-2 Tourism and Recreation Receptor Tables [APP-241]** broadly identify adverse effects, however the Applicant reiterates that the majority of these are able to be mitigated so they are not significant adverse effects. The Applicant also seeks to highlight that during the operational lifetime of the Scheme, permissive paths, including those for equestrians and cyclists, are proposed across the Solar PV Sites to improve accessibility and connectivity across the PROW network. These are shown **on ES Volume 2, Figures 3-4-1 to 3-4-5.2 Landscape and Ecology Mitigation Plans [APP-084]** and secured through the **OLEMP [APP-283].** This is secured through the detailed design stage by Requirements 5 and 7 in Schedule 2 to the **Draft DCO [APP-016].**

BHS-010	Transport and Access	Construction Traffic	They will be subjected to two years of construction traffic, on local roads, on the approaches to what were previously tranquil bridleways. This will take place five and a half days a week. No body, apart from the determined, will attempt to use any of these routes for two years.	The **Outline Public Rights of Way and Permissive Path Management Plan [APP-282]** provides measures to manage the PRoW network affected by the temporary construction period. No Bridleways are proposed to be stopped up during construction. The Applicant confirms that the assessment of impacts to PROWs, unsurfaced roads, and the recreational use of the highway network during construction in **ES Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** and the **supporting ES Volume 3 Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]** take into account the construction duration, and the impact on accessibility to the PROW network and its desirability for users. The Applicant is confident that the majority of these are able to be mitigated so they are not significant adverse effects. This includes keeping PROWs open as much as possible during construction to ensure those who do use the PROWs are not physically hindered from doing so.

BHS-011	Landscape and Visual	PRoW Experience	Post-construction, the vast majority of routes will yield only views of field after field of 3.5m solar panels. Mitigation by way of natural screening, even if possible, will take many years to achieve and will never reproduce current conditions. • This industrialisation of a rural landscape will in all likelihood permanently and significantly damage the experience of users of rights of way into and over the scheme area and result in little use, possibly causing the developer to slacken any efforts to keep rights of way open, and may result in claims that PROWs over the site are not in fact valued or needed.	The Applicant has assessed the likely impact on the long-term desirability of PROWs and unsurfaced roads to users and considers there is not anticipated to be any significant adverse effects, as assessed in **ES Chapter 16 Socio-Economics, Tourism and Recreation [APP-068]** and the supporting **ES Volume 3 Appendix 16-2 Tourism and Recreation Receptor Tables [APP-241]**. Whilst the user experience will be different to current conditions, the planting of landscape and ecological mitigation, and the provision of permissive paths to improve connectivity is anticipated to go a substantial way to improve user experience and maintain the number of users of the affected PROWs. The Applicant is committed to ensuring PROWs are kept to a good standard throughout the Scheme's operational lifetime, as maintenance of public rights of way within land under freehold acquisition by the Applicant is their responsibility to maintain, and is secured through the **OPROWPPMP [APP-282]** by Requirement 16 in Schedule 2 to the **Draft DCO [APP-016]**. The Applicant understands the importance of PROWs for recreation and their benefit to physical and mental wellbeing, and at no point in the Scheme's lifetime are PROWs permitted to be closed indefinitely: all closures must be time-limited and necessary for works to be carried out (such as during construction or decommissioning).

BHS-012	Socio-Economics, Tourism and Recreation	Rural Amenity	BHS Wiltshire has previously remained neutral on some smaller-scale solar array development applications in Wiltshire where useful off-road route enhancements were offered by the developer. However in the case of Lime Down it is difficult to see how any of the permissive routes offered by the applicant could compensate for the massive loss of rural amenity involved in this application.	The Applicant acknowledges that the scale of the Scheme is greater than other consented solar developments in Wiltshire. However, with that, comes far greater opportunity for improvements and mitigation to reduce effects on rural amenity. The Applicant has committed to landscape and ecological mitigation including the planting of native species hedgerows and trees to support existing vegetation on field boundaries, and providing specific habitat improvements to field edges, groundcover planting, and riparian corridors along waterways. Furthermore, the Applicant has committed to the provision of permissive paths around the Solar PV Array Sites to improve countryside access. These measures are secured through detailed design and the **OLEMP [APP-283]** by Requirements 5 and 7 in Schedule 2 to the **Draft DCO [APP-016]**.

3.11 Wiltshire Bridleway Association

Table 3-11 RR-4932

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
WBA-001	Socio-Economics, Tourism and Recreation	Bridleways, PRoW and Equestrian Impacts	The two areas that WBA is particularly concerned about are the area south east of Sherston and the area south west of Rodbourne. The Sherston area is bordered at the eastern end by a bridleway (SHER14) and also has a bridleway (SHER16) going through the middle of the section north east of Lordswood Farm. The Rodbourne area has a bridleway (MALW54) going through the northern section and has bridleways (MALW59, MALW61 and SSTQ4) going round and through the south western section. In addition GSOM9, which becomes SEAG23, touches the south eastern corner of this area.	The Applicant confirms that this matter is addressed in detail in the Applicant's responses set out below.
WBA-002	Socio-Economics, Tourism and Recreation	Bridleways, PRoW and Equestrian Impacts	WBA is concerned that all these bridleways will become unusable both during and after construction were permission given for the Lime Down Solar Park to be built. A bridleway is a Public Right of Way for the use of equestrians, cyclists and walkers.	The Applicant confirms that this matter is addressed in detail in the Applicant's responses set out below.

WBA-003	Socio-Economics, Tourism and Recreation	Bridleways, PRoW and Equestrian Impacts	I understand that it is proposed that 4.5m tracking panels are to be used in this project and we would be interested to know how it is intended to make it safe for horses to continue to use the bridleways once the panels were up and running.	The Applicant confirms that this matter is addressed in detail in the Applicant's responses set out below.
WBA-004	Description and DCO Process	Objection	WBA objects strongly to the construction of the Lime Down Solar Park. This response is made on behalf of Wiltshire Bridleways Association.	The Applicant notes Wiltshire Bridleways Associations Representation. Please see the responses to detailed points below.
WBA-005	Socio-Economics, Tourism and Recreation	Bridleways, PRoW and Equestrian Impacts	WBA objects strongly to the construction of Lime Down Solar Park. The potential effect of solar farms on horses should be considered on any route used by them — including byways, restricted byways, bridleways, roads (including unclassified roads) and permissive routes — and on equestrian businesses where horses are kept or trained. Horse Riders, along with walkers and cyclists, are classed as vulnerable road users and consequently any development that threatens safe off-road riding routes, and which may force riders on to public roads is of major concern.	The assessment in **ES Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** and the supporting **ES Volume 3 Appendix 16-2 Tourism and Recreation Receptor Tables [APP-241]** have assessed the likely impacts of the Scheme at construction, operation, peak replacement, and decommissioning on all public rights of way, unsurfaced highways, the local highway network, and any permissive routes made known to the Applicant. Equestrian facilities including both private facilities and business have also been individually assessed. Residual significant adverse effects are only assessed as likely to occur during construction, to bridleway MALW54, the unsurfaced roads in Rodbourne used to access Lime Down E, and the equestrian facilities at Park Farm, Yatton Keynell.

				The **Outline Public Rights of Way and Permissive Path Management Plan [APP-282]** provides measures to manage the PRoW network affected by the temporary construction period. No Bridleways are proposed to be stopped up during construction.
WBA-006	Socio-Economics, Tourism and Recreation	Bridleways, PRoW and Equestrian Impacts	The Lime Down Solar Park is a rural area threatened with industrial use. Given the intended scale, the rural public rights of way (PROWs) associated with it will therefore suffer very significant change from their current state as quiet off-road routes. Without comprehensive mitigation the effects of the development of each and every one of the Solar Parks as well as the Cable Corridors will have significant negative impacts on the use of the PROWs in those areas.	The **Outline Public Rights of Way and Permissive Path Management Plan [APP-282]** provides measures to manage the PRoW network affected by the temporary construction period. No Bridleways are proposed to be stopped up during construction.

WBA-007	Socio-Economics, Tourism and Recreation	Bridleways, PRoW and Equestrian Impacts	Riders will be reluctant to ride in narrow corridors, flanked by high fences and video cameras, running through acres of solar panels. The ability to fully enjoy the off-road environment will be lost, as will their views of the open countryside.	The Applicant has responded to the specific comments made by Wiltshire Bridleway Association below. The **Outline Public Rights of Way and Permissive Path Management Plan [APP-282]** provides measures to manage the PRoW network affected by the temporary construction period. No Bridleways are proposed to be stopped up during construction.
WBA-008	Socio-Economics, Tourism and Recreation	Bridleways, PRoW and Equestrian Impacts	PROWS outside of the areas of Solar panels will be similarly affected. Riders will be inclined not to use PROWs untouched by the development itself but which lead into or between the farms. This means that in all likelihood the impacted area geographically far exceeds the 2000 acres of the Solar Park.	The assessment **in ES Chapter 16 Socio-Economics, Tourism and Recreation [APP-068]** and the supporting **ES Volume 3 Appendix 16-2 Tourism and Recreation Receptor Tables [APP-241]** have assessed the likely impacts of the Scheme on a 2 km Zone of Influence surrounding the Scheme, which extends to a 5 km Zone of Influence for regionally or nationally important tourism and recreation receptors.
WBA-009	Socio-Economics, Tourism and Recreation	Bridleways, PRoW and Equestrian Impacts	Mitigation measures common to all proposals for developments of Solar Farms that impact PROWs and other routes used by horse riders (and carriage drivers, where relevant) are described below. These measures include the provision of enhanced and additional routes in line with the National Planning Framework (NPPF) and Wiltshire Core Strategy Policy No 52. Without all these mitigation measures WBA objects to all parts of the development.	The Applicant has responded to the specific comments made by Wiltshire Bridleway Association below. Mitigation measures to protect all PROW users are set out in the **OCTMP [APP-287**] and **OPROWPPMP [APP-282**], secured respectively by Requirements 15 and 16 in Schedule 2 to the **Draft DCO [APP-016**].

WBA-010	Socio-Economics, Tourism and Recreation	Factors Which Could Affect Equestrians	1 Factors which could affect equestrians - 1.1 Construction 1.1.1 Traffic A traffic effect plan should be produced which should consider the safety of users of rights of way both on and adjacent to the site and on roads used in the locality. Traffic should be restricted by planning conditions to normal working hours, avoiding the early mornings, evenings and weekends when equestrians are most likely to be out. Bridleways, byways and unsurfaced roads should not be used for site access. If it is unavoidable, every effort should be made to ensure that the surface will be maintained and restored to a surface material suitable for horses after construction of the solar farm. An alternative route for equestrians should be provided during construction to minimize conflict.	As set out in the **oCTMP [APP-287]** a booking system will be set up to manage arrivals and departures to the Site. This will prevent HGVs generated by the Scheme passing each other in opposite directions on the local roads forming part of the construction routes (including this route) and will be confirmed as part of the final CTMP. The **oCTMP [APP-287]** includes measures to manage deliveries and restricted hours of deliveries outside of peak hours in order to minimise any detrimental impacts on the local highway network. Access to the Solar PV Sites via PRoW and unsurfaced roads have been avoided where feasible. Unavoidable instances have been required at BOAT SHER37 (<100 m) to access Lime Down B, at Down Road to access Field D17, and bridleway MALW54 and connected unsurfaced roads to access Lime Down E. Where used for construction movements, all route surfaces will be restored to their existing material following completion of construction activities. Restoration of surfaces disturbed by construction movements on unsurfaced highways, and public rights of way are respectively secured through the **oCTMP [APP-287]** and **oPRoWPPMP [APP-282]** by Requirements 15 and 16 of Schedule 2 to the **Draft Development Consent Order [APP-016]**.

				The Applicant has committed to providing a parallel, segregated diversion route for equestrians and cyclist on bridleway MALW54 during construction to minimise conflicts with HGVs. The **oPRoWPPMP [APP-282]** provides measures to manage the PRoW network affected by the temporary construction period. No Bridleways are proposed to be stopped up for the duration of construction.
WBA-011	Socio-Economics, Tourism and Recreation	Factors Which Could Affect Equestrians	1 Factors which could affect equestrians - 1.1 Construction 1.1.2 Closure of bridleways or byways Closures without alternative routes should be avoided and, if necessary, construction traffic managed to reduce the length of closures, rather than an	Closures of PROWs are to be avoided where possible. Diversions lasting the full construction period are proposed only for bridleway MALW54, footpath MALW55, and footpath GRIT20. Where closures are required, these will be given suitable notice for user awareness, and a suitable on-site diversion or alternative route will be

			automatic blanket closure throughout the period of construction.	provided or signposted. Where a diversion cannot be feasibly provided, such as on the Cable Route Corridor, works required to cross the affected PROW will be prioritised for night-time work, or scheduled to minimise the closure period. The **oPRoWPPMP [APP-282]** provides measures to manage the PRoW network affected by the temporary construction period. No Bridleways are proposed to be stopped up for the duration of construction.
WBA-012	Socio-Economics, Tourism and Recreation	Factors Which Could Affect Equestrians	1 Factors which could affect equestrians - 1.1 Construction 1.1.3 Surfaces Trenches for cables should not cross or be laid along rights of way. If it is unavoidable, authorization will be required from the Highway Authority to disturb the surface of the right of way. The surface must be reinstated to a firm and safe condition within a set period, which should be as short as possible to minimize inconvenience to users. If the surface is not reinstated, Wiltshire Council must restore it and charge the cost to the landholder. The finish must be one that is suitable for horse use.	Cable trenches are proposed to cross PROWs, with the exception of locations where the Applicant has specifically committed to a trenchless technique (usually associated with major roads or watercourse crossings). Detail design of cable trenching will be submitted to Wiltshire Council (including in their role as highway authority) for approval. Closures of PROWs for cable trenching will be scheduled to minimise the amount of time the closure is in place. Where feasible to do so, such as on Solar PV Sites, a diversion route may also be instated during the PROW closure. The surfaces of all PROWs affected by cable trenching will be reinstated in full following completion of works, to the same material as existing. These measures are set out in the **OCTMP [APP-287]** and **OPROWPPMP [APP-282]**, secured respectively by Requirements 15 and 16 in Schedule 2 to the **Draft DCO [APP-016]**.

WBA-013	Socio-Economics, Tourism and Recreation	Factors Which Could Affect Equestrians	1 Factors which could affect equestrians - 1.1 Construction 1.1.4 Noise Noise from construction may be disturbing, particularly pile-driving and trench-digging. Noise-attenuating fencing is available and may help. Its provision along a bridleway could be a condition of planning consent.	The noise and vibration impacts arising from construction activities are assessed in Section 14.10 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**. Noise barriers are most effective close to the source of the noise, and these are listed as mitigation measures around noisy activities where appropriate, such as during horizontal directional drilling. All mitigation measures are committed to through the **Outline Construction Environmental Management Plan [APP-277]**. With these measures in place, the assessment concludes that no significant effects from construction noise or vibration are expected. A noise monitoring programme agreed with Wiltshire Council will be carried out during construction. The preparation, approval and implementation of the Construction Environmental Management Plan, substantially in accordance with the **Outline CEMP [APP-277]**, is secured through Requirement 13 in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that construction noise and vibration are appropriately controlled.

WBA-014	Socio-Economics, Tourism and Recreation	Factors Which Could Affect Equestrians	1 Factors which could affect equestrians - 1.1 Construction 1.2 Drainage Drainage provision for the radically changed surface of a solar farm compared with greenfield land must be taken into account to prevent potentially serious detrimental effects on equestrian routes on and immediately adjacent to the site and for some distance away, depending on drainage patterns, outflow and the terrain. Hard surfaces create a very different drainage situation from an open field as run-off is immediate and much higher in volume. The extensive surface area of the panels could significantly change the nature of the drainage. Existing drainage may not be adequate to cope with the changed run-off and holding ponds may be required. New drainage to protect equestrian routes is essential to ensure they are not affected. This must be considered well beyond the site itself so that flash flood damage does not occur. The effect of the construction process and vehicular access should also be considered. Levelling a site, soil stripping, trenching for cables, compaction and creating access tracks will all affect the drainage of the site and should be carefully provided for in the construction phase so that there is no adverse effect on equestrian routes. Hard surfacing routes which currently have an adequate natural surface should not be the automatic answer; it is usually	In relation to surface water drainage, the Applicant does not agree that the Scheme would result in significantly changed runoff or inadequate drainage that could affect equestrian routes. The assessment in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [APP-063]** distinguishes between solar PV arrays, where panels are elevated and allow rainfall to drain to ground beneath and between arrays maintaining existing drainage pathways, and supporting infrastructure such as substations and BESS, where engineered drainage with attenuation is provided. National policy recognises that ground-mounted solar PV generally drains to ground and does not create significant drainage impacts where ground cover is maintained (NPS EN-3 paragraph 3.10.75). The introduction of permanent grass cover and elimination of trafficking beneath panels improves infiltration capacity relative to the existing arable baseline, and the assessment concludes that the Scheme would not result in increased runoff rates, volumes or adverse off-site drainage impacts. Construction-phase drainage controls to maintain existing pathways and prevent sedimentation are secured through the **Outline Construction Environmental Management Plan [APP-277]**, with detailed measures approved through Requirements in the **Draft Development Consent Order [APP-016]**. The assessment demonstrates that existing drainage patterns would be maintained and that flash flooding

			better to preserve the existing surface by attention to drainage. However, the existing surface and potential future use should be taken into account and the opportunity for upgrading the surface with a finish suitable for horse use should be taken if appropriate.	would not occur as a result of the Scheme. As the Scheme is not anticipated to have any significant effects on hydrology and drainage, this has not been considered as a factor in the assessment of impacts to PROWs and recreational routes available to equestrians or to dedicated equestrian facilities in **ES Volume 3 Appendix 16-2 Tourism and Recreation Receptor Tables [APP-241].**

WBA-015	Socio-Economics, Tourism and Recreation	Factors Which Could Affect Equestrians	1 Factors which could affect equestrians - 1.1 Construction 1.3 Fencing If bridleways or byways are alongside or through sites, care must be taken not to create a narrow corridor. Fencing can be intimidating, especially at this height, and create a need for vegetation control. It is not safe to fence users into too narrow a corridor, particularly for a length of more than a few yards. The need to maintain adjacent hedges and surface vegetation so as not to further reduce the available width should also be considered as well as vehicular access for maintenance if appropriate. A minimum width of 4m is required, preferably 5m, irrespective of any recorded width of the right of way, with vegetation cut through the full width. Where a bridleway or byway has been previously unfenced, it is likely that the used width has been at least 4m as users do not risk passing each other more closely than necessary, particularly on multi-use routes where horses, bicycles, pedestrians and dogs may be involved. Use of open mesh fencing is preferable to close boarding or metal palisade-type fencing with sharp points on top. The latter two are much more intrusive in the landscape so should not be permitted in a rural location; they also create unpleasant and intimidating alleys, even if relatively wide, in any location. Metal palisade fencing with spikes on top should be avoided as its rigidity and sharp edges are very dangerous and have safety	Fencing is not proposed within 15 m of the centreline of existing PROWs. Where PROWs run alongside existing or proposed hedgerows, these will only be to one side of the PROW to maintain open aspect and passing space on the opposite side. Only PROWs or unsurfaced roads that are hedge-lined on both sides will be maintained as such. A minimum surface width of 3 m is proposed for bridleways, as recommended by guidance from the British Horse Society. However, only groundcover planting will be planted alongside PROWs, allowing users to pass at a greater width if required. The majority of site fencing is to consist of 2 m deer stock fencing. This is to control large mammalian movements and provide a visual deterrent to entering the Solar PV Array areas. Metal palisade fencing is only proposed in locations where there is a danger to life, and so is limited to substation and BESS enclosures. Palisade fencing is not proposed adjacent to PROWs. Where PROWs run adjacent to substations, these are separated by existing hedgerows, which will be strengthened, and palisade security fencing will only be located on side of the hedgerow facing the substation infrastructure. This therefore removes the risk of PROW users such as equestrians being within an unsafe distance of this type of fencing. Solar PV Panels are to be located no less than 15 m from existing PROWs.

			implications for riders. While it may be over head height for a pedestrian, its top is likely to be below chest height for a rider and very serious injury is likely should a rider be thrown onto or against such a fence. We understand that it is proposed that 4.5m tracking panels are to be used in this project and we would be interested to know how it is intended to make it safe for horses to continue to use the bridleways once the panels are up and running.	This should help to provide enough physical separation that horses are less likely to be spooked by onsite infrastructure. The Scheme proposes single-axis tracker panels up to 4.5 m tall. These rotate very slowly (approximately 15°-20° per hour during normal tracking), and incrementally (every few minutes rather than constantly) for energy efficiency. This should also reduce the amount to which horses are spooked by onsite infrastructure, as movements are small and noise from motors will not be significant. These principles (including offsets to PROWs, PROW widths, and fencing and PV types), are set out in the **Design Principles and Parameters [APP-269]**, and indicatively shown on the **ES Volume 2 Figures 3-4-1 to 3-4-5.2 .2 Landscape and Ecology Mitigation Plans [APP-081]**. Information on PROW management is found in the **OPROWPPMP [APP-282]**, while information on fencing types and construction are set out in **ES Volume 1, Chapter 3: The Scheme [APP-055]**. All details of the Scheme are subject to the relevant Requirements in Schedule 2 the **Draft Development Consent Order [APP-016]**, which require detailed design and management plans to be authorised by the relevant local authority. The specific requirements for the features set out in this response are:

				• Requirement 5: Detailed design approval; • Requirement 7: Landscape and ecological management plan; • Requirement 10: Fencing and other means of enclosure; • Requirement 13: Construction environmental management plan; and • Requirement 16: Public rights of way and permissive paths.

WBA-016	Socio-Economics, Tourism and Recreation	Factors Which Could Affect Equestrians	1 Factors which could affect equestrians - 1.1 Construction 1.4 Security There may be a wish to restrict vehicle access to the site to minimize theft or vandalism. Anti-vehicle barriers cannot be authorized on bridleways or byways for the purpose of security, only to control livestock or to safeguard users of the right of way. The site must therefore only be permitted if it can be secured without affecting bridleways, byways or roads. On permissive paths, barriers should conform to BHS Advice on Gaps, Gates and Vehicle Barriers (Redacted) to ensure safety of users.	Control of vehicles for site security is to be largely achieved through reinforcing hedgerows as natural barriers, and providing gated access points to secure areas. PROWs are not proposed to be located within 'secure' areas and so are only to be controlled where there is potential for livestock to be present on adjacent land. This is demonstrated on the **ES Volume 2 Figures 3-4-1 to 3-4-5.2 .2 Landscape and Ecology Mitigation Plans [APP-081]** and secured in principle by the **Design Principles and Parameters [APP-269]**. Both of these documents are subject to detailed design being approved as secured through Requirements 5 and 7 of Schedule 2 to the **Draft Development Consent Order [APP-016]**. On PROWs and on proposed permissive paths, gaps are preferred, with any gates conforming to guidance from Wiltshire Council and BHS. This is set out through the **OPROWPPMP [APP-282]**, secured by Requirement 16 in Schedule 2 the **Draft Development Consent Order [APP-016]**. Treatment of specific gaps, and barriers on PROWs are under discussion with Wiltshire Council and are to be discussed and agreed through a **Statement of Common Ground**.

WBA-017	Socio-Economics, Tourism and Recreation	Factors Which Could Affect Equestrians	1 Factors which could affect equestrians - 1.1 Construction 1.5 Alternative or Additional Access Large developments such as this are opportunities for increasing access, particularly those which contribute to community funds. There may be chance to upgrade a footpath to bridleway or to gain an additional route. Even very short links can have important effects by enabling greater or safer use of existing routes in an area. The National Planning and Policy Framework (NPPF) is the government's planning policy for England. The Wiltshire Core Strategy is a document that sets out the vision and policies for the development of land in Wiltshire until 2026. The NPPF and the Wiltshire Core Strategy for a local development framework both provide specific guidance on planning policy and decision-making regarding the effects of development on public rights of way: The PPG should also be taken into account as it carries the same weight as the NPPF. Planning policies and decisions should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users, for example by adding links to existing rights of way networks including National Trails.' (NPPF paragraph 105) Wiltshire Core Strategy should also be taken into account. This states within policy number 52: Development shall make provision for the retention and	The Applicant has committed to providing permissive paths as part of the Scheme on the Solar PV Sites. These include paths for pedestrians where linking public footpaths, and for equestrians and cyclists where linking bridleways. These are designated as Work No. 10 on the **Works Plan [APP-007]** and shown as on **ES Volume 2, Figures 3-4-1 to 3-4-5.2 [APP-084]**. These are secured through Requirements 7 and 16 of Schedule 2 to the **Draft DCO [APP-016]**. Once implemented, permissive paths will be maintained to the same level as PROWs. The Applicant has worked with Wiltshire Council's PROW and Countryside Access Team to generate permissive path links that can generate the greatest public benefit, aiming to link together disjoined parts of the PROW network, or sections where using the public highway would be required. The Applicant is furthermore exploring means by which PROW infrastructure within the Order Limits can be repaired or improved, under direction from Wiltshire Council's PROW and Countryside Access Team. These are likely to be agreed at detailed design following development consent. The Applicant is also committed to providing a Community Benefit Fund for offsite works. This is not directly associated with the DCO and so is negotiated and agreed separately. That notwithstanding, Wiltshire Council have

			enhancement of Wiltshire's green infrastructure network, and shall ensure that suitable links to the network are provided and maintained. Where development is permitted developers will be required to: i. retain and enhance existing on site green infrastructure ii. make provision for accessible open spaces in accordance with the requirements of the adopted Wiltshire Open Space Standards iii. put measures in place to ensure appropriate long-term management of any green infrastructure directly related to the development iv. provide appropriate contributions towards the delivery of the Wiltshire Green Infrastructure Strategy v. identify and provide opportunities to enhance and improve linkages between the natural and historic landscapes of Wiltshire. If damage or loss of existing green infrastructure is unavoidable, the creation of new or replacement green infrastructure equal to or above its current value and quality, that maintains the integrity and functionality of the green infrastructure network, will be required. Proposals for major development should be accompanied by an audit of the existing green infrastructure within and around the site and a statement demonstrating how this will be retained and enhanced through the development process.	made representations demonstrating they are keen to see the Community Benefit Fund used in part to improve PROW conditions in the areas surrounding the Order Limits. Should local stakeholders, including Wiltshire Bridleway Association, seek further use of the Community Benefit Fund, then they are invited to engage with the Applicant following DCO consent to determine how the Community Benefit Find can be allocated.

			Development will not adversely affect the integrity and value of the green infrastructure network, prejudice the delivery of the Wiltshire Green Infrastructure Strategy, or provide inadequate green infrastructure mitigation. Green infrastructure projects and initiatives that contribute to the delivery of a high quality and highly valued multi-functional green infrastructure network in accordance with the Wiltshire Green Infrastructure Strategy will be supported. Contributions (financial or other) to support such projects and initiatives will be required where appropriate from developers. DEFRAS ROW circular 1/09 should also be taken into account , especially chapter 7 which deals with planning applications and PROW. Paragraph 7.1 states "*Proposals for the development of land affecting public rights of way give rise to two matters of particular concern: the need for adequate consideration of the rights of way before the decision on the planning application is taken and the need, once planning permission has been granted, for the right of way to be kept open and unobstructed until the statutory procedures authorising closure or diversion have been completed*" However, It should not be necessary to divert a bridleway or restricted byway (a byway open to all traffic cannot be diverted under normal circumstances) in this instance as arrays can be arranged around the route of this solar farm. If a diversion is deemed	

			unavoidable, this may be acceptable if it provides a more advantageous route, but not if is less convenient or commodious. Diversions should be avoided, unless the proposal is more desirable than the existing route as the solar farm is a temporary structure. If it is essential to divert a convenient route, consideration should be given to it reverting to the original line on expiry of the planning permission for the solar farm.	

WBA-018	Socio-Economics, Tourism and Recreation	Factors Which Could Affect equestrians	1 Factors which could affect equestrians - 1.1 Construction 1.6 Noise Inverter units may be noisy. They should be sited away from public access and sound-proofed. 1.7 Cable depth Horses are very sensitive to electricity. Where an equestrian route crosses or is close to buried cables, they should be buried at greater than 300mm depth (300mm is a common industry standard which is adequate except in the vicinity of horses). Leakage from buried cables is disturbing to horses, even in transit, they may refuse to step on the affected ground, or make sudden fast movements if they feel the charge. A faulty buried cable at Newbury racecourse electrocuted two horses. The sheer length of the proposed cable corridors means the development stands to affect many dozens, even hundreds, of PROWS. The surfaces of PROWS may only be disturbed with authorization from the Wiltshire Highways Authority. Where surfaces of PROWs are disturbed they must be restored to the condition prior to the disturbance. Cables running beneath PROWs and other equestrian routes should be at a depth significantly greater than 300 mm. 1.8 Visual Receptors In assessing the impact of proposed developments on visual receptors the developers should take in to account that on PROWs used by equestrians riders are looking at the landscape from a height significantly greater than that of a walker. On	Paragraph 4.1.2 of the **Outline Public Rights of Way and Permissive Paths Management Plan [APP-282]** commits to all Scheme infrastructure, including fencing, being at least 15 m away from any PRoW. This means that noise levels from inverter units with silencers would always be below 52 dB on PRoW. With reference to **ES Volume 3, Figure 2-4 Streets, Rights of Way and Access Plans [APP-080]** and **ES Volume 3, Figure 14-2 Daytime Operational Noise Contours [APP-160]**, operational noise associated with the Scheme would be between 20 and 52 dB on bridleways. These levels are below WHO guidelines on moderate community annoyance and are akin to the existing ambient sound environment in the area as evidenced by the baseline sound survey results given in Table 1 of **ES Volume 3, Appendix 14-3: Baseline Noise Survey [APP-236]**. As such the enjoyment of bridleways, and PRoW in general, with respect to the sound level experienced, is not expected to be significantly adversely affected by the operation of the Scheme. The **Outline Operational Environmental Management Plan [APP-278]** commits to noise levels from the Scheme being the same as or below those presented in Section 14.10 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]** and **ES Volume 3, Appendix 14-4: Noise Modelling [APP-237]**. Such levels

			PROWs in use by riders the height of the receptor should be at least 11 feet from the ground.	have been calculated on the basis that all BESS inverters will have silencer units, as stated in paragraph 14.9.12 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**. The helps ensure levels remain close to or below the existing background sound at sensitive receptors in the area. The preparation, approval and implementation of the detailed OEMP, substantially in accordance with the outline plan, are secured through Requirement 14 of Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring operational noise is appropriately controlled throughout the lifetime of the Scheme.
WBA-019	Socio-Economics, Tourism and Recreation	Factors Which Could Affect Equestrians	1 Factors which could affect equestrians - 1.1 Construction 1.9 Planting if very young hedges and saplings are planted, it may take several years before they provide visual screening. Therefore, planting should be of larger or semi-mature trees and shrubs.	It is recognised that new planting does take time to grow to provide screening. **ES Chapter 8 LVIA [APP060]** assesses the effects of the Scheme and its embedded mitigation at Year 1 and Year 15 to accommodate the growth rate. Although tall standard trees are proposed throughout the scheme to provide more instant screening, new hedgerow would be planted as s whips during their dormant season (winter) which reduces the risk of transplant shock, leading to a higher survival and establishment rates.

WBA-020	Socio-Economics, Tourism and Recreation	Proposed Access Improvements by Area	2 Proposed access improvements by area This section contains proposals for additional access in order to help the applicants meet their responsibilities, under NPPF and the Wiltshire Core Strategy, to compensate for the significant damage the proposal would do to the use of PROWs and to Recreational Amenity WBA would like to see links added that would help create "*circular*" routes, for example, by joining two bridleways.	The Applicant has committed to providing permissive paths as part of the Scheme on the Solar PV Sites. These include paths for pedestrians where linking public footpaths, and for equestrians and cyclists where linking bridleways. These are designated as Work No. 10 on the **Works Plan [APP-007]** and shown as on **ES Volume 2, Figures 3-4-1 to 3-4-5.2 [APP-084]**. These are secured through Requirements 7 and 16 of Schedule 2 to the **Draft DCO [APP-016]**.
WBA-021	Socio-Economics, Tourism and Recreation	Proposed Access Improvements by Area	2 Proposed access improvements by area Our proposals are as follows: 2.1 Lime Down A The Sherston area is bordered at the eastern end by a bridleway (SHER 14) and also has a bridleway (SHER 16) going through the middle of the north section west of Lordswood Farm. WBA is concerned that these bridleways will become unusable both during and after construction were planning permission given for Lime Down Solar Park to be built. We would like to see: i)Bridleway connecting SHER14 and SHER16 ii)A bridleway running west, then south, then west along the perimeter of the site from bridleway SHER14 to the Sherston road and continuing west of the road south, then east, then south along the perimeter of the site to	As shown on the **Works Plan [APP-007]** and on **ES Volume 2, Figure 3-4-1 [APP-084]**, the Scheme proposes three sections of permissive path for pedestrians, equestrians and cyclists that link bridleway SHER16 and the northern end of bridleway SHER14 via the road from Ladyswood to Bustler Hill. Further connection to SHER14 was not feasible as it lies on land outside the Order Limits, and is also legally a dead-end with respect to access for equestrians and cyclists.

			bridleway SHER16 just west of Lordswood Farm.	
WBA-022	Socio-Economics, Tourism and Recreation	Proposed Access Improvements by Area	2 Proposed access improvements by area 2.2 Lime Down B i) A bridleway from byway EGRE1 at the Norton Easton grey road running southwards following the northern edge of Lime Down B to the road just south of Foxley Green. ii) A bridleway starting at Fosse Farm following the southern and eastern edge of Lime Down B to the road, continuing across the road to join bridleway i) above at the eastern edge of the development. iii) A bridleway south from ii) at the Norton Easton Grey road following the edge of Lime Down B south and then east to Honey Lane, continuing along	As shown on the **Works Plan [APP-007]** and on **ES Volume 2, Figure 3-4-2 [APP-084]**, the Scheme proposes a permissive path for pedestrians, equestrians and cyclists that crosses the full extent of Lime Down B. In doing so, it links byway open to all traffic EGRE 1, byway open to all traffic SHER37 (also the Fosse Way), the Norton to Easton Grey road (at a farm gate between fields B8 and B9) and the northern section of Honey Lane, south of Foxley. It should be noted that for submission, fields B1-5 were removed from the Scheme, and as such, connection between Fosse Farm and Norton have not been possible within the Order Limits.

			the southern boundary of the area and then north to EGRE1 just south of Foxley Green.	
WBA-023	Socio-Economics, Tourism and Recreation	Proposed Access Improvements by Area	2 Proposed access improvements by area 2.3 Lime Down C i) A bridleway from BOAT SHER37 east along the southern perimeter of the solar farm, along the northern edge of Surrendell Wood and continuing along the boundary edge to Pig Lane. ii) A bridleway from SHER35 running east along the northern edge of LIME DOWN C round the southern edge of Lords Wood to connect to the Roman Road just south of SHER16. iii) A bridleway east from ii) to the railway tunnel following the southern and eastern edge of the farm to join byway SHER35 north of Cream Gorse.	i): A permissive path has not been able to be agreed in this location, due to constraints regarding landowners and watercourse crossings. ii): As shown on the **Works Plan [APP-007]** and across **ES Volume 2, Figures 3-4-3.1 and 3-4-3.2 [APP-084]**, the Scheme proposes a permissive path for pedestrians, equestrians and cyclists that crosses Lime Down C, linking byway open to all traffic LUCK57/SHER35 to the Fosse Way. iii): As shown on the **Works Plan [APP-007]** and across **ES Volume 2, Figures 3-4-3.1 and 3-4-3.2 [APP-084]**, the Scheme proposes a permissive path for pedestrians, equestrians and cyclists that crosses Lime Down C, linking byway open to all traffic LUCK57/SHER35 south of Cream Gorse to The Street, Alderton –

				north of the railway tunnel. Whilst not the same route as described by WBA, it performs a similar cross link through Lime Down C.
WBA-024	Socio-Economics, Tourism and Recreation	Proposed Access Improvements by Area	2 Proposed access improvements by area 2.4 Lime Down D i) Upgrade footpath HULL2 to a bridleway ii) A bridleway leading from i) along the edge of Lime Down D past Bradfield Wood, continuing east past footpath MALW50, then turning south to join footpath HULL6 and then to U/C 1113	The Scheme has not proposed redesignating any PROW. That notwithstanding, as shown on the **Works Plan [APP-007]** and across **ES Volume 2, Figure 3-4-4 [APP-084]**, the Scheme proposes a permissive path for pedestrians to link footpath HULL2 to HULL4, HULL5 and HULL6 next to the footbridge over Gauze Brook.

WBA-025	Socio-Economics, Tourism and Recreation	Proposed Access Improvements by Area	2 Proposed access improvements by area 2.5 Lime Down E The Rodbourne area has a bridleway (MALW54) going through the northern section and has bridleways (MALW59, MALW61, and SSTQ4) going round and through the south western section. In addition GSOM9, which becomes SEA23, touches the south eastern corner of this area. WBA is concerned that these bridleways will become unusable both during and after construction were permission for this solar farm be given the go ahead and we would therefore like to see the following additions to the PROW network: i) A bridleway running along the western edge of Lime Down E from bridleway MALW59 to bridleway SSTQ4. ii) A bridleway around the southern eastern and northern edges of Lime Down E on the eastern side of bridleway MALW61. This would connect to the unclassified road to Rodbourne and include a link in Seagry Wood to bridleway GSOM9.	Impact on the bridleways and unsurfaced road affected by Lime Down E have been assessed in **ES Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** and the supporting **ES Volume 3 Appendix 16-2 Tourism and Recreation Receptor Tables [APP-241]**. Therein it is recognised that there will be residual significant adverse effects to MALW54 and both unsurfaced highways due to diversions and use by HGVs during construction. Whilst mitigation measures as set out in the **OCTMP [APP-287]** and **OPROWPPMP [APP-282]**, secured respectively by Requirements 15 and 16 in Schedule 2 to the **Draft DCO [APP-016]**, are deemed to be sufficient to ensure user safety, the change of use and impact upon user experience are unable to be mitigated further. This however does not apply to GSOM9/SEAG23 which is outside the Order Limits and therefore is not likely to be significantly affected by the Scheme. i): A permissive path has not been able to be agreed to meet SSTQ4 in this location, due to constraints regarding landowners and watercourse crossings. That notwithstanding, as shown on the **Works Plan [APP-007]** and across **ES Volume 2, Figure 3-4-5.2 [APP-084]**, the Scheme proposes a permissive path for pedestrians to link bridleway MALW59 to footpath MALW62/SSTQ5 along the western boundary of Lime Down E. The Scheme proposes a separate permissive path

				for pedestrians, equestrians and cyclists that crosses Lime Down E, linking bridleways MALW59 and MALW61 centrally within Lime Down E. ii): A permissive path has not been able to be agreed in this location, due to connecting to routes outside the Order Limits, thus requiring third party private land to enact. This applies to the connection to the unclassified road at Rodbourne Bottom, and bridleway GSOM9/SEAG23. The Applicant is however aware of the route of an ancient 'drover's trail' between Rodborne Bottom and Seagry Wood following commentary from local stakeholders through the statutory consultation process. As such, this route has been left unobstructed by the Scheme to allow for this access to be maintained throughout the operational lifetime of the Scheme.

WBA-026	Socio-Economics, Tourism and Recreation	Bridleways, PRoW and Equestrian Impacts	If this proposal goes ahead, as a result of the very damaging change of state from rural to industrial use of the Lime Down area itself, use of PROWs outside of the areas of solar panels will also be adversely affected. Users will be inclined not to use PROWs that, although untouched by the development itself, nonetheless lead into or between the arrays of solar panels. This means that in fact the impacted area of PROWs far exceeds that of the Study Area of the Scheme.	The Applicant confirms that consideration of impacts to PROWs, unsurfaced roads, and the recreational use of the highway network has been assessed in **ES Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** and the supporting **ES Volume 3 Appendix 16-2 Tourism and Recreation Receptor Tables [APP-241]**. The Applicant confirms that the majority of significant adverse effects can be mitigated, however understands that some significant adverse effects to users of routes in Lime Down E cannot be mitigated further during construction. The assessment has considered the impacts to individual routes to build a picture of the likely impact on the overall PROW and highway network, determining that the overall effects within the 2 km Study Area is not a significant adverse effect at any stage of the Scheme. This is largely owing to the large number of PROWs and rural routes, given a great level of optionality to users, even in the presence of the Scheme.

WBA-027	Socio-Economics, Tourism and Recreation	Bridleways, PRoW and Equestrian impacts	Further, the road network in each area of the scheme does not operate in isolation. Lanes and minor roads link the bridleways and byways in the five areas together. Much as they would like to, riders, cyclists and walkers cannot confine themselves to off-road bridleways and byways. They have to make use of quiet lanes to travel to off-road routes. The significant impact of this scheme on the use of local lanes and minor roads, which are just as important a part of the ridden, cycled and walked PROW network, has not in our opinion been properly considered.	The impact on the highway network and PRoWS during construction, operation and decommissioning of the PV and cable routes sites has been considered in the **ES Volume 1, Chapter 13: Transport and Access [APP-065]** and in **ES Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]**. No significant effects to recreational and non-vehicular users of the public highway network have been identified. That notwithstanding, the assessment of individual PROWs in **ES Volume 3 Appendix 16-2 Tourism and Recreation Receptor Tables [APP-241]** has considered the likely effects of increased HGVs on connecting highways as a factor in the determination of likely significance of effect to individual receptors.
WBA-028	Decription and DCO Process	Executive Summary	The community values the site and the landscape, uses it and will be harmed if it is taken away. By classifying this as a nationally significant infrastructure project the government has in effect removed community input which allows Milliband to decide the fate of a huge swathe of the Wiltshire Countryside. We also believe that the cumulative impacts are skated over and not fully addressed in the report.	The Applicant also seeks to reaffirm that the assessment of effects to PROWs and recreational receptors takes into account the entirety of the Scheme at each assessed location (in some cases referred to as the in-combination effects) while cumulative effects from additional developments have also been assessed. These are set out in Section 16.13 of **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** and the supporting **ES Volume 3 Appendix 16-2 Tourism and Recreation Receptor Tables [APP-241]** (for construction and operational effects only). A comprehensive Cumulative and In-

				Combination Effects Assessment has been undertaken in accordance with Planning Inspectorate Advice Note 17 and the relevant NPS EN-1, NPS EN-3 and NPS EN-5 requirements which are set out within **ES Volume 1 Chapter 21: In-Combination and Cumulative Effects [APP-073]** and associated Appendices **[APP-264]**. Interaction with proposed or consented but not yet built developments has been fully explored within each of the technical assessments **[APP-059 - APP-072]** with a summary of each of these assessments provided within **ES Volume 1 Chapter 21 In-Combination and Cumulative Effects [APP-073]**. Existing schemes are captured within the baseline environment. The four stage cumulative assessment methodology is described within **ES Chapter 6 EIA Methodology [APP-058]**. 358 developments were included in the Long List **[APP-264]**. 41 developments are included in the short list (and are therefore assessed) including a number of proposed solar and BESS developments. The list of developments included in the cumulative assessment was reviewed and developed in consultation with Wiltshire Council. Taking a conservative worse case approach, significant cumulative effects are identified at a limited and discrete number of receptors comprising tourism and recreation impacts during the construction phase on Corsham Park, PRoW WT|CORM|122, long path and

				Sustrans Cycle Route 403, and on skylark at a District level. Lime Down Solar Park has an anticipated generating capacity of approximately 500 MW and therefore exceeds the 100 MW threshold for a Nationally Significant Infrastructure Project (NSIP). As a result, the Scheme is subject to the Planning Act 2008 and must be consented through a DCO, examined by the Planning Inspectorate on behalf of the Secretary of State for Energy Security and Net Zero, rather than determined by the local planning authority. A full description of the Scheme is provided in the **ES Volume 1, Chapter 3: The Scheme [APP-055].** The Applicant considers that the statutory consultation has been robust, thorough and undertaken in accordance with the requirements of the Planning Act 2008, the Environmental Impact Assessment (EIA) regulations, and the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009. The **Consultation Report [APP-022]** sets out the Applicant's approach to pre-application consultation. The Applicant also notes that the examination process provides a further opportunity for interested parties to comment on the Scheme. This examination is managed by an independently appointed Examining Authority. Further to this, the Applicant

				provided an extended relevant representation period beyond the minimum statutory timeframe to allow sufficient time for members of the public to review the submitted application documents and register as an interested party.

4 The Applicant's responses to other statutory consultees, undertakers and notable parties

4.1 UK Health Security Agency and Office for Health Improvements and Disparities

Table 4-1 RR-4798

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
UKHSA-001	Human Health	No additional comment	Thank you for your consultation regarding the above development. The UK Health Security Agency (UKHSA) welcomes the opportunity to comment on your proposals at this stage of the project. Please note that we request views from the Office for Health Improvement and Disparities (OHID) and the response provided is sent on behalf of both UKHSA and OHID. We can confirm that: With respect to Registration of Interest documentation, we are reassured that earlier comments raised by us on 12th March 2025 have been addressed. In addition, we acknowledge that the Environmental Statement (ES) has not identified any issues which could significantly affect public health. Following our review of the submitted documentation we are satisfied that the proposed development should not result in any significant adverse impact on public health. On that basis, we have no additional comments to make at this stage and can confirm that we have chosen NOT to register an interest with the Planning Inspectorate on this occasion.	The Applicant welcomes confirmation from the UKHSA that they are satisfied that the Scheme would not result in any significant adverse impact on public health.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			Please do not hesitate to contact us if you have any questions or concerns.	

4.2 Royal Mail

Table 4-2 RR-4123

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
RM-001	Transport and Access	Registration	Royal Mail Group Limited (RM) has no issue in principle with the Lime Down Solar Project, however on a practical level it is seeking to ensure that its road-based operations are not adversely impacted by construction traffic and any changes to local highway capacity during the scheme's construction phase. RM has six operational properties within 10 km of the proposed scheme boundary. These operational facilities rely on frequent use of the local road network on a daily basis. Accordingly, RM wishes to draw its operational obligations and requirements to the attention of both the Applicant and the Examining Authority. Furthermore, RM is registering as an Interested Party to reserve its position to make further representations at the Examination, if required.	The Applicant notes Royal Mail's operational facilities in proximity to the Scheme and the use of the local road network. The applicant welcomes continued consultation from Royal Mail. The potential effects of construction traffic on the local highway network are assessed in **ES Volume 1, Chapter 13: Transport and Access [APP-065]**, which considers construction vehicle movements, traffic volumes, road safety and effects on road users. This included the capacity of local roads and infrastructure to accommodate construction vehicles with consideration of construction traffic volumes, vehicle types, route suitability, and network performance. The assessment concludes that the level of construction traffic associated with the Scheme is unlikely to materially affect road safety on links within the Study Area, and no significant adverse effects on accident risk are anticipated. The assessment additionally concludes that with appropriate mitigation such as the CTMP in place, there would be no significant adverse impacts on the local highway network during the construction, operation and maintenance, and decommissioning phases of the Scheme.
RM-002	Transport and Access	Postal Operations	Under section 35 of the Postal Services Act 2011, RM has been designated by	The Applicant notes Royal Mail's duty as the Universal Postal

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			Ofcom as a provider of the Universal Postal Service. RM is the only such provider in the United Kingdom. The Act provides that Ofcom's primary regulatory duty is to secure the provision of the Universal Postal Service. Ofcom discharges this duty by imposing regulatory conditions on RM, requiring it to provide the Universal Postal Service. The Act includes a set of minimum standards for Universal Service Providers, which Ofcom must secure. The conditions imposed by Ofcom reflect those standards. RM's performance of the Universal Service Provider obligations is in the public interest and should not be affected detrimentally by any statutorily authorised project. Accordingly, RM seeks to take all reasonable steps to protect its assets and operational interests from any potentially adverse impacts of proposed development. RM's postal sorting and delivery operations rely heavily on road communications. It's ability to provide efficient mail collection, sorting and delivery to the public is highly sensitive to changes in the capacity of the highway network.	Service provider in the UK and understands the importance of the highway network. The potential effects of construction traffic on the local highway network are assessed in **ES Volume 1, Chapter 13: Transport and Access [APP-065]**, which considers construction vehicle movements, traffic volumes, road safety and effects on road users. This included the capacity of local roads and infrastructure to accommodate construction vehicles with consideration of construction traffic volumes, vehicle types, route suitability, and network performance. The assessment concludes that the level of construction traffic associated with the Scheme is unlikely to materially affect road safety on links within the Study Area, and no significant adverse effects on accident risk are anticipated. The assessment additionally concludes that with appropriate mitigation such as the CTMP in place, there would be no significant adverse impacts on the local highway network during the construction, operation and maintenance, and decommissioning phases of the Scheme. Construction vehicle movements will be managed through a Construction Traffic Management Plan. An **Outline Construction Traffic Management Plan (CTMP) [APP-287]** has been

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				prepared and submitted with the DCO application. The aim of the CTMP is to ensure that the effect of the construction phase on the local highway network is minimised. Cumulative effects have been assessed and reported within Section 13.13 of **ES Volume 1, Chapter 13 Transport and Access [APP-065].** Further, the TEMPro growth factor applied to establish the future baseline year also allows for increased future flows and, therefore, inherently takes into account those from permitted and allocated developments. No significant transport and access cumulative effects are identified. No changes to the **Outline CTMP [APP-287]** are proposed to be made in regard to cumulative effects because the mitigation and management measures included already take into consideration increased future traffic flows. The **Outline CTMP [APP-287]** sets out measures to coordinate construction deliveries by HGVs to arrive and depart between 09:30 and 16:30 where possible, to avoid peak network hours of 08:00–09:00 and 17:00–18:00. It also includes a community liaison element to keep local communities informed about the construction process and to provide a contact for feedback should any issues arise.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				Compliance with the CTMP will be monitored by the Developer, Contractor and Wiltshire Council as local highway authority. The preparation, approval and implementation of the final CTMP, substantially in accordance with the outline CTMP, are secured through Requirement 15 of Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring construction traffic impacts are appropriately managed throughout the construction phase of the Scheme.
RM-003	Transport and Access	Construction Impacts	RM is of the view that the construction phase of this scheme has potential to impact on its operational interests, especially when combined with any potential cumulative highways impact of other major developments in the surrounding area. In order to protect RM's position, it is requested that specific wording is added to the Framework Construction Traffic Management Plan (CTMP) for Lime Down Solar Project to secure the following mitigations for the benefit of RM: 1. the CTMP should include specific requirements that during the construction phase RM is notified by the Applicant or its contractors at least two months in advance on any proposed road closures / diversions / alternative access arrangements, hours	Article 16 (traffic regulation measures) of the **draft Development Consent Order [APP-016]** provides that, where the undertaker, proposes to prohibit or restrict the use of any road it must give 4 weeks' notice to chief officer of police and to the traffic authority. Notice but also be placed in one or more local newspaper 7 days before the undertaker exercises its powers under this Article. This is the primary mechanism through which users of the local road network are notified. The Applicant would need to understand any specific impacts on Royal Mail further in order to consider incorporating specific notification of Royal Mail in the oCTMP, noting that **ES Volume 1, Chapter 13: Transport and Access [APP-**

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			of working; 2. where road closures / diversions are proposed, the Applicant or its contractors liaise with RM at least two months in advance to identify and make available alternative highway routes for operational use, where possible; and 3. the potential for cumulative highways impact from other major developments in the surrounding area is fully addressed by the applicant. Any questions of RM should be sent to: Holly Trotman ((REDACTED)), Senior Planning Lawyer, Royal Mail Group Limited Daniel Parry-Jones ((REDACTED)) Director, BNP Paribas Real Estate	**065]** has not identified any significant effects on Royal Mail.

4.3 National Gas Transmission PLC

Table 4-3 RR-3423

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
NGT-001	Description and DCO Process	Introduction	Relevant Representation of National Gas Transmission Plc ("NGT") in respect of the Lime Down Solar Project DCO (the "Project" and the "Order") This Relevant Representation is submitted on behalf of NGT in respect of the Project, and in particular NGT's infrastructure which is within or in close proximity to the proposed Order limits for the Project (the "Order Limits").	The Applicant notes NGT's need for appropriate protection for its infrastructure in close proximity to the Scheme.
NGT-002	Description and DCO Process	Introduction	NGT's rights of access to inspect, maintain, renew and repair such apparatus must also be maintained at all times, and must not be restricted.	As noted above, Part 4 of Schedule 15 (given effect by Article 45 (Protective Provisions)) to the **draft Development Consent Order [APP-016]** contains draft Protective Provisions for the benefit of NGT which are intended to ensure that any exercise of powers affecting NGT's land, rights or assets is appropriately controlled. The Applicant is progressing discussions with NGT in respect of the form of Protective Provisions to be contained within the final DCO.
NGT-003	Description and DCO Process	Introduction	Further, where the Applicant intends to acquire land or rights, or interfere with any of NGT's interests in land or NGT's apparatus, NGT will require appropriate protection and further discussion is required in that regard. Further detail is set out below.	As noted above, Part 4 of Schedule 15 (given effect by Article 45 (Protective Provisions)) to the **draft Development Consent Order [APP-016]** contains draft Protective Provisions for the benefit of NGT which are intended to ensure that any exercise of powers affecting NGT's land, rights or assets is appropriately controlled. The Applicant is progressing discussions with NGT in respect of the form of Protective Provisions to be contained within the final DCO.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
NGT-004	Description and DCO Process	NGT Infrastructure Within/In Close Proximity to the Proposed Order Limits	NGT infrastructure within/in close proximity to the proposed Order Limits NGT's has Feeder Main 14 (Wormington to Pucklechurch) in located within and in close proximity to the proposed Order Limits. Associated apparatus, including Cathodic Protection Groundbeds/Transformer Rectifier[s], are also located within and in close proximity to the proposed Order Limits. The route of the above mentioned Feeder Main is shown by a blue line on the interaction plan ("Plan") (which will be provided under separate cover to the Planning Inspectorates email address for the Project given it can't be uploaded via the portal). The proposed Order Limits are shown outlined in red on the Plan. NGT has the benefit of easements to enable the retention and maintenance of, and access to, the abovementioned Feeder Main and associated apparatus, including rights to prevent the following activities within the easement strip: - erection of permanent and/or temporary buildings/structures; - changes to existing ground levels; and - storage of materials. The pipeline easements are indicatively shown by a pink line on the Plan.	The Applicant notes this comment. As noted above, Part 4 of Schedule 15 (given effect by Article 45 (Protective Provisions)) to the **draft Development Consent Order [APP-016]** contains draft Protective Provisions for the benefit of NGT which are intended to ensure that any exercise of powers affecting NGT's land, rights or assets is appropriately controlled. The Applicant is progressing discussions with NGT in respect of the form of Protective Provisions to be contained within the final DCO.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
NGT-005	Description and DCO Process	Protection of NGT Assets	Protection of NGT Assets As a responsible statutory undertaker, NGT's primary concern is to meet its statutory obligations and ensure that any development does not impact in any adverse way upon those statutory obligations. As such, NGT has a duty to protect its position in relation to infrastructure and land which is within or in close proximity to the proposed Order Limits. The above mentioned Feeder Main and its associated apparatus form an essential part of the gas National Transmission System (NTS). NGT therefore require protective provisions to be included within the draft Order to ensure that the apparatus and associated land interests are adequately protected and that relevant safety standards are complied with during construction and operation of the Project. NGT's standard form of protective provisions (which have been provided to the Promoter) have been commercially assessed and deemed necessary in their entirety in order to protect its assets. Unless and until NGT is satisfied that adequate protections have been secured by way of agreed protective	As noted above, Part 4 of Schedule 15 (given effect by Article 45 (Protective Provisions)) to the **draft Development Consent Order [APP-016]** contains draft Protective Provisions for the benefit of NGT which are intended to ensure that any exercise of powers affecting NGT's land, rights or assets is appropriately controlled. The Applicant is progressing discussions with NGT in respect of the form of Protective Provisions to be contained within the final DCO.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			provisions, NGT must object to the Order.	
NGT-006	Description and DCO Process	Summary	Compulsory Acquisition Powers in respect of the Project As noted, where the Applicant intends to acquire land or rights, or interfere with any of NGT's interests in land, NGT will require further discussion with the Applicant.	As noted above, Part 4 of Schedule 15 (given effect by Article 45 (Protective Provisions)) to the **draft Development Consent Order [APP-016]** contains draft Protective Provisions for the benefit of NGT which are intended to ensure that any exercise of powers affecting NGT's land, rights or assets is appropriately controlled. The Applicant is progressing discussions with NGT in respect of the form of Protective Provisions to be contained within the final DCO. The Applicant also welcomes continued engagement with NGT.
NGT-007	Description and DCO Process	Attachment	Attachement(s)	The Applicant makes note of the Interaction Plan and continues to progress discussions with NGT regarding the interaction of its assets with the scheme, and how these can be appropriately protected through Protective Provisions.

4.4 The Coal Authority (trading name The Mining Remediation Authority)

Table 4-4 RR-4652

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
CA-001	Description and DCO Process	No comment	The Planning team at the Coal Authority have reviewed the coal mining data we hold against the areas proposed for the Solar Park project. I can confirm that based on the area provided in respect of the extent of the solar farm none of the sites to which this proposal relates are in areas where our records indicate that coal mining features are present. The records we hold indicate that the sites identified for the Solar Park project lie outside of the defined coalfield. On the basis that the proposed Solar Park does not lie within the defined coalfield I can confirm that the Planning team at the Coal Authority have no specific comments to make on this project.	The Applicant notes this comment.

4.5 Exolum Pipeline on behalf of Fisher German LLP

Table 4-5 AS-006

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
EP-001	Description and DCO Process	Protective Provisions	Dear Sirs/Madam Relevant Representation of Exolum Pipeline System Limited (Exolum) in respect of Lime Down Solar Park Regarding the above Referenced Planning Application. We confirm that our client's High-Pressure Oil Pipeline Apparatus will be affected by the application as indicated in the attached plan(s) and we must therefore OBJECT for the following key reasons: • The application has the potential to contravene Exolum's ability to Safely access and maintain its assets under their legal rights as set out in Part IV of The Energy Act 2013, and • Due to the potential for breach(s) of the Health & Safety at Work Act 1974 with specific concerns around Regulation 15 of the Pipeline Safety Regulations 1996 and the potential for any subsequent work close to the High-Pressure Pipeline to impact both the Safety of the pipeline and those doing the work. We note in this specific case: 1. Exolum object to Lime Down Solar Park on the basis that protective provisions are required, and that any interaction with their assets must be subject to a formal agreement. It is therefore critical that all Construction and Design work affecting a High-Pressure Pipeline is discussed and agreed with Exolum before the	The Applicant makes note of this comment. Part 8 of Schedule 15 (given effect by Article 45 (Protective Provisions)) to the **draft Development Consent Order [APP-016]** contains draft Protective Provisions for the benefit of Exolum which are intended to ensure that any exercise of powers affecting Exolum's land, rights or assets is appropriately controlled. The Applicant is progressing discussions with Exolum in respect of the form of Protective Provisions to be contained within the final DCO. The Applicant also welcomes continued engagement with Exolum.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			objection can removed and before any work on site. NOTE: The location plan(s) supplied are intended for general guidance only and should not be relied upon for detailed design, excavation or construction purposes. No guarantee is given regarding the accuracy of the information provided in the plans and to verify the true location of the High-Pressure Pipeline at site contact MUST be made with Exolum to arrange a site visit. My client must be consulted to ensure the proposal has no impact on their High-Pressure Pipeline apparatus. Their contact details are: Central Services Email: pipelinerow@exolum.com Ashdon Road Tel: 01799 564101 Saffron Walden Essex, CB10 2NF When contacting Exolum, please quote this Unique Reference Number . Information on how Exolum Safely manage development near its High-Pressure Pipeline apparatus can be found at the following link: Should you require any further assistance regarding this letter please contact the undersigned or alternatively, you can contact Exolum using the details provided above. Yours faithfully	

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			For and on behalf of FISHER GERMAN LLP (Exolum's Authorised Agent) Enc. Location Plan cc. Exolum Central Services	
EP-002	Description and DCO Process	Attachment	Attachements	The Applicant makes note of the Location Plan.

4.6 MP Roz Savage

Table 4-6 RR-4086

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
RS-001	Description and DCO Process	Introduction	As Member of Parliament for the South Cotswolds, the constituency in which this project would be located, I submit these comments to reflect the significant concerns raised with me by local residents. The proposed Lime Down site lies entirely within my constituency, and it is my responsibility to state in the strongest possible terms that this development is inappropriate and would be severely detrimental to both the landscape and the wellbeing of surrounding communities.	The Applicant welcomes the comments from the Member of Parliament for the South Cotswolds and thanks them for their constructive engagement throughout the process, including the various communications and meetings held to date. Landscape An assessment of landscape and visual effects are presented in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**. The Landscape and Visual Impact Assessment (LVIA) assesses effects on identified landscape and visual receptors, including residential properties, users of public rights of way and roads, and identifies where significant effects may occur.

				The LVIA found no significant long term visual effects to residential properties as a consequence of the Scheme. The visual effects of the Scheme are summarised in **ES Volume 3, Appendix 8-3-3 [APP-192]**. Temporary Major/Moderate and Moderate Adverse effects on visual receptors have been recorded across the Scheme during construction and at Year 1. However, for the majority of these receptors, the effects reduce to non–significant levels as a result of the embedded mitigation measures which are set out in Section 8.9 of **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]** and include landscape buffers, retention of existing hedgerows and woodland, and new planting to provide screening and integration over time. The assessment also identifies that there would be some long-term significant effects on the visual amenity of users of some localised footpaths, as a result of the Scheme. This predominantly relates to locations where footpaths diagonally cross fields and mitigation planting would be inappropriate to landscape character and the legacy landscape. Those receptors which would experience Significant Long Term Visual Effects are listed in Table 8-30 of the **LVIA [APP-060].** The scale of development within the Order Limits has been significantly reduced from the layout assessed in the Preliminary Environmental Information Report (PEIR) through an iterative design process undertaken in response to

				consultation and in accordance with the mitigation hierarchy to avoid, reduce and mitigate adverse effects. As part of this design evolution, panels along the edge of the Cotswolds National Landscape and along the Fosse Way have been removed. Mitigation measures to address landscape and visual effects are set out in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**, **Figure 3-4-1 to 3-4-5.2 Landscape and Ecology Mitigation Plan [APP-084]** and secured within the **Outline Landscape and Ecological Management Plan (LEMP) [APP-283]** and the **Outline Ecological Protection and Mitigation Strategy (EPMS) [APP-284]**. These documents include proposals for new and enhanced planting, retention of existing hedgerows and woodland, and landscape integration measures to reduce visual effects over time. In addition, the Scheme design incorporates minimum offsets from existing landscape features, including residential properties, ancient woodland, woodland, hedgerows, public rights of way and watercourses, to further limit visual impacts. Although these measures reduce the effects of the Scheme on nearly all receptors, as noted above there are 10 receptors which would experience Significant Visual Effects for the duration of the Scheme as set out Table 8-30 of the **LVIA [APP-060]**. Mitigation measures to address landscape and visual effects are set out in **ES Volume 1, Chapter 8: Landscape**

				and Visual [APP-060], **Figure 3-4-1 to 3-4-5.2 Landscape and Ecology Mitigation Plan [APP-084]**. The preparation, approval and implementation of detailed landscape and ecological management plans, substantially in accordance with the **OLEMP [APP-283]** and **EPMS [APP-284]**, are secured through requirements in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that the identified mitigation measures are delivered and maintained throughout the lifetime of the Scheme. <u>Wellbeing</u> Impacts on mental health and wellbeing are assessed in **ES Volume 1, Chapter 18: Human Health [APP-070]**. This chapter provides a comprehensive assessment of the Scheme's potential effects on human health, including mental health and wellbeing, through consideration of a broad range of health determinants. These include access to open space and recreation, transport and connectivity, community identity and cohesion, employment and income, noise and vibration, air quality, and access to health and social care services. The assessment applies a health "lens" to the findings of relevant technical chapters and concludes that, with the embedded mitigation and additional measures secured through the relevant management plans **[APP-277** to **APP-287]** secured by their respective requirements in Schedule 2 to the **Draft**

				DCO [APP-016], the Scheme would not give rise to significant adverse effects on population health, including mental health and wellbeing. Mitigation measures include (but are not limited to) ensuring PROWs remain open as much as is practicable, HGV movements are set to defined routes and within set hours, community liaison and engagement is maintained, and construction impacts on noise and air quality are regulated. With specific regard to community liaison, this is directly secured through Requirement 4 in Schedule 2 to the **Draft DCO [APP-016]** through the provision of a community liaison group. This group will act as an intermediary between the public and the onsite contractors to ensure community concerns and any information they need are communicated and responded to, so as to reduce community anxiety and impacts on mental wellbeing, and to assist in directing the public to mental health support if required. The assessment in **ES Volume 1, Chapter 18: Human Health [APP-070]** focuses on communities within a 2 km Study Area surrounding the Scheme, identified as those most likely to experience potential health-related effects. Baseline analysis demonstrates that rates of poor mental health within the Study Area are generally lower than national averages, and the assessment considers potential pathways by which the Scheme could influence mental wellbeing, including changes to environment, amenity, access and community factors. Residual effects of the

				Scheme on health following mitigation are assessed as not significant at any phase of the Scheme. Consultation with Wiltshire Council's Public Health Team has informed the approach to mental health considerations, as documented in **ES Volume 3, Appendix 18-1: Human Health Consultation [APP-244].** Through this engagement, the Applicant has committed to signposting locally available mental health and wellbeing resources to members of the public engaging with the Scheme, using information provided by Wiltshire Council's Public Health Team. The Applicant will continue to monitor consultation responses relating to mental health and will provide appropriate signposting to existing local support services where requested. The Applicant notes that the assessment methodology for health and wellbeing has been agreed with Wiltshire Council's Public Health team and is set out in the relevant Statement of Common Ground to be submitted at Deadline 1.

RS-002	Soils and Agriculture	BMV land	The site comprises a substantial area of best and most versatile agricultural land. National Policy Statement guidance makes clear that developers of solar PV Nationally Significant Infrastructure Projects should, as a baseline expectation, minimise impacts on Grade 1, 2 and 3a land and should prioritise lower-quality land wherever possible. The Lime Down proposal does not meet this expectation, and there is clear evidence that high-quality farmland would be lost.	The NPS requirements for the siting of solar farms on agricultural land are set out in **Volume 1, Chapter 17: Soils and Agriculture [APP-069]** Section 17.3. The NPSs do not preclude the use of BMV agricultural land. As detailed in **Volume 1, Chapter 17: Soils and Agriculture [APP-069]**, and **Volume 3, Appendix 17-1: Agricultural Land Classification and Soil Survey Report [APP-243],** a majority (around two-thirds) of the site area is non-BMV in Subgrade 3b and Grade 4 **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]** explains how the Applicant followed a staged approach to assessment, taking into consideration a range of planning, environmental and operational factors. Following identification of an area of search, planning and environmental constraints including best and most versatile agricultural land (grades 1, 2 and 3) were excluded in order to seek to identify a site on unconstrained land. Once it was established that areas of non-BMV land were not available, Grade 3 BMV land was introduced back into the area of search. **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]** concludes that there are no more suitable and available locations within the search area than the proposed location for the Scheme, based on the criteria identified. The Scheme will result in a temporary but long-term and reversible loss of agricultural land for the operational life of

				the Scheme. As set out in **ES Volume 1, Chapter 17: Soils and Agriculture, Section 17.10 [APP-069]**, this gives rise to a temporary, long-term moderate adverse effect on agricultural land overall, and a temporary, long-term major/moderate adverse effect on BMV land, both of which are assessed as significant. These effects are fully reported in the ES and are a matter for the Secretary of State to weigh in the planning balance against the need for the Scheme and its wider benefits. There are no significant permanent effects on agricultural land, as all land will be returned to its original use and condition as far as practicable following decommissioning.

RS-003	Description and DCO Process	Scale	The development represents an unprecedented NSIP in both scale and geographical reach. Spanning 748 hectares (1,848 acres) within a 46 square-kilometre (18-square-mile) envelope, it would stretch across open countryside and affect the communities of Malmesbury, Sherston, Alderton, Foxley, Grittleton, Hullavington, Rodbourne and Norton. Rather than forming a single consolidated site, the scheme is dispersed and industrial in form, extending across miles of rural landscape and requiring extensive interconnecting infrastructure. The footprint, comparable in size to major national infrastructure, would have a profound and lasting impact on the surrounding communities.	The Scheme has been designed to deliver the greatest possible benefit from the available land and the available grid connection, whilst avoiding, minimising and/or mitigating harmful environmental effects. As per the description set out in **ES Volume 1, Chapter 3: The Scheme [APP-055]** the total area within the DCO Order Limits encompasses approximately 1,237 hectares (ha). Of this, the 'Solar PV Sites' comprise approximately 749.1 ha of land. Around 479.5 ha of this land is proposed as being required for installation of solar PV, battery storage, and associated infrastructure. The remaining 269.5 ha would provide areas dedicated to ecological mitigation, measurable Biodiversity Net Gain (BNG) delivery, landscaping, offsets and agricultural land managed for environmental enhancement and habitat creation. These mitigation measures are set out in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060], Figure 3-4-1 to 3-4-5.2 Landscape and Ecology Mitigation Plan [APP-084]** and detailed within the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]**. The Cable Route Corridor, which stretches approximately 22 km from 'Lime Down D' to Melksham Substation and links together the Solar PV Sites, covers approximately 463.2 ha. Approximately 17.8 ha (of which 5.9 ha overlap with the

				Cable Route Corridor) is proposed for Highway Improvement Areas within which improvements to sections of the existing highway network will be completed to facilitate access to the Scheme, such as improvements to road edge and traffic management. Work will be undertaken by the Applicant and National Grid within the Existing National Grid Melksham Substation, requiring a total area of 12.8 ha. This is set out in **ES Volume 1, Chapter 3: The Scheme [APP-055]**. The Applicant remains committed to delivering a Scheme that makes a meaningful contribution to the UK's transition to net zero, while also seeking to minimise adverse impacts and maximise opportunities for environmental enhancement and community benefits. As set out in **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185],** the Applicant undertook an initial review which did not identify a single site of the appropriate size (1,100 ha) within the area of search. Therefore, the Applicant considered both contiguous land parcels and land parcels near one another. The **Statement of Need [APP-266]** explains at Section 7.4 that NSIP proposals may comprise adjoining or separate parcels of land and that *"the connection of separate parcels of suitable land together into a single scheme may, subject to analysis, enable those parcels of land to connect economically to the*

				electricity system" which is the case for this scheme. Section 8.2 of the **Statement of Need [APP-266]** explains that by bringing the parcels together into a single scheme, the Scheme is able to carry a connection to the National Electricity Transmission System (NETS), thus providing a local source of low carbon electricity and also enabling the efficient bulk transfer of energy generated at the Scheme so that any surplus can be used to cover shortfalls elsewhere. By connecting to the NETS, the Scheme will not impact the feasibility or timing of distribution network connections for either new generation or consumption connections which among other things are required to support the delivery of Wiltshire County Council's growth plans.

RS-004	Landscape and Visual	Scale	It would convert productive agricultural land and permanently alter the distinctive historic character of North Wiltshire. Its scale and fragmented layout risk overwhelming local villages, eroding their settings, harming valued footpaths and views, and diminishing the rural environment that underpins both community identity and the area's essential role in food production.	Agricultural Land Use and Food Production The effects of the Scheme on agricultural land, including land quality and productivity, are assessed in **ES Volume 1, Chapter 17: Soils and Agriculture [APP-069]**, supported by **ES Volume 3, Appendix 17-1: Agricultural Land Classification and Soil Resource Survey Report [APP-243]**. That assessment identifies that the majority of agricultural land affected is not Best and Most Versatile (BMV) land, comprising predominantly Subgrade 3b and Grade 4 land, which is not considered high-quality agricultural land in planning terms. Government-led agricultural initiatives, such as the Sustainable Farming Incentive which is relaunching later in 2026, have prioritised soil health, environmental enhancement and climate resilience, recognising that long-term food security is influenced by a range of factors beyond land take alone, including soil condition, climate change and environmental pressures. The Scheme allows soils to remain in situ and undisturbed during operation, supporting soil recovery and long-term land health, with land reinstated and returned to agricultural use as far as practicable following decommissioning. No permanent loss of agricultural land is anticipated. The Applicant does not consider that food security will be compromised by the Scheme (or solar energy more widely). The latest figures to September 2024

				indicate that solar occupied around 21,200 ha of agricultural land in the UK. In 2025, 545,000 ha of arable land in England were left uncropped (source: Department for Environment, Food & Rural Affairs, Agricultural land use in England at 1 June 2025). It should also be noted that food security is not identified as an issue within the suite of Energy National Policy Statements or the National Planning Policy Framework (NPPF). Further, the Government's UK Solar Roadmap (2025) states that solar development is not considered to compromise food security, but that the climate and nature crisis poses the greatest long-term risk to food security- a risk which the Scheme directly helps to address by providing a secure, low-carbon source of electricity. As set out in Section 2 of the **Outline Decommissioning Strategy [APP-279],** post-decommissioning of the Scheme, the landowners would choose how the land is to be used and managed. The landowner may return all of the land to arable use, although it is likely that established habitats such as hedgerows and woodland would be retained given their potential benefits to agricultural land and the wider farming estate. Whilst there is an environmental and economic cost to importing food, and it is recognised the UK imports a far greater amount of food than it exports, the impact of the Scheme on food import

				requirements or the food and drinks economy is not material at a national scale and has therefore not been assessed. <u>Landscape</u> Please refer to the Applicant's Response to RR-001 in relation to landscape and visual effects. As set out in **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]**, the Applicant undertook an initial review which did not identify a single site of the appropriate size (1,100 ha) within the area of search. Therefore, the Applicant considered both contiguous land parcels and land parcels near one another. The **Statement of Need [APP-266]** explains at Section 7.4 that NSIP proposals may comprise adjoining or separate parcels of land and that "*the connection of separate parcels of suitable land together into a single scheme may, subject to analysis, enable those parcels of land to connect economically to the electricity system*" which is the case for this scheme. Section 8.2 of the **Statement of Need [APP-266]** explains that by bringing the parcels together into a single scheme, the Scheme is able to carry a connection to the National Electricity Transmission System (NETS), thus providing a local source of low carbon electricity and also

				enabling the efficient bulk transfer of energy generated at the Scheme so that any surplus can be used to cover shortfalls elsewhere. By connecting to the NETS, the Scheme will not impact the feasibility or timing of distribution network connections for either new generation or consumption connections which among other things are required to support the delivery of Wiltshire County Council's growth plans. <u>Public Rights of Way (PRoW) and Footpaths</u> A detailed assessment of the likely significance of effects from the Scheme on the use and desirability of individual PRoW and recreational access to the countryside is included in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** and **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]**. This assessment considers the impact on individual recreational routes, including their practical use, enjoyment and desirability. The Applicant confirms that the majority of significant adverse effects can be mitigated. However, some significant adverse effects to users of PRoW and unsurfaced roads in Lime Down E during construction cannot be mitigated further. No significant residual effects are anticipated during the operational phase of the Scheme. The assessment in **ES Volume 1, Chapter 18: Human Health [APP-070]**

				also considers the physical and mental health impacts of changes to recreation and countryside access under the assessment topic 'open space, leisure and play', and concludes that no significant adverse effects are anticipated at any phase of the Scheme. The Applicant confirms that existing PRoW are to be protected as far as practicable within the Scheme design, with management measures set out in the **Outline Public Rights of Way and Permissive Paths Management Plan (PROWPPMP) [APP-282]**, confirmed as embedded mitigation in Section 16.9 of ES Chapter 16. New permissive access routes have been incorporated into the Scheme design, shown as Work No. 10 on the **Works Plan [APP-007]** and illustrated on **ES Volume 2, Figure 3-4: Landscape and Ecology Mitigation Plan [APP-084]**. These are identified as additional mitigation and enhancement measures in Section 16.11 of ES Chapter 16. The PRoW and Permissive Paths Management Plan is secured through Requirement 16 of Schedule 2 of the **Draft Development Consent Order [APP-016]**. The preparation, approval and implementation of the detailed Construction Environmental Management Plan and Construction Traffic Management Plan, substantially in accordance with the outline plans, are secured through Requirements 13 and 15 respectively in Schedule 2 of the **Draft Development Consent Order [APP-**

				016], ensuring that impacts on PRoW and recreational routes are appropriately managed during construction. The approach to recreation and access has been discussed with Wiltshire Council's Public Health team and is under discussion with Wiltshire Council's Countryside Access Team and is set out in the relevant Statement of Common Ground to be submitted at Deadline 1**.**
RS-005	Description and DCO Process	IGP	Island Green Power, the developer behind Lime Down, is wholly owned by (Redacted), an international investment group whose management of public utilities has generated serious public concern, most notably through its ownership of Thames Water. In the UK and abroad, (Redacted) involvement in water, energy and transport infrastructure has been linked with (Redacted) and underinvestment. The consequences of its stewardship of Thames Water continue to be felt through inadequate infrastructure and frequent sewage discharges into rivers in my constituency and beyond. Given this record, it is reasonable for residents to question whether such an operator can be trusted to control a major element of national energy infrastructure. The stewardship of our landscape and long-term energy security must be subject to the highest possible scrutiny.	The Applicant acknowledges the expression of distrust towards the Scheme and has demonstrated the Scheme's compliance with all statutory requirements under the Planning Act 2008 and applicable legislation such as The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017. The Applicant is subject to legally binding Development Consent Order (DCO) requirements. The Planning Act 2008 also contains enforcement provisions regarding compliance with the terms of a DCO. The Applicant has a strong track record of developing Nationally Significant Infrastructure Project (NSIP) scale projects, notably the consented Cottom Solar Project and West Burton Solar Project, alongside a strong pipeline of further applications coming forward. The Applicant confirms that the owners of Island Green Power, Macquarie, has a strong record of long-term UK investment. Since 1999, Macquarie has invested more than £65 billion into UK infrastructure, including energy projects, supporting more than 33,000 UK jobs.

				The Funding Statement [APP-019] in the Application provides details of the corporate structure of Lime Down Solar Park Limited and how the Scheme is being funded.
RS-006	Other Environmental Matters	BESS safety	The inclusion of a large-scale Battery Energy Storage System introduces further serious risks. Although fires in lithium-ion systems are uncommon, the consequences can be severe. Once thermal runaway begins, these fires are extremely difficult to control, burn at high temperatures and release toxic gases such as hydrogen fluoride, as well as flammable vapours that can cause secondary explosions.	The Battery Energy Storage System (BESS) containers proposed for the Scheme will incorporate built-in safety features for fire avoidance, detection and suppression. The Scheme layout also incorporates separation distances between battery containers to ensure that any isolated fire would not become widespread or lead to a major incident. As shown on **ES Volume 2, Figure 3-1: Indicative Site Layout Plan [APP-081],** the battery containers will be located more than 200 metres from the nearest Public Right of Way and more than 500 metres from any residential receptors. The Applicant notes that the approach to BESS safety is under discussion with Dorset and Wiltshire Fire and Rescue Service (D&WFRS) and is set out in the relevant Statement of Common Ground to be submitted at Deadline 1. An **Outline Battery Safety Management Plan (OBSMP) [APP-286]** has been prepared for the Scheme using guidance from Dorset and Wiltshire Fire and Rescue Service and incorporating recommendations of the National Fire Chiefs Council. The **OBSMP [APP-286]** ensures that risks associated with battery storage are appropriately mitigated. Section 6.1.1 of the **OBSMP [APP-286]** confirms that at the detailed design stage,

				the selected BESS will have undertaken Large Scale Fire Testing (LSFT) to fully inform inputs for risk assessment tools which will be utilised together with detailed consequence modelling to provide a comprehensive site operations and emergency response safety audit. LSFT is a mandatory requirement under NFPA 855 (2026) safety standards to demonstrate thermal insulation protection capabilities of the BESS enclosure design, validate minimum equipment spacing distances, and demonstrate that deflagrations do not occur and/or can be safely constrained. As set out in **Outline Battery Safety Management Plan (OBSMP) [APP-286]**, the BESS Area will have a robust and validated Emergency Response Plan (ERP), developed in consultation with Dorset & Wiltshire Fire and Rescue Service at the detailed design stage. Section 5.4 of the OBSMP specifies the typical emergency response protocols, procedures and safety information that will be included in the ERP. The ERP will apply to all stages of the Scheme, including construction, operation and decommissioning. Potential effects of toxic gases arising from a BESS fire are assessed in **ES Volume 1, Chapter 15: Air Quality [APP-067] and in ES Volume 1, Chapter 20: Other Environmental Matters [APP-072]**, Section 20.7: Major Accidents and Disasters. An assessment of how these fumes could affect sensitive receptors within a 1 km radius of the BESS Area,

				including residential properties and ecological receptors, is provided in **ES Volume 1, Chapter 15: Air Quality [APP-067].** This assessment concludes that no significant off-site impacts are predicted should a fire event occur. In the unlikely event of a fire, the precautionary measures set out in the **Outline Battery Safety Management Plan (OBSMP) [APP-286]** - including advice to remain indoors and close windows - would further reduce potential impacts to residents. The **OBSMP [APP-286]** is secured through Requirement 6 (Battery safety management) in Schedule 2 of the **Draft DCO [APP-016]**, which provides that Work No. 2 must not commence until a Battery Safety Management Plan has been submitted to and approved by the relevant planning authority. The approved plan must be substantially in accordance with the Outline Battery Safety Management Plan. The Draft DCO also requires the relevant planning authority to consult with Dorset and Wiltshire Fire and Rescue Service and the Environment Agency before determining the application, and that the Battery Safety Management Plan must be implemented as approved.

RS-007	Site Selection and Alternatives	BESS location	The proposed BESS site lies worryingly close to the main railway line, creating potential danger for passengers, railway staff and emergency responders, as well as local residents, who would face fire and toxic fume hazards.	The location of the Battery Energy Storage System (BESS) has been informed by a detailed site selection and design evolution process, as set out in **ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP-056]**. This chapter explains that land at Lime Down D was identified as an appropriate location due to its proximity to the solar PV arrays and the on-site substation, providing operational benefits including minimising transmission losses, maximising storage efficiency, and enabling rapid and reliable grid response. In considering options for co-locating the BESS with the solar PV Sites, Lime Down D was selected as the preferred location due to its central position within the Scheme, effective natural and proposed screening, limited proximity to residential properties, and closeness to existing infrastructure corridors, including the railway line. Locating the BESS within an existing infrastructure corridor reduces the need for additional land take and avoids introducing new isolated infrastructure into undeveloped areas. The assessment concludes that siting the BESS at Lime Down D presents the lowest potential for significant adverse environmental effects. Accordingly, the proximity of the BESS to the railway line does not give rise to significant safety or environmental concerns. Furthermore, during an emergency event, Network Rail can be made aware of the incident and halt trains from passing the site if it is deemed necessary to do so. As such, there are no significant adverse effects to

				human health anticipated as a result of the Scheme, as assessed in **ES Volume 1, Chapter 18: Human Health [APP-070]**. The Applicant has followed National Fire Chiefs Council (NFCC) guidance and commissioned a Plume Assessment Study (**ES Volume 3, Appendix 15-2 [APP-239]**) to model toxic gas emissions and visibility impacts from a BESS fire on all sensitive receptors within a 1km radius of the BESS area. Six worst case BESS fire locations (i.e. locations within the BESS Area closest to sensitive receptors) have been modelled as depicted in **ES Volume 2, Figure 15-5: Battery Energy Storage System Fire Emissions Study Area [APP-166]**. The Concentrations of carbon monoxide (CO), formaldehyde, hydrogen chloride (HCl), hydrogen cyanide (HCN), hydrogen fluoride (HF), ammonia (NH_3), nitrogen dioxide (NO2) and particulates from a potential BESS fire have been modelled using an air quality dispersion model to determine the likely effects on human health. A high-level visibility assessment has also been undertaken using the modelled particulates results to determine the effect of BESS fire emissions on visibility on the local road and rail network to inform the **Outline Battery Safety Management Plan (OBSMP) [APP-286]**. The Plume Assessment Study has concluded that there are no significant

				toxic emission or visibility impacts at all sensitive receptor locations. The Applicant has also committed to commissioning an additional Plume Analysis Study at the detailed design stage as stipulated in Section 5.5.9 of the OBSMP and secured through the DCO: "*..at the detailed design stage a BESS system and site specific Plume Analysis study will be conducted to assess the environmental impact of a site incident to sensitive receptors within a 1 km radius. Toxic gas emissions to sensitive receptors must be below relevant public health exposure limit guidelines when the battery system of a BESS is fully consumed (burnt out), production of Particulate Matter (PM) and a visibility impact assessment on any transport links within a 1 km radius of the BESS area will also be included. The ERP produced at the detailed design stage (template outlined in Section 5.4.4) will incorporate all necessary emergency response procedures and actions based upon thermal runaway test data supplied by the BESS system provider.*" The Applicant notes that the approach to BESS safety is under discussion with Dorset & Wiltshire Fire & Rescue Service (D&WFRS) and is set out in the relevant Statement of Common Ground to be submitted at Deadline 1. The **OBSMP [APP-286]** is secured through Requirement 6 (Battery safety management) in Schedule 2 of the **Draft DCO [APP-016]**, which provides that Work No. 2 must not commence until a

				Battery Safety Management Plan has been submitted to and approved by the relevant planning authority. The approved plan must be substantially in accordance with the Outline Battery Safety Management Plan. The Draft DCO also requires the relevant planning authority to consult with Dorset and Wiltshire Fire and Rescue Service and the Environment Agency before determining the application, and that the Battery Safety Management Plan must be implemented as approved.
RS-008	Other Environmental Matters	BESS safety	The water and chemicals required to extinguish a BESS fire would risk infiltrating the soil and local watercourses, and polluting the aquifer that serves communities across the Thames Valley. Any contamination would be catastrophic for those who rely on this water. This is a textbook example of a low-likelihood, high-consequence event, and it must be treated as such. Even if statistically rare, the potential impacts on public health and the environment are severe and long-lasting.	An assessment of potential contamination risks is provided in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [APP-063]** and **ES Volume 1, Chapter 19: Ground Conditions [APP-071]**, which consider risks to surface water, groundwater and sensitive receptors during construction, operation and decommissioning of the Scheme. These assessments conclude that, with appropriate mitigation and management measures in place, no significant contamination effects are anticipated. The Applicant notes that the approach to assessment of risk to groundwater and surface water arising from the Scheme has been agreed with Wiltshire Council and is currently being discussed with the Environment Agency. These discussions are set out in the relevant Statement of Common Ground with Wiltshire Council to be submitted at Deadline 1 and in the relevant Statement of Common Ground with the Environment Agency which will be submitted at a later Deadline.

				Mitigation and management measures to protect groundwater and surface water are set out in the **Outline Construction Environmental Management Plan [APP-277]** and supporting management plans. These include pollution prevention controls, containment measures, emergency response procedures, and site-specific drainage design. In particular, drainage within substation and Battery Energy Storage System (BESS) areas will incorporate lined drainage and automatically actuating shut-off valves to contain any accidental spills or firewater, preventing release to surrounding land or watercourses. Routine maintenance and panel cleaning will use minimal water and will not require detergents or chemical cleaning products, in line with standard industry practice, meaning there is no expected risk of chemical runoff from panel washing. In addition, the cessation of agricultural activity within the Solar PV Sites will remove routine inputs of fertilisers, pesticides and herbicides, thereby reducing existing sources of diffuse contamination. The preparation, approval and implementation of the detailed CEMP, substantially in accordance with the outline plan, is secured through Requirement 13 in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that contamination risks are appropriately managed throughout construction, operation and decommissioning of the Scheme.

RS-009	Other Environmental Matters	BESS safety	These concerns are amplified by the size of the installation and the absence of a statutory regulatory framework for BESS safety. Current practice relies largely on non-binding guidance. Taken together, the proximity to transport infrastructure, the severity of potential fire scenarios and the significant challenges for emergency response all highlight the inappropriate siting of a BESS of this scale within the Lime Down scheme.	The BESS Area is located within a seven-minute journey of the Strategic Road Network (SRN) and is accessible to emergency vehicles. As presented in **ES Volume 2, Figure 3-1 to 3-1-5: Indicative Site Layout Plan [APP-081]**, a separate emergency access (Access 21) to the BESS Area is also provided in accordance with the latest National Fire Chiefs Council (NFCC) guidance. The Applicant has followed National Fire Chiefs Council (NFCC) guidance and commissioned a Plume Assessment Study to model toxic gas emissions and visibility impacts from a BESS fire on all sensitive receptors within a 1km radius of the BESS area. The fire emissions modelled in the report were based upon recent UK Health Security Agency (UKHSA) requests for DCO BESS projects which explore both immediate air quality impacts together with annual UK air quality requirements. The UKHSA is a statutory consultee for the Scheme and has confirmed that they are satisfied with the Applicant's submitted documentation and Plume Assessment Study. Six worst case BESS fire locations (i.e. locations within the BESS Area closest to sensitive receptors) have been modelled as depicted in **ES Volume 2, Figure 15-5: Battery Energy Storage System Fire Emissions [APP-166]**. The Concentrations of carbon monoxide (CO), formaldehyde, hydrogen chloride (HCl), hydrogen cyanide (HCN), hydrogen fluoride (HF), ammonia (NH_3), nitrogen dioxide (NO2) and particulates from a

				potential BESS fire have been modelled using an air quality dispersion model to determine the likely effects on human health. A high-level visibility assessment has also been undertaken using the modelled particulates results to determine the effect of BESS fire emissions on visibility on the local road and rail network to inform the **Outline Battery Safety Management Plan (OBSMP) [APP-286]**. The Plume Assessment Study has concluded that there are no significant toxic emission or visibility impacts at all sensitive receptor locations. The Applicant has also committed to commissioning an additional Plume Analysis Study at the detailed design stage of the project as stipulated in Section 5.5.9 of the OBSMP and secured through Requirement 6 of the **Draft DCO [APP-016]**. The Applicant has also committed to commissioning an additional Plume Analysis Study at the detailed design stage as stipulated in Section 5.5.9 of the OBSMP and secured through the DCO: "*..at the detailed design stage a BESS system and site specific Plume Analysis study will be conducted to assess the environmental impact of a site incident to sensitive receptors within a 1 km radius. Toxic gas emissions to sensitive receptors must be below relevant public health exposure limit guidelines when the battery system of a BESS is fully consumed (burnt out), production of Particulate Matter (PM) and a visibility impact assessment on any transport links within a 1 km radius of the BESS area will also be included. The ERP produced at the*

				detailed design stage (template outlined in Section 5.4.4) will incorporate all necessary emergency response procedures and actions based upon thermal runaway test data supplied by the BESS system provider." As now mandated under NFPA 855 (2026) the Applicant will only be able to select a BESS system that has undertaken Large Scale Fire Testing (LSFT). At the detailed design stage, the selected BESS LSFT data will be leveraged to fully inform inputs for risk assessment tools which will be utilized together with detailed consequence modelling to provide a comprehensive site operations and emergency response safety audit, this is stipulated in the OBSMP pre-construction requirements (Section 6). An **Outline Battery Safety Management Plan (OBSMP) [APP-286]** has been prepared for the Scheme using guidance from Dorset and Wiltshire Fire and Rescue Service and incorporating recommendations of the National Fire Chiefs Council. The safety objectives for the design of the BESS site are listed in Section 2.4 of the OBSMP. The OBSMP will be amended at Deadline 1 to fully accommodate the latest BESS safety requirements contained in NFPA 855 (2026) ensuring that any credible risks associated with battery storage are either prevented or fully mitigated if a BESS failure occurs.

				Section 2.4.2 of the OBSMP stipulates that: *"Final BESS design and site layout will have been validated through mandatory Large Scale Fire Testing (LSFT) and rigorous consequence modelling to minimise the requirement for any D&WFRS intervention in a thermal runaway incident. LSFT must establish minimum equipment spacing distances that demonstrate there is no fire propagation to adjacent BESS enclosures or ESS equipment. D&WFRS intervention in worst case scenarios would typically be limited to boundary cooling of adjacent BESS and Energy Storage System (ESS) units to prevent the fire from spreading. This strategy will be finalised with D&WFRS and be clearly communicated in the Emergency Response Plan (ERP);* *• To ensure that fire, smoke, and any release of toxic gases does not significantly impact site operatives, first responders, and the local community; and* *• To ensure that firewater run-off is contained and tested before release or, if necessary, removed by tanker and treated offsite."* As set out in **Outline Battery Safety Management Plan (OBSMP) [APP-286]**, the BESS Area will have a robust and validated Emergency Response Plan (ERP), developed in consultation with Dorset & Wiltshire Fire and Rescue Service at the detailed design stage. Section 5.4 of the OBSMP specifies the typical emergency response protocols, procedures and safety information that will be included in ERPs. ERPs will be drafted and approved for all stages of the

				Scheme, including construction, operation, and decommissioning. The Applicant's ERP template includes all requirements specified in both NFCC and NFPA 855 guidance and recommendations. Section 5 of the OBSMP covers all requisite firefighting requirements for the Scheme including fire service access, firefighting water supply, and emergency planning requirements. All risk assessments to be conducted at detailed design for BESS projects required by the Health and Safety Executive (HSE) to assess fire and explosion risk are stipulated in Section 6.1.5. All aspects of BESS safety are now globally certified and regulated by a number of established regulatory bodies; these are listed in Section 2.5 of the OBSMP. The Applicant is currently drafting a Statement of Common Ground (SOCG) with the Environment Agency (EA) on Scheme environmental protection issues including the BESS area drainage strategy. The agreed strategy document will be appended to the OBSMP at Deadline 1, to provide further assurance that all water pollution risks from a BESS fire are fully mitigated. The EA is a statutory consultee for the OBSMP and drainage strategies and must be consulted by the relevant planning authority before approving the final BSMP and drainage design at detailed design

				before construction of the BESS commences. The **OBSMP [APP-286]** is secured through Requirement 6 (Battery safety management) in Schedule 2 of the Draft DCO [APP-016], which provides that Work No. 2 must not commence until a Battery Safety Management Plan has been submitted to and approved by the relevant planning authority. The approved plan must be substantially in accordance with the Outline Battery Safety Management Plan. The Draft DCO also requires the relevant planning authority to consult with Dorset and Wiltshire Fire and Rescue Service and the Environment Agency before determining the application, and that the Battery Safety Management Plan must be implemented as approved.

RS-010	Description and DCO Process	Concerns	Wiltshire Council has unanimously rejected the scheme, a decision strongly supported by the Full Council. Parish councils and hundreds of residents have expressed the same concerns. I have seen residents reduced to tears by the changes this proposal would impose on the countryside they cherish. It is deeply troubling that a local democratic decision of this strength can be overridden by a Minister in Westminster who has not, as far as I am aware, yet visited the proposed site. Planning decisions of this magnitude must respect local democracy and uphold transparency and accountability.	The DCO process anticipates that differing views may be expressed by consultees, including local authorities, and such representations will be considered by the Examining Authority alongside all other evidence submitted. The Applicant engaged with Wiltshire Council, a host local planning authority, throughout the pre-application process and continues to do so during Examination. Matters raised by the authority have informed the development of the Scheme and the accompanying assessments and are addressed within the application documents. The Applicant will respond in detail to the local planning authority's representations through the Examination process, including via Written Representations, Statements of Common Ground and, where appropriate, at Examination hearings, to assist the Examining Authority in its consideration of the application. Lime Down Solar Park has an anticipated generating capacity of approximately 500 MW and therefore exceeds the 100 MW threshold for a Nationally Significant Infrastructure Project (NSIP). As a result, the Scheme is subject to the Planning Act 2008 and must be consented through a DCO, examined by the Planning Inspectorate on behalf of the Secretary of State for Energy Security and Net Zero, rather than determined by the local planning authority. A full description of the

				Scheme is provided in the **ES Volume 1, Chapter 3: The Scheme [APP-055].** The Applicant considers that the statutory consultation has been robust, thorough and undertaken in accordance with the requirements of the Planning Act 2008, the Environmental Impact Assessment (EIA) regulations, and the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009. The **Consultation Report [APP-022]** sets out the Applicant's approach to pre-application consultation. The Applicant notes that the examination process provides a further opportunity for interested parties to comment on the Scheme. This examination is managed by an independently appointed Examining Authority. Further to this, the Applicant provided an extended relevant representation period beyond the minimum statutory timeframe to allow sufficient time for members of the public to review the submitted application documents and register as an interested party.

RS-011	Transport and Access	Concerns raised by residents	Residents have raised many practical concerns, including increased HGV traffic on narrow single-track roads,	The potential effects of construction traffic on the local highway network are assessed in **ES Volume 1, Chapter 13: Transport and Access [APP-065]**, which considers construction vehicle movements, traffic volumes, road safety and effects on road users. This included the capacity of local roads and infrastructure to accommodate construction vehicles with consideration of construction traffic volumes, vehicle types, route suitability, and network performance. The assessment concludes that the level of construction traffic associated with the Scheme is unlikely to materially affect road safety on links within the Study Area, and no significant adverse effects on accident risk are anticipated. The assessment additionally concludes that with appropriate mitigation such as the Construction Traffic Management Plan in place to manage construction vehicle movements, there would be no significant adverse impacts on the local highway network during the construction, operation, maintenance, and decommissioning phases of the Scheme. An **Outline Construction Traffic Management Plan (CTMP) [APP-287]** has been prepared and submitted with the DCO application. The aim of the CTMP is to ensure that the effect of the construction phase on the local highway network is minimised. The **Outline CTMP [APP-287]** secures measures to coordinate construction

				deliveries by HGVs to arrive and depart between 09:30 and 16:30 where possible, to avoid peak network hours of 08:00–09:00 and 17:00–18:00. It also includes a community liaison element to keep local communities informed about the construction process and to provide a contact for feedback should any issues arise. Compliance with the CTMP will be monitored by the Developer, Contractor and Wiltshire Council as local highway authority. The preparation, approval and implementation of the final CTMP, substantially in accordance with the outline CTMP, are secured through Requirement 15 of Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring construction traffic impacts are appropriately managed throughout the construction phase of the Scheme.
RS-012	Noise and Vibration	Concerns raised by residents	noise pollution,	An assessment of the effects of the Scheme on noise and vibration is provided in **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**, with supporting technical information supplied in **ES Volume 3, Appendix 14-4: Noise Modelling [APP-237]**. The assessment considers potential noise and vibration impacts during construction, operation and decommissioning, including from solar PV panels and associated infrastructure. The conclusions of the assessment in relation to each phase of the Scheme are set out below. The conclusions of the assessments are made for the Scheme as a whole (i.e. all

				of its components combined, including the BESS), and therefore any specific component will not have any greater effects than those that have been assessed. The Applicant notes that the approach to noise and vibration has been discussed with Wiltshire Council, as described in Section 14.2 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**. In addition, further meetings have been held over the approach to the management plans, and a Statement of Common Ground will be issued and updated throughout examination <u>Construction phase</u> The noise and vibration impacts arising from construction activities are assessed in Section 14.10 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**. For the purposes of the assessment, a reasonable worst-case scenario assuming piling activities has been considered. Mitigation measures associated with construction activity, such as temporary screens and advanced warning of works, are presented in Section 14.9 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]** and are committed to through the **Outline Construction Environmental Management Plan [APP-277]**. With these measures in place, the assessment concludes that no significant effects from construction noise or vibration are expected. A noise monitoring programme agreed with Wiltshire Council will be

				carried out during construction, as committed to in the **Outline Construction Environmental Management Plan [APP-277]**. The preparation, approval and implementation of the Construction Environmental Management Plan, substantially in accordance with the **Outline CEMP [APP-277]**, is secured through Requirement 13 in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that construction noise and vibration effects are appropriately controlled. <u>Operational phase</u> The noise impacts from the operation of the Scheme and its components are assessed in Section 14.10 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**, with supporting modelling provided in **ES Volume 3, Appendix 14-4: Noise Modelling [APP-237]**. The predicted noise levels from the Solar PV Sites have been artificially increased by 3 dB to account for the increased likelihood that the noise from the Scheme would be perceived as distinct from the existing background sound. Potential mitigation measures are detailed in Section 14.9 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**, and with such measures in place, significant effects from operational noise are not expected. The **Outline Operational Environmental Management Plan [APP-278]** commits to noise levels from the Scheme at

				residential dwellings being the same as or below those modelled in the ES. This provides assurance that significant effects from operational noise will be avoided, while allowing flexibility in how this is achieved. The preparation, approval and implementation of the detailed OEMP, substantially in accordance with the outline plan, are secured through Requirement 14 of Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring operational noise is appropriately controlled throughout the lifetime of the Scheme.
RS-013	Cultural Heritage	Concerns raised by residents	impacts on the historic environment including archaeological sites such as the Fosse Way,	The potential effects of the Scheme on the cultural heritage of the Fosse Way and associated Roman archaeological assets are fully assessed in **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, supported by detailed technical appendices in **ES Volume 3, Appendices 12-1 to 12-7 [APP-219 to APP-231]**. The assessment identifies known Roman heritage assets, considers their significance, and evaluates likely effects during construction, operation and decommissioning, including effects on setting. Since the design presented at PEIR stage, Field C26, the westernmost part of Field C25, and the majority of Field C13 have been entirely removed from the Order Limits. Solar PV Panels have also been removed entirely from within Fields B1-B5, C24-C25, and C13. A number of fields abutting the Fosse Way within which Solar PV Panels will be erected

				have had offsets established with their boundaries with Fosse Way, including Fields B6, C10-C12, and C22-C23. **Appendix 12.1: Heritage Statement [APP-219]** identified that the overall setting and significance of the Fosse Way will remain intact, and the asset will retain its legibility as a roadway within a largely agrarian landscape. Consequently, no significant effects were identified to the asset. Embedded mitigation measures to avoid or reduce harm to heritage assets are set out in Section 12.9 of **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, with additional mitigation detailed in Section 12.11. An overarching archaeological mitigation strategy is provided in **ES Volume 3, Appendix 12-6: Outline Archaeological Mitigation Strategy [APP-230]**. The Applicant notes that the approach to the assessment in relation to the Fosse Way has been agreed with Historic England and the methodology for the mitigation strategy is under discussion with Historic England and is set out in the relevant Statement of Common Ground to be submitted at Deadline 1.

RS-014	Ecology and Biodiversity	Concerns raised by residents	effects on local biodiversity including protected species such as bats and dormice	Ecology and Biodiversity Potential impacts on ecology and biodiversity are fully assessed in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061].** This assessment considers baseline ecological conditions and evaluates likely significant effects arising during the construction, operation and decommissioning phases of the Scheme. It identifies avoidance, mitigation and enhancement measures to address potential impacts on habitats and protected and notable species. It also identifies opportunities for ecological enhancement, including the creation and long-term management of habitats, and delivery of biodiversity net gain. The Applicant notes that the approach to the assessment in relation to ecology and biodiversity in general is under discussion with Wiltshire Council and Natural England and is set out in the relevant Statement of Common Ground to be submitted at Deadline 1**.** During construction, specific measures are proposed to avoid disturbance and displacement of wildlife. These include protective buffers around sensitive habitats and features, timing restrictions on vegetation clearance, pre-construction ecological surveys, species-specific mitigation, and pollution prevention controls which are set out in the **Outline Ecological Protection and Mitigation Strategy (EPMS) [APP-284**]. Measures to protect trees and hedgerows are also set out in **ES Volume 1, Chapter 10:**

				Arboriculture [APP-062]. The Scheme will also result in the cessation of intensive arable farming within the Solar PV Sites. As identified in **ES Volume 1, Chapter 9 [APP-061]**, this is expected to reduce the ongoing application of herbicides and pesticides, supporting improvements in habitat quality over the operational lifetime of the Scheme. The reversion of existing arable land within the Solar PV Sites to predominantly grassland habitats can be expected to benefit a wide range of protected and notable species, as identified in **ES Volume 1, Chapter 9 [APP-061].** Mitigation and enhancement measures are detailed in the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]** and the **Outline Ecological Protection and Mitigation Strategy (OEPMS) [APP-284]**, which set out habitat creation, species protection measures, buffer zones and long-term ecological management. The preparation, approval and implementation of the detailed Landscape and Ecological Management Plan, substantially in accordance with the **OLEMP [APP-283]**, are secured through Requirement 7 in Schedule 2 of the **Draft Development Consent Order [APP-016]**. The preparation, approval and implementation of the detailed Ecological Protection and Mitigation Strategy, substantially in accordance with the **OEPMS [APP-284]**, are secured through Requirement 8 in Schedule 2 of the **Draft**

				Development Consent Order [APP-016]. These requirements ensure that ecological protection and enhancement measures are delivered and maintained throughout construction and operation of the Scheme. <u>Bats</u> Potential impacts of the Scheme on bats, including species associated with the Bath and Bradford-on-Avon Bats SAC, are assessed in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**. The assessment considers baseline bat activity, roosting, foraging and commuting habitats, and evaluates likely effects during construction, operation and decommissioning. The Applicant notes that the approach to the assessment in relation to bats is under discussion with Natural England and Wiltshire Council and is set out in the relevant Statement of Common Ground to be submitted at Deadline 1**.** The detailed assessment of likely significant impacts and effects on bats is set out in **Section 9.10** of **ES Volume 1, Chapter 9 [APP-061].** The assessment is underpinned by a comprehensive programme of bat surveys, with detailed survey methods and results provided in **ES Volume 3, Appendix 9-3: Bat Survey Report [APP-200]**. Using this evidence, the ES identifies potential impact pathways and

				appropriate avoidance and mitigation measures. The assessment concludes that, with embedded mitigation in place, no significant adverse effects on bat populations or on the integrity of the Bath and Bradford-on-Avon Bats SAC are anticipated. Mitigation measures for bats, including habitat retention, buffer distances, timing of works and protection of commuting corridors, are set out in the **Outline Ecological Protection and Mitigation Strategy (EPMS) [APP-284]** and long-term habitat management measures are detailed in the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]**. The preparation, approval and implementation of the detailed Ecological Protection and Mitigation Strategy and Landscape and Ecological Management Plan, substantially in accordance with the **EPMS [APP-284]** and **OLEMP [APP-283]**, are secured through Requirements 8 and 7 respectively in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring bat protection and habitat management measures are delivered and maintained throughout the lifetime of the Scheme. <u>Dormice</u> The detailed assessment of likely significant impacts and effects on dormice is set out in Section 9.10 of **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**. The assessment considers

				dormice on a precautionary basis, reflecting the extent and distribution of suitable habitat within the Order Limits, the potential for presence within all suitable habitats, and the likely impact on all suitable habitat as a result of the Scheme. The assessment is underpinned by comprehensive baseline of ecological surveys and habitat assessments, as detailed in **ES Volume 3, Appendix 9-1: Ecological Baseline Report [APP-199].** These surveys and assessments identified the location, extent and quality of suitable habitats for dormice, enabling the identification of potential impact pathways and appropriate avoidance and mitigation measures. The assessment concludes that, with embedded mitigation in place, no significant adverse effects on dormice populations are anticipated. Mitigation measures, including the retention and protection of suitable habitats such as hedgerows and woodland edges, the implementation of appropriate buffer distances, and sensitive timing of works, are set out in the **Outline Ecological Protection and Mitigation Strategy (EPMS) [APP-284].** Long-term habitat creation, management and enhancement measures are detailed in the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283].** This includes the creation and ongoing management of a considerable extent of new hedgerows and woodland, which can be expected to provide suitable habitat for

				dormice and strengthen connective links across the Scheme and wider landscape for dormice and other species. The preparation, approval and implementation of the detailed Ecological Protection and Mitigation Strategy and Landscape and Ecological Management Plan, substantially in accordance with the **EPMS [APP-284]** and **OLEMP [APP-283],** are secured through Requirements 8 and 7 respectively in Schedule 2 of the **Draft Development Consent Order [APP-016],** ensuring that appropriate dormice protection, mitigation and habitat management measures are delivered and maintained throughout the lifetime of the Scheme.
RS-015	Socio-Economics,, tourism and recreation	Concerns raised by residents	and the loss of agricultural jobs	The Applicant confirms that land agreements have been made with landowners who have their own contractual arrangements with tenant farmers. Whilst a worst case could therefore involve the termination of an agricultural tenancy or contract in its current form, alternative operational and management opportunities are available connected to the scheme should consent be granted. These opportunities are to be offered to existing tenants and contractors as a primary alternative. Additionally, where available, and at the discretion of the landowner, alternative land would be sought for tenants to continue their agricultural practices.

				The Applicant is cognisant of the impact the Scheme could have on wider agricultural employment associated with tenancies and contracts and so seeks to source ways of retaining agricultural workers, providing reskilling opportunities, or providing re-employment as supported by the measures secured in the **Outline Skills, Supply Chain and Employment Plan [APP-285]** by Requirement 18 of Schedule 2 to the **Draft DCO [APP-016]**.
RS-016	Description and DCO Process	Concerns raised by residents	Taken together, these concerns show the real, lived impact that the proposal would have on the community. I urge the Planning Inspectorate not to take them lightly.	A comprehensive Cumulative and In-Combination Effects Assessment has been undertaken in accordance with Planning Inspectorate Advice Note 17 and the relevant NPS EN-1, NPS EN-3 and NPS EN-5 requirements which are set out within **ES Volume 1, Chapter 21: Cumulative and In-Combination Effects [APP-074]** and associated Appendices **[APP-264].** Interaction with proposed or consented but not yet built developments has been fully explored within each of the technical assessments **[APP-059 - APP-072]** with a summary of each of these assessments provided within **ES Volume 1, Chapter 21 Cumulative and In-Combination Effects [APP-073].** Existing schemes are captured within the baseline environment. The four-stage cumulative assessment methodology is described within **ES Chapter 6 EIA Methodology [APP-058].** 358 developments were included in the Long List **[APP-264].** 41 developments are included in the short list (and are therefore assessed) including a number

				of proposed solar and BESS developments. The list of developments included in the cumulative assessment was reviewed and developed in consultation with Wiltshire Council. Table 21-8 within **ES Volume 1, Chapter 21 Cumulative and In-Combination Effects [APP-073] identifies that,** taking a conservative worse case approach, significant cumulative effects with the short list of developments are identified at a limited and discrete number of receptors comprising tourism and recreation impacts during the construction phase on Corsham Park, PRoW WT|CORM|122, long path and Sustrans Cycle Route 403, and on skylark at a District level. Skylark-specific mitigation and habitat enhancement measures are incorporated into the Scheme design to reduce effects on skylark as far as practicable and are described in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061].** These include the provision of suitably large, open set-aside and grassland habitats designed to provide suitable skylark breeding and foraging conditions. These measures are illustrated in **ES Volume 2, Figure 3-4: Landscape and Ecological Mitigation Plan [APP-084]** and detailed in the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]**. Such measures have been designed to reduce the anticipated residual effects resulting from the Scheme to a Local level of geographic importance.

RS-017	Description and DCO Process	Concerns raised by residents	This project is causing significant stress to a community that values its natural environment and is not opposed to green energy but does oppose developments of this scale for the reasons set out above	The Applicant confirms that these matters have been addressed in detail in the Applicant's Response to RS-001.
RS-018	Site Selection and Alternatives	Alternatives	There are brownfield and greyfield sites across the country that could accommodate solar development without damaging rural landscapes.	Site selection is addressed in **ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP-056]** and **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]**. Paragraph 2.10.31: *"…at this scale, it is likely that applicant's developments will use some agricultural land. Applicants should explain their choice of site, noting the preference for development to be on suitable brownfield, industrial and low and medium grade agricultural land".* **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]** explains how brownfield land, industrial land, previously developed land, and low-grade agricultural land were considered, policy. As set out in **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]** the Applicant reviewed brownfield land registers for local authorities within the area of search including Wiltshire Council, South Gloucestershire Council, Bath and Northeast Somerset Council, and Somerset Council. The assessment concluded that there were no sites within the search area of sufficient size to accommodate a large-scale solar development, either individually or

				cumulatively. The sites assessed were too small to support the proposed Scheme and were largely allocated for housing or mixed-use development, in line with local planning policies, thereby creating a conflict with the intended use for renewable energy infrastructure. Therefore, it was concluded that there was no available or suitable brownfield land for the purposes of the Scheme.
RS-019	Description and DCO Process	Conclusion	For the sake of our environment, our rural communities and the principles of responsible planning, I strongly urge the Planning Inspectorate to refuse consent for this proposal.	The Applicant confirms that these matters have been addressed in detail in the responses above.

4.7 Stop Lime Down

Table 4-7 RR-4495

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response

SLD-001	Description and DCO Process	Introduction	Stop Lime Down (SLD) (SLD Wiltshire Limited, Company Number 16326693) requests to be an interested party in the examination of the application by Lime Down Solar Park Limited for an Order granting Development Consent for the 'Lime Down Solar Project'. PINS Ref: EN010168. SLD will submit its formal Relevant Representation document by email; the email will come from info@stoplimedown.com. The formal document addresses various areas that SLD considers to be relevant to the examination of this application: Site Selection and Design, Landscape and Visual Impact, Historic Environment, Traffic and Transport, Ecology, Biodiversity, and Arboriculture, Hydrology, Flood Risk and Drainage, Agriculture, Soil, and BMV Land, Noise and Vibration, Glint and Glare, Recreational and Residential Amenity, Air Quality, Ground Conditions and Contamination, Major Accidents and Disasters, Power Generation and Infrastructure, Socioeconomics, Tourism and Recreation, Climate Change and Carbon Benefits, Cumulative effects, Lifetime of the Scheme and Temporary Development, Policy, Human Health, Draft DCO, Consultation. SLD ask the ExA to read the full contents of the formal document we have submitted by email, which we rely upon as the text of our Relevant Representation.	The Applicant notes Stop Lime Down's response and has responded in full below.

SLD-002	Description and DCO Process	Introduction	1.1.1 This representation sets out the case of Stop Lime Down ("SLD") against the application by Lime Down Solar Park Ltd ("the Applicant") for a development consent order ("DCO") for the Lime Down Solar Project ("the Application"). It is made in accordance with s.102(4) of the Planning Act 2008 ("PA 2008") and reg.4 of the Infrastructure Planning (Interested Parties) Regulations 2010, and confirms SLD's wish to register as an Interested Party for the purposes of the forthcoming examination. It outlines SLD's principal objections to the Application at the start of the examination.	The Applicant notes this comment and welcomes continued engagement with SLD.
SLD-003	Description and DCO Process	Introduction	1.1.2 The Application comprises 5 solar photovoltaic ("PV") sites known as Lime Down A, B, C, D, and E, a battery energy storage system ("BESS"), and associated development including a 22km 400kV cable connection to the substation at Melksham ("the Scheme"). The Order Limits comprise a total area of 1,237 ha, which includes all land required to deliver the Scheme. The area of the Solar PV sites, minus the cable connection, is 749.3ha.	As per the description set out in **ES Volume 1, Chapter 3: The Scheme [APP-055]** the total area within the DCO Order Limits encompasses approximately 1,237 hectares (ha). Of this, the 'Solar PV Sites' comprise approximately 749.1 ha of land, **ES Volume 1, Chapter 2: The Order Limits [APP-054]**. Around 479.5 ha of this land is proposed as being required for installation of solar PV, battery storage, and associated infrastructure. The remaining 269.5 ha would provide areas dedicated to ecological mitigation, measurable Biodiversity Net Gain (BNG) delivery, landscaping, offsets and agricultural land managed for environmental enhancement and habitat creation. Mitigation measures are set out in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060], Figure 3-4-1 to 3-4-5.2 Landscape and Ecology Mitigation Plan [APP-084]** and detailed within the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]**.

				The Cable Route Corridor, which stretches approximately 22 km from 'Lime Down D' to Melksham Substation and links together the Solar PV Sites, covers approximately 463.2 ha. Approximately 17.8 ha (of which 5.9 ha overlap with the Cable Route Corridor) is proposed for Highway Improvement Areas within which improvements to sections of the existing highway network will be completed to facilitate access to the Scheme, such as improvements to road edge and traffic management. Work will be undertaken by the Applicant and National Grid within the Existing National Grid Melksham Substation, requiring a total area of 12.8 ha. **ES Volume 1, Chapter 2: The Order Limits [APP-054]**.
SLD-004	Description and DCO Process	Introduction	1.1.3 SLD are a non-profit community campaign group made up of local residents of Wiltshire and South Gloucestershire who oppose the Scheme. SLD operates through SLD Wiltshire Limited, a company limited by guarantee (company number 16326693). SLD supports renewable energy in principle, but consider that this Scheme in this location causes too much harm to local communities and the environment. Throughout the forthcoming DCO examination, SLD will work to ensure that community concerns are clearly heard and properly considered, so that local voices and knowledge carry real weight in decisions affecting their future. SLD are	The Applicant recognises SLD's intention to participate fully in the DCO Examination and welcomes its engagement in the process.

			grateful for the opportunity to be involved in the examination and to take on this role.	
SLD-005	Description and DCO Process	Introduction	1.1.4 Within this relevant representation ("RR"), SLD has outlined its principal objections at this initial stage. SLD hope this will assist the Examining Authority ("ExA") in making an informed judgment on the principal issues for consideration during the examination stage of the NSIP consenting process. However, these submissions are not a complete picture of SLD's case, and SLD will make further written representation(s) ("WR") to the ExA as the examination unfolds, in line with s.90 PA 2008. This will include a number of reports from experts instructed by SLD. SLD will make other submissions as appropriate, including assisting with any answers it can provide to the ExA's questions.	The Applicant notes this comment.
SLD-006	Description and DCO Process	Introduction	1.1.5 SLD object to the Application, and ask that the ExA recommend to the Secretary of State for Energy Security and Net Zero ("SoS") that development consent should not be granted for the Scheme.	While the Applicant acknowledges the objection of SLD to the Scheme, the Application must be determined on the basis of the technical assessment and objective evidence presented. The **Environmental Statement [APP-052 to APP-265]** includes comprehensive assessment and mitigation across all relevant environmental topics, and the **Planning Statement [APP-267],** including Annexes A and B, demonstrates

				that the Scheme accords with applicable national and local planning policy. On this basis, the Applicant remains confident that the Scheme has been robustly assessed and that appropriate measures are in place to avoid, reduce or mitigate potential effects.
SLD-007	Site Selection and Alternatives	Site Selection and Design	2.1 Site Selection and Design 2.1.1 SLD consider that the significant harms of this Scheme in large part stem from the inappropriate location chosen for the proposal. For that reason, SLD consider the process of site selection to be important, and view the Applicant's approach as defective.	The Applicant notes this comment and disagrees that the approach to site selection is defective. Responses to the specific concerns raised by Stop Lime Down are addressed separately.
SLD-008	Site Selection and Alternatives	Site Selection and Design	2.1.2 Regulation 14 and Schedule 4 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017/572 require that the Applicant include in its Environmental Statement ("ES") "*a description of the reasonable alternatives (for example, in terms of development design, technology, location, size and scale) studied by the developer which are relevant to the proposed project and its specific characteristics*", which should include "*the main reasons for the option chosen, taking into account the effects of the development on the environment"* and *"a comparison of the environmental effects*". Along with the position at common law, and noting what is said at NPS EN-1 para 4.3.9, this is the source of the obligation to consider alternatives for NSIP development.	The Applicant's approach to site selection accords with the relevant policy requirements. In accordance with the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations), the Applicant has set out the reasonable alternatives it studied in **ES Volume 1, Chapter 4: Alternatives and Design Evolution of the Environmental Statement [APP-056]** which are relevant to the Scheme and its characteristics.

			2.1.3 Thus, the Applicant is expected to demonstrate how adverse effects have been properly considered through its choices in design, technology, location, size and scale. In relation to site selection, the Applicant is expected to demonstrate that the Scheme has been appropriately refined to take into account environmental, socio-economic, and community effects in light of the main alternatives, providing an explanation for the option it chose.	
SLD-009	Site Selection and Alternatives	Site Selection and Design	2.1.4 Chapter 4 of the ES [APP-056] and the Site Selection Assessment Report ("SSAR") [APP-185] describe the consideration of alternatives and the design evolution in relation to the Scheme. The SSAR is methodologically flawed in a number of ways which SLD will set out in its WR. Among other things it: (1) adopts an illogical approach to the selection and order of application of environmental constraints; (2) is inconsistent in applying those constraints; and (3) is inappropriately narrow in considering the Potential Development Areas ("PDA(s)") that it did identify. Providing an example of each: 2.1.4.1 Of (1), the site selection process adopted an initial set of constraints which led to the identification of four PDAs ([APP-185], section 3.2). These were rejected by the Applicant and then more permissive constraints were used ([APP-185], section 3.3). The original PDAs were not redrawn against	To clarify, the Applicant has adopted a consistent approach to its assessment of potential development areas (PDAs) because each PDA was assessed against the same standardised assessment criteria, as set out in **Annexes A and D of ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]** (SSAR). Therefore, whilst the criteria for identifying PDAs changes throughout the site selection process (focussing first on less constrained land at Stage 2, before widening the search at stage 5), the PDAs identified at each stage have been consistently assessed against the same criteria. On this basis, it is not necessary to redraw the original PDAs against the more permissive constraints identified at stage 5, because those areas of land have already been assessed. Instead, the Applicant sought to look at more land at stage 5 that had previously been

			these more permissive constraints at stage 5, nor were they or the additional six PDAs identified in stage 5 redrawn against the even more permissive constraints at stage 6 ([APP-185] section 3.4). Functionally, this has resulted in a comparison of PDAs which were not identified against the same constraints.	discounted and assess that land against the same standard assessment criteria that was used to assess the original PDAs.

SLD-010	Site Selection and Alternatives	Site Selection and Design	2.1.4.2 Of (2), a comparison of the constraint maps for PDA 9 ([APP-185], fig.19) and the Scheme in PDA 10 (the Scheme) ([APP-185], fig.20) shows both with significant perimeter pressed up against National Landscapes. Notwithstanding this, in [APP-185] Annex D Table 2, PDA 9 attracts a red rating for landscape and visual whereas PDA 10 attracts a yellow rating. Given the harm to setting of the National Landscape that the Scheme would cause, the perfunctory reasoning in Table 2 to (apparently) try and differentiate PDA 9 fails properly to explain away this inconsistency. It is notable, anyway, that only sites within National Landscapes and National Parks were excluded from the SSAR, with no attempt made to exclude sites within their settings (notwithstanding Appendix B of [APP-185] which identified landscape and visual as concerned with "*impact*", which would include setting impact).	As set out in **Annex D of ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]** PDA 9 sits immediately adjacent to the North Wessex Downs National Landscape, which is at a significantly higher elevation and would result in likely significant visual impacts due to elevated views from sensitive receptors within the National Landscape. This distinguishes it from PDA10 (the Scheme), which is not at a significantly higher elevation to the Cotswolds National Landscape and therefore is not considered to be as constrained based on the assessment criteria applied for site selection. As to sites within the settings of National Landscapes, the Applicant has not applied a buffer around National Landscapes as part of the site selection process. This is because the policy test for development within the setting of a National Landscape is different to the policy test for development within a National Landscape. For more information on the policy tests, see NPS EN-1 paragraph 5.10.32, which provides that for development within National Landscapes, the conservation and enhancement of the landscape and scenic beauty should be given great weight by the Secretary of State in deciding on applications for development consent within these areas, and goes on to set out the public interest criteria that would need to be satisfied. Whilst developments within the settings of National Landscapes are still required to show measures to seek to further the

				purposes of the National Landscape in the same way as developments within them (see NPS EN-1 paragraph 5.10.34), this is not the same policy test as required under paragraph 5.10.32. On this basis, a buffer has not been applied for the purposes of site selection, but each PDA's proximity to National Landscapes has been assessed according to the assessment criteria in **Annex A of ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]**

SLD-011	Site Selection and Alternatives	Site Selection and Design	2.1.4.3 Of (3), while the Applicant references the combination of PDAs at various points in the SSAR, it does not actually describe how this might be done and (importantly) how parts of PDAs might be carved out so that only the least harmful areas of each are combined. Looking at [APP-185] fig.25, this flaw becomes especially apparent. While PDA 4, PDA 5, and PDA 11 have constraints which individually led them to be disregarded by the Applicant, it simply did not consider whether portions of each could be combined to make a new PDA which was a reasonable alternative. This is a critical logical flaw in the analysis: locations such as this would have been closer to the National Grid connection at Melksham, have better road access, and cause less damage to the environment and local communities.	The Applicant has adopted a proportionate approach to the assessment of alternative sites within **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185].** This is in line with NPS EN-1 paragraph 4.3.22 which provides that the consideration of alternatives in order to comply with policy requirements should be carried out in a proportionate manner, and only alternatives that can meet the objectives of the proposed development need to be considered. Whilst the Applicant acknowledges it may be possible to combine land from a number of PDAs; it would not be proportionate to assess all sites in various combinations. Instead, the Applicant has sought to group land together into PDAs based on proximity of land parcels and their availability, to ensure that each PDA assessed would be deliverable. It is also noted that, in accordance with NPS EN-1 paragraph 4.3.24, the Secretary of State should not refuse an application for development on one site simply because fewer adverse impacts would result from developing similar infrastructure on another suitable site, and should have regard as appropriate to the possibility that all suitable sites for energy infrastructure of the type proposed may be needed for future proposals. Therefore, not combining the least constrained elements of various PDAs to create a less constrained array of sites does not mean that the DCO Application for the Scheme should be refused, there

				is the possibility that the less constrained elements of the other PDAs could be used for future proposals.
SLD-012	Site Selection and Alternatives	Site Selection and Design	2.1.5 While Chapter 4 of the ES suggests that there were no obviously more suitable locations within the search area than the proposed location of the Scheme, SLD disagrees. Such a statement cannot be supported because the SSAR does not provide a "*description of the reasonable alternatives*" given the logical flaws included in that document.	The Applicant considers its methodology on site selection to be appropriate and logical based on the policy tests regarding consideration of alternatives. The specific points raised in SLD's relevant representation have been addressed in specific responses.

SLD-013	Site Selection and Alternatives	Site Selection and Design	2.1.6 Indeed, while the SSAR presents a process undertaken by reference to environmental constraints, it is clear the process was driven to a large degree by commercial concerns. The Applicant essentially recognises this at para 2.6.2 of [APP-185], where it notes that it used land agents to identify *"potentially willing landowners with large scale land holdings within the 20km search area*". Similarly, the shape of the PDAs at stage 5 was driven by such considerations: "*entire land parcels suggested by land agents and therefore contain pockets of land with a steeper gradient meaning that the land parcel would not have been identified using the Stage 3 methodology*" ([APP-185], para 2.7.1.). Land agents are not environmental constraints; indeed, there is an incentive for land agents to ignore such constraints (so as to maximise financial considerations).	As detailed in **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]**, the Applicant has followed a staged approach to assessment, taking into consideration a range of planning, environmental and operational factors. The potential availability of large scale land holdings within the search area was a consideration, however it is not the only consideration in the site selection process. It is important that the Scheme should be capable of delivery, and the commercial feasibility of a development proposal is recognised as a factor in site selection within NPS EN-3, paragraph 2.10.22-24. The Applicant has sought to identify willing landowners to host the main solar infrastructure in order to minimise the extent to which it must rely on the use of compulsory acquisition powers. As discussed in **ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP-056]** and **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185], t**he first stages of the site selection assessment process involved the identification of the point of connection at the Existing Melksham National Grid Substation and to establish an area of search in which to look for sites. At stages 2 and 3, various environmental constraints were excluded from the search area, and key operational criteria were applied, in order to focus the search on the least constrained areas of land within the search area that had the potential to meet the operational objectives of the Scheme. This revealed 4 potential development areas, which were

				then assessed against standardised assessment criteria such as land use, flood risk, impacts on cultural heritage and ecological impacts. None of these areas were deemed suitable for the Scheme following assessment. Therefore, at stage 5 of the assessment, further constrained areas of land (Grade 3 agricultural land and Flood Zones 2 and 3) were added back into the search area and, with the help of land agents, further areas to assess were identified. However, those areas were assessed against the same standardised assessment criteria as used to assess PDAs 1-4. Further, additional land has been considered at a higher topographic gradient, and a check and balance exercise has been carried out across the search area to identify any other sections of land that should reasonably be considered for assessment. Therefore whilst land agents assisted in identifying land for assessment, other areas of land have also been considered. Further all potential development areas identified have been assessed against a number of factors, not just land availability.

SLD-014	Site Selection and Alternatives	Site Selection and Design	2.1.7 Ultimately, the SSAR includes post-hoc justification of the conclusions already reached by the Applicant for commercial convenience, as opposed to an assessment focused on planning and environmental constraints. Since the inception of the Scheme, an unduly constrained approach was taken to site selection, whereby the Applicant prioritised land availability by negotiating with a very small number of large landowners. As a consequence, a plainly unsuitable location has been selected, within a landscape that is highly sensitive to this form of development.	As detailed in **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]**, the Applicant has followed a staged approach to assessment., taking into consideration a range of planning, environmental and operational factors. For the reasons set out in the SSAR, the Applicant considers the Site to be a suitable location for the Scheme. As set out in the response to the previous paragraph of SLD's relevant representation, potential availability of large scale land holdings within the search area was a consideration, however it is not the only consideration in the site selection assessment process. As is typical of projects of the scale and complexity of the Scheme, design changes both to deliver the Scheme, and to minimise adverse effects as much as practicable, have been iterative. This necessarily requires continuous validation of the Scheme against the principles and approach set out in the SSAR to ensure the site, location and form of the Scheme remains appropriate against the range of factors and constraints that need to be considered. This is not a "post-hoc" approach but rather a critical part of the site selection process.
SLD-015	Landscape and Visual	Landscape and Visual - Cotswolds National Landscape	2.2.1 The sites and their surrounds are notable for their rurality and their role in the setting of the Cotswolds National Landscape ("CNL"). SLD consider that the industrialising effect of a solar development with accompanying BESS and associated infrastructure (up to 13m high) would have significant harmful landscape, noise and vibration and visual effects. SLD's landscape expert considers	Sites A, B and C are agreed to be within the setting of the CNL. The effects on the **Cotswolds National Landscape and its Special Qualities are set out in a standalone assessment in Appendix 8-6 [APP-197]**.

			this case an unusual one, given not only the harms to the landscape generally, but also to the setting of the CNL.	
SLD-016	Landscape and Visual	Landscape and Visual Assessment	SLD's expert considers that the Applicant, through defective methodology and unduly benevolent assessment, has underassessed the landscape and associated visual harms of the Scheme.	The LVIA presented in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]** has been undertaken with consideration of the appropriate and relevant guidance and robustly assesses both the landscape and visual effects of the Scheme independently to ensure both the impacts and effects on the fabric and character of the landscape are taken into account as well as the views and visibility. A detailed LVIA methodology is included within **ES Volume 3, Appendix 8-1 [APP-187]**, which has been progressed and agreed with the Local Planning Authorities.
SLD-017	Description and DCO Process	Introduction	2.2.2 SLD's expert will produce technical submissions at the WR stage that detail those flaws and explain why SLD consider this is a Scheme where the landscape and visual effects weigh substantially against permission. A summary of the main points is set out below.	The Applicant notes this comment.
SLD-018	Landscape and Visual	Landscape and Visual Assessment	2.2.3 The Applicant's Landscape and Visual Impact Assessment ("LVIA") [APP-060] predicts that during construction and the first 15 years of operation, the Scheme would give rise to significant adverse effects on landscape character and visual amenity. SLD's expert agrees with this judgement, but has concluded that levels of adverse landscape and visual effects would be higher than assumed in the LVIA.	The Applicant notes this comment.

SLD-019	Landscape and Visual	Landscape and Visual Assessment	2.2.4 However, SLD's expert does not agree with the LVIA's conclusion that after 15 years of operation, apart from at ten of the assessed viewpoints, not only would effects on character and views no longer be significant adverse, but also, effects on character would be significant beneficial. 2.2.5 SLD's expert's review and assessment concluded that a) after 15 years of operation, effects on many landscape and visual receptors would remain significant adverse, and b) there would be no landscape (nor visual) benefits.	The LVIA presented in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]** assesses the effects on landscape character within the 1, 2 and 5km Study Areas. The Applicant wishes to clarify that at no point in the assessment are Beneficial effects on Landscape Character or Visual Amenity recorded. However, it should be noted that by year 15, significant effects to Landscape Fabric have been identified. The effects on character are set out in Table 3 in **ES Volume 3, Appendix 8-3-2-2-2 - Landscape and Visual Assessment Sheets [APP-191]**. The visual effects of the Scheme are summarised in **ES Volume 3, Appendix 8-3-3 Summary of Visual Effects [APP-192].**
SLD-020	Landscape and Visual	Landscape and Visual Assessment	The reasons for the differences in judgements are partly due to different interpretations / applications of the published guidance, mainly Guidelines for Landscape and Visual Impact Assessment ("GLVIA3"), and certain shortcomings in the Applicant's LVIA's method and process. These include: 2.2.6.1 Lack of granular baseline study and analysis: the LVIA does not factor in the notable localised variations in character which occur across the study area, and omits many important value and susceptibility factors, especially strategic landscape and visual resources, functions and qualities. This has resulted in levels of landscape and visual receptor sensitivity having been underestimated, and thus levels of overall adverse landscape and visual effects having been underestimated.	The LVIA presented in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]** takes into account the effects on landscape character and visual amenity in detail and acknowledges that there would be an immediate change to the character of the Sites themselves and their immediate surroundings as they change from an area of arable farmland to solar infrastructure. The **LVIA [APP-060]** contains detailed descriptions of the character of each individual Site. **Appendix 8.4: Landscape Character Area Descriptions [APP-195]** contains details and extracts of published landscape character documents available within the Study Areas for the Scheme. Appendix 8.4 also includes interpretation and expansion of those characteristics relevant to the individual Sites, however a

				detailed identification of Landscape Character is contained within the **LVIA [APP-195]** within Section 8.8 Baseline Conditions. This is then further expanded upon, including the identification of landscape value, susceptibility and sensitivity within the assessment sheets for each of the Sites and Study Areas within **Appendix 8-3-2-2 [APP-191].**
SLD-021	Landscape and Visual	Landscape and Visual Assessment	2.2.6.2 Underestimation of visual receptor sensitivity, partly due to problems with the LVIA's criteria, again, leading to underestimation of levels of adverse visual effects. 2.2.6.3 Not having factored in the cause and nature of many of the impacts and effects likely to arise from the Scheme which could adversely affect landscape and views, resulting in underestimation of levels of magnitudes of effect, and thus underestimation of levels of overall adverse landscape and visual effects.	The LVIA **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]** has been undertaken with consideration of the appropriate and relevant guidance and robustly assesses both the landscape and visual effects of the Scheme independently to ensure both the impacts and effects on the fabric and character of the landscape are taken into account as well as the views and visibility. A detailed LVIA methodology that conforms to the landscape Institutes Guidelines for Landscape and Visual Impact Assessment (GLVIA3) is included within ES Volume 3, Appendix 8-1 **[APP-187]**, which has been progressed and agreed with the Local Planning Authorities. It is worth noting that GLVIA3 is not prescriptive, only providing guidelines for the approach to Landscape and Visual Impact Assessment (LVIA). This allows for some degree of professional differences in approach to LVIA to be incorporated into methodologies for LVIA, however the core approach and principles of any LVIA must align with GLVIA3. As stated, the Methodology for the LVIA has been progressed and agreed with the Local Planning Authorities.

SLD-022	Landscape and Visual	Landscape and Visual Assessment	2.2.6.4 Over-reliance on existing and proposed vegetation to screen views to reduce otherwise significant adverse landscape and visual effects. Note that a) not all adverse effects on landscape character can be mitigated by screening; b) not all of the identified views could or would be screened by the proposed planting; and c) the LVIA assumes that the existing on-and off-site vegetation planting would continue to screen views for the duration of the operation, which is very unlikely (for example, mature forestry plantations may be felled, mature ash trees and elm hedges are already dying). Note that where visual screening was not achieved as assumed, magnitudes of effect at Year 15 would be higher than predicted, resulting in underestimations of levels of overall adverse landscape and visual effects. The worst-case vegetation-free scenario should be adopted from the outset, and the Scheme sited and designed accordingly; or at least, the likely degree of permanence of the off-site screening vegetation upon which the LVIA relies should be assessed and factored into the studies.	The characteristic low hedges are as a result of the traditional farming practices of the area and are their management is not controlled. It is recognised that screening provided by higher hedgerows would create greater visual enclosure within the landscape and this effect has been assessed. With reference to note a) visibility is only one component of landscape character. The Assessment on Character has included the adverse changes as a result of the increased hedgerow heights. With reference to note B) it is recognised that not all effects on visual receptors, as represented by the Viewpoint Photography can be mitigated by screening. A summary of the significant effects on visual receptors are set out in LVIA Tables 8-19, 8-20 and 8-21 are set in **ES Volume 1, Chapter 8. Landscape And Visual [APP-060].** With reference to note C) due to the temporary nature of the Scheme, the changes described are unlikely to take place. Furthermore, the hedgerow regulations and Forestry Commission Felling Licences would continue to control these landscape features.
SLD-023	Landscape and Visual	Landscape Screening	2.2.6.5 Not factoring in that in itself, the proposed screen planting would give rise to adverse visual effects, in terms of a) being uncharacteristic, and / or b) resulting in the total loss of a view.	As noted above, visibility is only one component of landscape character. The Assessment on Character has included the adverse changes as a result of the increased hedgerow heights. As noted above, it is recognised that not all effects on visual receptors, as represented by the Viewpoint Photography, can be mitigated by screening. A summary of the significant effects on visual receptors are set out in

				LVIA Tables 8-19, 8-20 and 8-21 are set in **ES Volume 1, Chapter 8. Landscape And Visual [APP-060].** NPS EN-1 recognises at para 5.10.5 that "*Virtually all nationally significant energy infrastructure projects will have adverse effects on the landscape, but there may also be beneficial landscape character impacts arising from mitigation.*"
SLD-024	Landscape and Visual	Landscape and Visual Assessment	2.2.6.6 Direct effects on the sites' overall character not having been reported, only effects on what the LVIA calls the sites' 'fabric'. This is a relevant and important matter because it is central to the Applicant's claim that the proposed development would result in significant beneficial effects on the character of the sites. Firstly, this approach is not in accordance with the relevant guidance (GLVIA3). Secondly, the LVIA predicts that by Year 15 of operation, "*there is likely to be a moderate beneficial effect on existing landscape fabric, which is considered to be significant*". However, this conclusion erroneously assumes that mitigation measures can be double-counted as enhancements. Thirdly, the direct effects on the overall character of the sites would be significant adverse, and could not be mitigated.	It is fully acknowledged that at the Site level, the character of the Site itself (where there is infrastructure) would be Significantly Adversely affected with the land now presenting as a large scale solar scheme, as with the development of any green field Site. At the point the Scheme is decommissioned the landscape proposals would help provide the long term legacy landscape benefits as set out within the **LVIA [APP-060]**.The proposed planting has been designed to provide greater enclosure across the individual Sites to help minimise the appreciation of the Scheme and to mitigate wider ranging adverse effects of the infrastructure on the character of the receiving landscape. This enclosure helps mitigate and therefore reduces the level of effect associated with the Scheme. However, the LVIA recognises that despite this, as a consequence of the development adverse effects would remain until the Scheme was decommissioned. It is acknowledged that the character of the Site itself, and its immediate surroundings would be adversely affected, with the land now presenting as a large scale solar scheme. At no point does the LVIA identify beneficial effects to Landscape Character

				to the individual Sites, or to the character of the wider landscape as a consequence of the Scheme. At the point the Scheme is decommissioned the landscape proposals help provide the long term legacy landscape benefits as set out within the **LVIA [APP-060].** Landscape Fabric relates to the individual tangible elements or features of the landscape, such as landform, woodland, hedges, tree cover and vegetation for example, which can be described and quantified. These physical elements and features within each of the solar Sites are predominantly retained with very low levels of hedgerow removal relating to access tracks where existing gaps cannot be utilised. The LVIA assesses Beneficial effects on the Landscape Fabric of the Sites, as a result of the extensive landscape mitigation measure, which would reduce the adverse effects of the Scheme on the character or the wider landscape he extensive mitigation measures are shown in Table 8-18 of the LVIA presented in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060].** NPS EN-1 recognises at para 5.10.5 that mitigation can result in beneficial impacts to landscape character: "*Virtually all nationally significant energy infrastructure projects will have adverse effects on the landscape, but there may also be beneficial landscape character impacts arising from mitigation.*"

SLD-025	Landscape and Visual	Cumulative Landscape and Visual Effects	2.2.7 In SLD's landscape expert's opinion, the LVIA's assessment of cumulative landscape and visual effects (both inter- and intra-project) is unsatisfactory. It does not provide an accurate indication of the extent and levels of adverse cumulative effects, which would be greater and higher than the LVIA predicts. 2.2.7.1 This will be explained further in WRs, but for example, [APP-187] ES Volume 3, Appendix 8-1 LVIA Methodology para 2.33 states that the LVIA assessed effects in-combination with "*similar developments, these being solar projects in the local area".* However, Table 21-4 of [APP-073] ES Volume 1, Chapter 21 Cumulative and In-combination Effects sets out the shortlist of developments to be considered in the cumulative assessments. As well as solar, the list includes BESS, residential, commercial, road infrastructure, and other types of development of relevance to cumulative effects on landscape and views. It is not clear whether the LVIA did include these developments, and this requires clarification. 2.2.7.2 Most importantly, the LVIA's assessment of cumulative landscape and visual effects relies on conclusions about the Scheme's landscape and visual effects, which, as explained above, are flawed, and therefore cannot be relied upon. 2.2.7.3It must also be borne in mind that – as GLVIA3 makes clear (e.g. at para. 7.17, 3rd bullet point) – taken individually / separately, effects may not be	As set out within Section 8.13 of **ES Volume 1, Chapter 8 Landscape and Visual [APP-060],** the cumulative schemes contained within both the long-list (**ES Volume 3, Appendix 21-1 Long List of Cumulative Developments [APP-264]** and the short-list (Table 21.4, **ES Volume 1, Chapter 21 Cumulative and In-Combination Effects [APP-073]**) have been reviewed and considered for their potential for cumulative interaction and effects. Based on the review, schemes that have the potential for cumulative effects were then identified and included within the LVIA cumulative assessment. The list of schemes identified is provided within Table 8-31 in the LVIA presented in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**. The list identifies the 'Included Cumulative Development Sites' that have the potential to give rise to cumulative effects and are therefore assessed in the Cumulative Landscape and Visual Assessment.

			categorised as "*significant*"; however, when combined / experienced as a whole, they may become "*significant*".	
SLD-026	Landscape and Visual	Panel Height	2.2.8 SLD also notes that the adverse effects of the Scheme are amplified by the design parameters providing for the general use of tracker solar panels with a maximum height of 4.5m AGL ([APP-055] at p.7). While not unique, the SLD believes use of such panels in the UK is unusual and would result in higher levels of adverse effects (particularly on landscape and views, but also on several other subject areas) than smaller non-tracking panels.	The height of the solar PV panels has been assessed using clearly defined design parameters, including a maximum height of 4.5 metres above ground level at maximum tilt, as set out in **ES Volume 1, Chapter 3: The Scheme [APP-055]**. These parameters represent a realistic worst-case scenario for the purposes of the Environmental Impact Assessment. The landscape and visual effects of the Scheme, including the effects of the maximum panel height, are assessed in the Landscape and Visual Impact Assessment (LVIA) presented in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**. The LVIA assesses

				effects on identified landscape and visual receptors during construction, operation and decommissioning, using the maximum design parameters to ensure a robust assessment. Mitigation measures to address landscape and visual effects, including measures that reduce the perceived height and prominence of panels in views, are set out in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060], Figure 3-4-1 to 3-4-5.2 Landscape and Ecology Mitigation Plan [APP-084]** and detailed within the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]**. These include new and enhanced planting, retention of existing hedgerows and woodland, and landscape integration measures to reduce visual effects over time. The preparation, approval and implementation of the detailed Landscape and Ecological Management Plan, substantially in accordance with the **OLEMP [APP-283]**, are secured through Requirement 7 in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that the identified mitigation measures are delivered and maintained throughout the lifetime of the Scheme.
SLD-027	Landscape and Visual	Landscape and Visual Assessment	2.2.9 In SLD's opinion, the Applicant's LVIA will need to be revised to factor in the above, and other matters that will be raised in SLD's WRs.	The Applicant has confidence in the robustness of the assessment in the LVIA.

SLD-028	Landscape and Visual	Landscape and Visual Assessment	2.2.10 SLD's landscape expert's preliminary review also raises concerns about the Applicant's photomontages. 2.2.10.1 Firstly, they do not show the worst-case scenario of winter Year 15. 2.2.10.2Secondly, none of the photomontages illustrate the changes that would be experienced by people travelling along PRoWs crossing the solar sites. This does not represent the worst-case scenario, and additional photomontages from viewpoints along PRoWs crossing the sites should be produced, at locations to be agreed through consultation, especially with local residents. 2.2.10.3 Thirdly, the effects of light conditions on the PV arrays are not factored into the photomontages.	With reference to point 1; the photomontages displayed within **ES Volume 2, Figure 8-14 Baseline Photography and Photomontages [APP-103 – APP-105]** and revision **ES Volume 2, Figure 8-14 Baseline Photography and Photomontages [AS-001]** show summer and winter photography and photomontages in summer and winter. With reference to point 1: Table 8-20 of the LVIA PRESENTED IN **ES VOLUME 1, CHAPTER 8: LANDSCAPE AND VISUAL [APP-060]** summarises the significant visual effects on Public Receptors. Major/Moderate and Moderate Adverse effects were recorded for 27 Public Rights of Way. It is not considered to be proportionate to provide photography and photomontages for every receptor and considered that the submitted photography is representative of the Scheme and the photography provided from the agreed viewpoints are suitable to assist the reviewer's and decision maker's understanding of the both the visual landscape context of the Scheme. The Applicant notes the other comments.
SLD-029	Landscape and Visual	Cotswolds National Landscape	2.2.11 SLD's landscape and other experts consider that the proposal has the potential to give rise to significant adverse effects upon the Cotswolds National Landscape designation and its setting. Two of the five sites, Lime Down A and Lime Down C, are located directly adjacent to the CNL boundary. That the	Sites A, B and C are agreed to be within the setting of the CNL. The effects on the Cotswolds National Landscape and its Special Qualities are set out in a standalone assessment in **Appendix 8-6 [APP-197].**

			solar panels may have been stepped back from the sites' boundaries in places is of only limited benefit in circumstances where the Scheme is so present and visible in that setting. National Landscapes have *"the highest status of protection"* in relation to natural environment issues (NPPF, para 189). SLD's experts consider that the Applicant has failed to reflect and respect the height of that protection.	
SLD-030	Landscape and Visual	Cotswolds National Landscape	2.2.12 The effects upon the Cotswolds National Landscape have been assessed in the ES at [APP-197]. The LVIA downplays the extent of visibility of the Scheme in views from within the CNL, and looking towards it from within and outside of the sites. Furthermore, over-reliance is placed upon existing and proposed vegetation to screen views from and towards the CNL, and mitigate the impact upon the CNL's setting: non-visual aesthetic and perceptual effects on character are not properly accounted for. 2.2.13 Overall, the sensitivity of the landscape setting of the Cotswolds National Landscape has been underestimated, especially the value of its contribution to the CNL. As a result, the supposed benefits to the CNL summarised at table 18 of [APP-197], which SLD considers to be improperly inflated in any event, are outweighed by the harms to the designated landscape.	It is agreed that the effects on the Cotswolds National Landscape have been assessed in ES Volume 3, Appendix 8-6 Assessment of Effects on the Cotswolds National Landscape and its Special Qualities **[APP-197].** The standalone assessment provides a robust assessment of views to and from the Scheme. The applicant considers that the effect of existing and proposed vegetation to screen views from and towards the CNL has been robustly assessed. The non-visual aesthetic and perceptual effects on character are appropriately considered and are also assessed within the assessment of effects on the Special Qualities of the CNL is Section 3 of **[APP-197].** The Sensitivity of the CNL and Sites A, B and C within the setting of the CNL are appropriately assessed and justified. Table 18 of **[APP–197]** provides a summary of effects on the CNL's Special Qualities and Table 17 of **[APP-197]** provides a summary of the mitigation quantities within the Setting of the CNL (within Sites A, B and C).

SLD-031	Landscape and Visual	Cotswolds National Landscape	2.2.14 The existing landscape is characterised by low hedges (c. 2.5m maximum), allowing for distant views; hence, the proposed mitigation by screening would in itself result in adverse effects on character and views.	The Applicant recognises that low hedgerows are characteristic of the landscape which allow distant views in places. However, it is also recognised that not all hedgerows are managed low and the dispersed nature of the Sites and the characteristic rolling topography limits the visibility of the scheme. Although existing and proposed new hedgerows are to be managed at 4.5m, on the edge of the CNL where fields are retained for positive enhancement, hedgerows would be retained at their current height to maintain views across the landscape from the CNL.
SLD-032	Landscape and Visual	Cotswolds National Landscape	2.2.15 An important feature of the CNL setting is that it hosts routes used by the public to travel to and from the CNL itself. One such key route is the iconic Fosse Way, which traverses the study area, much of the route locally being within the CNL. The Fosse Way runs through the Scheme for a distance of c. 4.5km. As explained below, this is a key route, yet SLD consider that the harms to the Fosse Way have been substantially underestimated. This provides one example where the supposed contribution of the Scheme to the special qualities of the CNL unravels (e.g. Special Quality 13, [APP-197] para 3.4.98).	The Fosse Way runs through the Scheme, outside of the CNL. Panels have been removed from the Scheme along the Fosse Way as part of the iterative design process and in response to consultation.
SLD-033	Landscape and Visual	Cotswolds National Landscape	2.2.16 The methodological concerns set out above in respect of landscape and visual impact generally apply equally to the Applicant's assessment of the CNL. Importantly, National Landscapes must be afforded "*extra protection due to their statutory purpose*" (NPS EN-3, para 2.10.157). SLD considers that the	The LVIA process is iterative and as a result, the design of the Scheme has changed to respond to the findings of the assessment to ensure that landscape mitigation is fully considered as part of the process within the environmental masterplan. This has involved setting out the key elements of constraint within

			Applicant has not given that *"extra protection"*.	parameter plans and adopting the mitigation hierarchy in accordance with GLVIA3. This has taken account of the context and features of the land within the Order limits, nearby sensitive receptors and assets, information emerging from environmental surveys, feedback from stakeholders, and opportunities and constraints in order to develop a good design that balances the need to maximise the energy generation capacity of the Scheme, with the avoidance and mitigation of impacts, and provision of environmental and other enhancements, where practicable. With regards to the Cotswolds National Landscape (CNL), the **LVIA Appendix 8-6 [APP-197]** sets out specific avoidance measures to protect the CNL. This includes the avoidance of infrastructure to the boundary of the CNL as well as further removal of panels following Consultation, within the setting of the CNL in Sites A, B and C where there is a strong visual relationship between the CNL and the Scheme. This includes: • Site A: The northern part of fields A1, A11 and A12. • Site B: B12. • Site C: C1, C6, C8, part of C9 and the majority of C10. Panels in C2, C3 and C4, where significant visual effects on receptors within the CNL were recorded at PEIR were subsequently removed from the Scheme following Statutory Consultation with the CNL. Furthermore, the CNL Management Plan as well as its and Wiltshire's Nature Recovery Strategy

				have informed the approach to mitigation and positive enhancement. It should be noted that NPS EN1 at para 5.10.34 states: "*the fact that a proposed project will be visible from within a designated area should not in itself be a reason for the Secretary of State to refuse consent*".
SLD-034	Landscape and Visual	Cotswolds National Landscape	2.2.17 Finally, SLD has significant concerns about the compliance of the Scheme with s.85 of the Countryside and Rights of Way Act 2000 duty to "*further the purpose of conserving and enhancing the natural beauty*" of the CNL. Given the harms identified above, and which SLD consider need to be explored through the examination, it is hard to see how the Scheme gives proper regard to this issue.	Throughout the iterative design process appropriate multipurpose avoidance and mitigation measures have been incorporated into the development of the layout. These mitigation measures have been embedded into the Scheme design and have looked to modify the scale and layout of the Scheme or introduce appropriate interventions in order to reduce significant adverse effects and to ensure compliance with planning policy for the CNL. These measures include the removal of panels within the setting of the CNL in Sites A, B and C where there is a strong visual relationship between the CNL and the Scheme. This includes: •Site A: The northern part of fields A1, A11 and A12. •Site B: B12. •Site C: C1, C6, C8, part of C9 and the majority of C10. Rather than being removed from the Scheme these fields are proposed for positive enhancement to further the purposes of the CNL and includes: •The creation of wildflower meadows on the edge of the CNL within the northern part of A1, C1, C6, C8, the southwestern part of C9 and B12; •The inclusion of wildflower meadow verges on the edge of set aside land in

				A11, A12 and C10 to provide attractive buffers in views from public roads; and •Hedgerow enhancements These enhancements are considered to go beyond mitigation measures.
SLD-035	Cultural Heritage	Impact on Heritage Assets	2.3.1 SLD considers that the heritage sensitivities associated with the Scheme are complex and often overlap with numerous assets as well as other environmental considerations. In untangling these to understand the effects of the Scheme on the historic environment, SLD's expert considers that there is a consistent failure properly to assess the impacts on the heritage assets. 2.3.2 The relevant NPSs include a number of requirements in respect of the historic environment. In addition to the need to identify potentially affected heritage assets and assess their significance and any contribution to this from their setting, emphasis is placed on mitigation with the need to give consideration to steps that can be taken to ensure heritage assets are conserved in a manner appropriate to their significance, including the impact of proposals on views important to their setting (NPS EN-3 para 2.10.117). The importance of applicants taking account of the results of historic environment assessments in their design proposals is also required (NPS EN-3 para 2.10.116). Additionally, the need to take into account	The Applicant respectfully disagrees with the assertion that there is a consistent failure to properly assess impact on heritage assets caused by the Scheme. The potential effects of the Scheme on designated assets are assessed in **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, supported by **ES Volume 3, Appendix 12-1: Heritage Statement [APP-219]**. The assessment identifies baseline heritage assets, considers their significance, and evaluates likely effects during construction, operation and decommissioning, including effects on setting. As detailed in Section 12.3 of **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, the cultural heritage assessment follows appropriate legislation, policy and guidance including the overarching NPS for Energy (EN-1) (January 2024), NPS for Renewable Energy Infrastructure (EN-3) (January 2024), the Wiltshire Core Strategy (2015), as well as guidance provided by Historic England and the Chartered Institute for Archaeology. The assessment has informed Scheme

			possible impacts, including cumulative, on the wider historic environment is a further consideration (NPS EN-1 para 5.9.9). 2.3.3 It is the view of SLD's expert that the approach to the Scheme is not adequately heritage-led as it fails to address, understand, and therefore consequently appropriately mitigate setting impacts on numerous heritage assets. As heritage assets of up to the highest significance would be affected, it follows that mitigation measures should be comparatively sensitive and respectful.	design, with embedded mitigation measures to avoid or reduce harm set out in Section 12.9 of **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, with additional mitigation measures detailed in Section 12.11 where required. Assessment work has been undertaken in consultation with Wiltshire Council and Historic England. (See Table 12-2 of **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**). The Applicant is continuing to discuss and look to agree the approach to mitigation with both parties. Identified impacts to designated assets would be indirect and related to elements of their setting that contribute to their significance. The assessment work which has been used to inform **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, meets the criteria set out by Overarching NPS for Energy (EN-1) (January 2024), NPS for Renewable Energy Infrastructure (EN-3) (January 2024), the Wiltshire Core Strategy (2015), as well as guidance provided by Historic England and the Chartered Institute for Archaeology (see Section 12.3 of **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**).

SLD-036	Cultural Heritage	Archaeology	2.3.4 With regard to archaeological remains, SLD's expert has concerns that setting impacts are insufficiently considered on buried remains. They also note that further information is required to fully understand the extent of below ground archaeological remains which would be impacted by the Scheme. It is considered that until this information (such as the full geophysics result) is provided a full evaluation cannot be given.	The assessment work which has been used to inform **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, meets the criteria set out by Overarching NPS for Energy (EN-1) (January 2024), NPS for Renewable Energy Infrastructure (EN-3) (January 2024), the Wiltshire Core Strategy (2015), as well as guidance provided by Historic England and the Chartered Institute for Archaeology (see Section 12.3 of **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**). The contribution of setting was considered in understanding the significance of buried archaeological remains identified within the Scheme. The significance of archaeological assets is largely derived from their evidential value. Where setting was considered to contribute to the significance of buried archaeological remains, any impacts to elements of their setting that contribute to their significance has been assessed (i.e. Fosse Way). Interim trial trenching reports were submitted as part of the **DCO Application [APP-225 to APP-229]** and full trial trenching reports will be submitted, in advance of determination. An interim geophysical survey report of the Cable Route Corridor was submitted as part of the **DCO Application [APP-224]** and a report covering the geophysical survey of the cable route will be submitted, in advance of determination.

SLD-037	Cultural Heritage	Cultural Heritage Assessment and Scoping	2.3.5 From an initial review of the ES, SLD anticipates the following issues will be taken in relation to the historic environment, and SLD's expert will produce an expert submission at the relevant time: • The Applicant's scoping exercise and the under-inclusive approach to assessment; • Inconsistency and underestimation of the sensitivity and significance of heritage assets; • Insufficient detail and assessment of the relationship of the areas of the Site with the setting of assets. Setting relationships have been consistently understated (with insufficient detail to support conclusions) so impacts made by the Applicant are not a fair assessment. Focus is on inter-visibility rather than other aspects of setting which are equally as relevant; and • The suitability and effectiveness of the proposed mitigation measures.	The Applicant notes SLD's comments and will await SLD's expert submission on the topics listed. The approach to scoping, assessment, and mitigation of effects on the historic environment is set out in **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**. The assessment identifies relevant heritage assets, considers their sensitivity and significance, and assesses potential effects on their significance, including the contribution of setting. The assessment work meets the criteria set out by Overarching NPS for Energy (EN-1) (January 2024), NPS for Renewable Energy Infrastructure (EN-3) (January 2024), the Wiltshire Core Strategy (2015), as well as guidance provided by Historic England and the Chartered Institute for Archaeology (see Section 12.3 of **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**). Annex 1 of **ES Volume 3, Appendix 12-1: Heritage Statement [APP-219]** details assets scoped in for assessment and was used during consultation with Historic England and Wiltshire Council. Scoped in assets are considered to be agreed with both stakeholders. Where required appropriate mitigation is proposed. See Section 12.9 of **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]** for embedded mitigation and Section 12.11 for additional mitigation. An overarching archaeological mitigation strategy is provided in **ES Volume 3, Appendix 12.6**

				Archaeological Mitigation Strategy [APP-230].

SLD-038	Cultural Heritage	Cultural Heritage Assessment and Scoping	2.3.6.1 The scoping of assets relied predominantly on the distance of assets from the site boundary. This is not considered to be sufficiently robust or thorough given the scale of the development proposed. Instead, a suitably robust and detailed Zone of Theoretical Visibility ("ZTV") should have been used to set the entire scope of heritage assets for further assessment (as would have been expected). Importantly, visibility is only one aspect of the scoping exercised: assets should only be scoped out where it can be demonstrated that the site does not contribute to the setting and significance of the assets. This can only be determined following an initial assessment of each asset and understanding of the contribution of the site to the setting of each asset, remembering that setting encompasses far more than physical visibility. Such an approach risks under-inclusion with little justification. It is also noted that the distances involved were not provided for the relevant listed assets. 2.3.6.2 There is little evidence that wider assets were considered, for example the ZTV indicates visibility from Malmesbury Abbey and the Conservation Area there. A site visit conducted by SLD's heritage expert in December 2025 also indicated potential visibility from the Malmesbury Conservation Area, but the ES provides no evidence this was considered in scoping.	As detailed in Section 12.5 of **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, the approach to scoping heritage assets was based on a combination of study areas, professional judgement, site visits, consultation with stakeholders, and the use of Zone of Theoretical Visibility (ZTV) mapping, employed to identify assets with the potential to be affected by the Scheme. ZTVs produced to support **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]** with a 5 km radius were prepared to inform the scoping exercise and to identify where the Scheme may be theoretically visible (see **[APP-096] and APP- [097]**). These were used alongside professional judgement, informed by site visits and consultation with Historic England and Wiltshire Council, to identify those assets where a potential effect on setting could arise. Study areas of up to 2 km for designated and non-designated heritage assets were used to identify the baseline resource, with designated assets beyond this distance also reviewed where appropriate. Assets were only scoped out where it was concluded, based on evidence and professional judgement, that the Scheme would not contribute to their setting or significance. Annex 1 of **ES Volume 3, Appendix 12-1: Heritage Statement [APP-219]** details assets scoped in for assessment and was used during consultation with Historic England and Wiltshire Council. Scoped in assets are considered to be agreed with both stakeholders. While it is noted that Malmsbury Abbey and Conservation Area

				are located on a prominent position and are visible within the wider landscape, there is no relationship with land within the Scheme and the Assets and consequently they were scoped out of the assessment.
SLD-039	Cultural Heritage	Cultural Heritage Assessment and Scoping	2.3.6.3 The Applicant's site visits were undertaken during periods of time when vegetation was in leaf and the proposed solar park would have been the most screened (in October 2023, April 2024 and July 2024, [APP-219], para 3.4.1 and as referred to in [APP-064], para 12.5.1). The scoping exercise should have been based upon a reasonable worst-case scenario – i.e. with the site visit being carried out during winter months when trees and other vegetation were not in leaf and there was maximum visibility.	Site visits as detailed were undertaken in different seasons to understand the assets and their surrounding environs with consideration to the seasonal difference to vegetation. Visualisations produced as part of the **LVIA [APP-103 to APP-104]** were also used to inform **ES Volume 1, Chapter 12: Cultural Heritage [APP-064], supported by Appendix 12.1: Heritage Statement [APP-219]**, include both summer and winter photography and as

				such show seasonal screening differences.
SLD-040	Cultural Heritage	Cultural Heritage Assessment and Scoping	2.3.6.4 The information provided in the Heritage Scoping Tables is incomplete and does not provide a sufficient basis for scoping out several of the assets. The reasons for scoping out a significant number of the heritage assets are insubstantial or not properly reasoned ([APP-219], Appendix 1). For example, Parish Church Grade II* (listing entry 1023199) is scoped out of further assessment even though the notes state that further assessment may be required.	A through scoping exercise was undertaken and is informed by professional judgement, site visits, consultation with stakeholders, and the use of Zone of Theoretical Visibility (ZTV) mapping as detailed in Section 12.5 of **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**. Annex 1 of **ES Volume 3, Appendix 12-1: Heritage Statement [APP-219]** details assets scoped in for assessment and was used during consultation with Historic England and Wiltshire Council. Scoped in assets are considered to be agreed with both stakeholders.
SLD-041	Cultural Heritage	Cultural Heritage Assessment and Scoping	2.3.6.5 The basis for determining whether further detailed assessment is considered necessary is limited to the direct intervisibility between the heritage assets listed and the proposed solar park. The scoping exercise has not taken into account wider setting contributions, nor views across or including both the heritage asset and the proposed solar park from other locations in the area, despite such being clearly recommended by guidance.	A thorough scoping exercise was undertaken and is informed by professional judgement, site visits, consultation with stakeholders, and the use of Zone of Theoretical Visibility (ZTV) mapping as detailed in Section 12.5 of **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**. Annex 1 of **ES Volume 3, Appendix 12-1: Heritage Statement [APP-219]** details assets scoped in for assessment and was used during consultation with Historic England and Wiltshire Council. Scoped in assets

				are considered to be agreed with both stakeholders. Assets were scoped in where a potential impact to their significance was identified in line with appropriate guidance as detailed in Section 12.3 of **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]** (i.e. Historic England GPA 3)
SLD-042	Cultural Heritage	Cultural Heritage Assessment and Scoping	2.3.7 SLD's expert considers that further non-intrusive surveys are needed to properly assess the heritage significance of the development areas. The Cultural Heritage Report fails to justify why a further evaluation of the Development Area was not undertaken. Given the PEIR established that surface finds of a prehistoric, Roman and medieval date have been recorded within the site boundaries, an additional archaeological evaluation by means of systematic fieldwalking was warranted, or should have at least been considered.	**ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, supported by appendices in **Volume 3 (12.2 to 12.5) [APP-220 to APP-230]** has assessed the potential impact of the scheme on identified archaeological assets. Numerous archaeological sites have been identified through desk-based research (**Volume 3, Appendix 12.2: Archaeological Desk-Based Assessments [APP-220 to APP-221**]) and archaeological evaluation (Appendix 12.3: Air Photo and LiDAR Mapping and Interpretation, Appendix 12.4, Archaeological Geophysical Survey Reports, and **Appendix 12.5: Interim Evaluation Trial Trenching Reports [APP-222 to APP-229**]). The approach to the evaluation works is in line with appropriate policy and guidance (see Section 12.3 of **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**) and was agreed with Wiltshire Council. All archaeological evaluation work has been undertaken in line with Written Schemes of Investigation, which were agreed with Wiltshire Council.

				The Applicant respectfully disagrees that there is any evidence to suggest the need for further non-intrusive surveys such as fieldwalking.
SLD-043	Cultural Heritage	Below Ground Heritage Assets	2.3.8 In a number of instances, the Applicant has materially undervalued the significance and sensitivity of below ground heritage assets which raises concerns over the impact assessment.	The Applicant respectfully disagrees with the comment. The potential effects of the Scheme on below ground heritage assets are fully assessed in **ES Volume 1, Chapter 12: Cultural Heritage [APP-064],** supported by detailed technical appendices in **ES Volume 3, Appendices 12-1 to 12-7 [APP-219 to APP-231].**
SLD-044	Cultural Heritage	Built Heritage Assets	2.3.9 SLD's expert is also particularly concerned about the lack of detailed and thorough consideration of the impact on a number of especially valuable assets for which the Scheme is the setting. Throughout, the Applicant focuses wholly on the intervisibility of the Scheme and fails to consider fully the wider setting contribution the site may have for the asset in question. This includes Bradfield Manor, which in consultations has been the subject of significant concern. Such assets are associated both with their rural and agrarian setting but, also (in the case of Bradfield Manor) Bradfield Wood (the connection to which would be interceded by PV panels). Similarly, as was noted in the landscape and visual amenity section above, the relationship of the Fosse Way Roman Road with both the CNL and also the Scheduled Roman Settlement to its northeast would face a complete change in local character.	**ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, supported by **Volume 3, Appendix 12.1: Heritage Statement [APP-219]**, has assessed the potential impact of the scheme on built heritage assets. No direct impacts have been identified to built heritage assets. Identified impacts to built heritage assets would be indirect and related to elements of their setting that contribute to their significance, which although not limited to includes a consideration of the intervisibility between the asset and the Scheme. Since the design presented at PEIR stage, Field C26, the westernmost part of Field C25, and the majority of Field C13 have been entirely removed from the Order Limits. Solar PV Panels have also been removed entirely from within Fields B1-B5, C24-C25, and C13. A number of fields abutting the Fosse Way within which Solar PV Panels will be erected have had offsets established with their boundaries with Fosse Way, including Fields B6, C10-C12, and C22-C23.

				Appendix 12.1: Heritage Statement [APP-219] identified that the overall setting and significance of the Fosse Way will remain intact, and the asset will retain its legibility as a roadway within a largely agrarian landscape. Consequently, no significant effects were identified to the asset. Likewise, no impact was identified as a result of the Scheme to the Scheduled Romano-British settlement, earthwork enclosure and a section of the Fosse Way, 415m west of Whatley Manor (NHLE reference 1013354). As stated in **Appendix 12.1: Heritage Statement [APP-219]** when considering the contribution of setting to the significance of the Grade I Listed Bradfield Manor (NHLE: 1198808), the asset is largely defined and experienced from within the Bradfield Manor grounds, in particular the walled courtyard to the south-west of the asset, where the full architectural interest of its south-facing primary elevation can be appreciated. Lime Down D is located within agricultural land to the north of asset. Following advice provided by Historic England panels in Field D5 were set back away from Grade I Listed Bradfield Manor and enhanced screening is proposed along existing hedgerows. Views of the proposed BESS and 400 kV Substation from Bradfield Manor Farmhouse will be largely mitigated by the proposed new woodland belt along the south-eastern boundary of Field D3 which, in combination with the existing woodland block west of D1 and south of D22, provides extensive screening in views to

				and from Bradfield Manor Farmhouse. It was identified that there would be a moderate / minor (not significant) adverse effect to the asset (less than substantial harm at the lower end in NPPF terms) as a result of indirect (i.e. setting) impacts.
SLD-045	Cultural Heritage Landscape and Visual	Cultural Heritage Assessment	2.3.10 SLD's expert is very concerned with the incomplete assessment of Badminton RPG (Grade I) and Rodbourne Conservation Area, and raises concerns over the lack of winter views considered in the assessment of the Alderton Conservation Area and St Giles Church (Grade I).	Visualisations produced as part of the **LVIA [APP-103 to APP-104]** were used to inform **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, supported by **Appendix 12.1: Heritage Statement [APP-219],** include both summer and winter photography and as such show seasonal screening differences. Additional Heritage viewpoints were used to inform the assessment, a list of these is provided in Annex E of Appendix 12.1: **Heritage Statement [APP-219].** With consideration to Rodbourne Conservation Area, embedded mitigation including the removal of Fields E5 and E8 from the Scheme Order Limits, removal of panels from Fields E7, E9 and E10, offsets to the PROW and enhanced screening of existing hedgerows are considered sufficient mitigation to remove any adverse impacts to the Conservation Area. As stated in Section 3.7 of the **Outline Construction Environmental Management Plan [APP-277],** construction traffic routes have been identified to avoid large increases in HGV movements near to heritage assets.

				Highway improvement works would cause at most temporary construction effects and would not result in harm to the Conservation Area's significance. Therefore, a neutral effect was identified as a result of the Scheme to the Conservation Area. The Applicant visited land to the east of the Badminton Estate on 28th March 2025 with Historic England. It was agreed that the landscape character was distinctly different in the Scheme to the Cotswolds National Landscape Area, in which the Badminton Estate lies. No impact has been identified to this designated heritage asset, and this conclusion was agreed with Historic England.
SLD-046	Cultural Heritage	Cultural Heritage Assessment and Scoping	Further, Corsham Court (Grade II*) has been scoped out of assessment despite the cable corridor running within 250m of this highly designated asset; the impact to this asset must be considered in more depth given the likely contribution of the land included in the cabling route to its setting. These omissions throw uncertainty onto the robustness of the ES Chapter and assessment carried out.	A small section of the north-east section of the Grade II* Listed Corsham Court Registered Park and Garden (RPG) extends within the 250m buffer of the cable route corridor. The asset was scoped out of detailed assessment as there was no potential for impacts as a result of the installation of cabling in the cable route corridor due to the temporary nature of the works. As stated, above a through scoping exercise was undertaken for heritage assets and assets scoped out

				of assessment were agreed with Historic England and Wiltshire Council.
SLD-047	Transport and Access	Traffic Impacts	2.4.1 The area in which the Scheme is situated is notable for its narrow rural lanes, which are well-used by pedestrians, cyclists and equestrians not only from the local communities, but also visitors from further afield. Many people are extremely concerned about the traffic implications of the Scheme, which poses a risk of significant disruption, and potential injury / fatality. As a result, SLD has instructed a traffic expert who will be considering the Application. The points set out below will be elaborated upon and evidenced in SLD's WR. The principal issues relevant to traffic and transport matters are the following: • Effects on traffic and transport during construction (including installation of the cable), operation and decommissioning, including whether the proposed development would enhance active, public and shared transport provision and accessibility. • Adequacy of assessments and suitability and effectiveness of proposed mitigation measures.	The Applicant has undertaken an assessment of potential transport and access impacts of the Scheme in **ES Volume 1, Chapter 13: Transport and Access [APP-065]**. This included the capacity of local roads and infrastructure to accommodate construction vehicles with consideration of construction traffic volumes, vehicle types, route suitability, and network performance. The assessment concludes that with appropriate mitigation in place, there would be no significant adverse impacts on the local highway network during the construction, operation and maintenance, and decommissioning phases of the Scheme. This has been completed by competent experts, as detailed in **ES Volume 3, Appendix 1-1: Statement of Competence [APP-180] and** is considered to be a robust assessment of the Scheme.

SLD-048	Transport and Access	Transport and Access Routes	2.4.2 The Scheme is reliant on only three primary routes for all traffic during construction and maintenance of the proposal; there is no allowance for any "*alternative*" access should one or more of these routes be compromised, as there are no other possible access routes to the site of the development.	The construction routes proposed for the Scheme are presented in **ES Figure 13-1 and Figure 13-2 [APP-146, APP-147]**. These provide access to the Solar PV Sites and the Cable Route Corridor via Junction 17 (Lime Down D and E) and Junction 18 (Lime Down A, B and C) of the M4. An **oCTMP [APP-287]** supports the DCO Application and presents outline measures which restrict construction deliveries to the proposed construction routes. In the unlikely event that construction routes to certain areas of the Solar PV Sites and Cable Route Corridor are closed, construction deliveries will be paused until these reopen. A final CTMP would be prepared post consent and must be substantially in accordance with the **oCTMP [APP-287]** and approved by the relevant local planning authorities (in consultation with the relevant highway authorities), as secured by Requirement 15 in Schedule 2 of the **Draft DCO [APP-016]**.
SLD-049	Transport and Access	Policy Requirements	2.4.3 SLD recognises the relevant policy in para. 5.14.21 of NPS EN-1, which directs that highways grounds for refusing development will arise where there is an *"unacceptable impact on highway safety"* or where *"residual cumulative impacts on the road network would be severe"*. SLD's expert considers that, given the nature of the local roads and their use by vulnerable highway users, that the test is met in the context of the information that is currently available.	The Applicant has undertaken an assessment of potential transport and access impacts of the Scheme in **ES Volume 1, Chapter 13: Transport and Access [APP-065]**. This included the capacity of local roads and infrastructure to accommodate construction vehicles with consideration of construction traffic volumes, vehicle types, route suitability, and network performance. The assessment concludes that with appropriate mitigation in place, there would be no significant adverse impacts on the local highway network during the

				construction, operation and maintenance, and decommissioning phases of the Scheme. This includes cumulative transport and access impacts as a result of the Scheme and nearby developments. The proposed construction routes have been carefully assessed and are considered to be the most appropriate routes to the Scheme. Construction traffic would also be temporary and controlled through measures in a CTMP. An **oCTMP [APP-287]** supports the DCO Application and includes outline measures to minimise transport and access impacts as far as practicable. This includes road condition surveys to ensure any damage to the highway network caused by construction traffic is identified and rectified, management of construction deliveries to avoid the requirement for HGVs generated by the Scheme passing each other in opposite directions on the local roads, and restricted hours of deliveries outside of peak hours. With this mitigation in place, **ES Volume 1, Chapter 13-1: Transport and Access [APP-065]** concludes that impacts would be negligible to minor adverse. A final CTMP would be prepared post consent and must be substantially in accordance with the **oCTMP [APP-287]** and approved by the relevant local planning authorities (in consultation with the relevant highway authorities), as secured by Requirement 15 in Schedule 2 of the **Draft DCO [APP-016]**.

SLD-050	Transport and Access	Impact to Highway Users	2.4.4.1 Failure to survey vulnerable highway users: The impact of the proposed development on vulnerable highway users (pedestrians, cyclists, and equestrians) has not been properly assessed, since no surveys have been carried out of the local lanes and public right of way ("PRoW") networks which are used by residents and others for recreational purposes, to access facilities or to reach PRoWs, and the country lanes used by cyclists and equestrians (among other issues).	The potential impact of the Scheme on non-motorised users (NMU) is assessed in **ES Volume 1, Chapter 13: Transport and Access [APP-065]** which concludes that there would be no significant impact on NMU as a result of the Scheme. Highway widths of construction routes have been assessed and provide sufficient width for HGV traffic to comfortably pass cyclists and equestrians and, as there is a lack of pedestrian infrastructure (such as pavements) along construction routes, these are considered to be unattractive as walking routes so an increase in HGV construction traffic would not result in a significant adverse impact. An **oCTMP [APP-287]** and **oPRoWPPMP [APP-282]** support the DCO Application and include outline measures to ensure impacts to NMU along highways and PRoW are minimised as far as practicable. A final CTMP and PRoWPPMP would be prepared post consent and must be substantially in accordance with the **oCTMP [APP-287]** and **oPRoWPPMP [APP-282]**, respectively, and approved by the relevant local planning authorities (in consultation with the relevant highway authorities), as secured by Requirement 15 and Requirement 16 in Schedule 2 of the **Draft DCO [APP-016]**. On the 12th March 2025 it was agreed in a scoping meeting with WCC that PRoW surveys were not required for the purposes of the transport assessment due to likely low numbers of PRoW users and the adequacy of the proposed mitigation measures during the construction period.

SLD-051	Transport and Access	Cyclists	2.4.4.2 Unacceptable impacts on cyclists: Construction traffic would have a particularly detrimental impact on cyclists using the sections of the Wiltshire Cycleway (Fosse Way and road between Grittleton and Yatton Keynell), accessing parts of the National Landscape and the existing surrounding quiet lanes.	The Applicant has assessed the likely effects on The Wiltshire Way in **ES Volume 3 Appendix 16-2 Tourism and Recreation Receptor Tables [APP-241]**. This assessment considers transport matters (safety and delay) but also user experience, amenity and desirability. As a result of the Scheme, and the implementation of mitigation measures to protect cyclists on this route, the Scheme is anticipated to generate a moderate adverse effect to users of the Wiltshire Way during construction and decommissioning. This is a significant effect, largely as a result of the Wiltshire Way's regional significance as a recreational route. The Scheme is however not anticipated to generate any long-term significant adverse effect on users of The Wiltshire Way during the Scheme's operational phase. The potential impact of the Scheme on non-motorised users (NMU) is assessed in **ES Volume 1, Chapter 13: Transport and Access [APP-065]** which concludes that there would be no significant impact on NMU as a result of the Scheme. Highway widths of construction routes have been assessed and provide sufficient width for HGV traffic to comfortably pass cyclists. An **outline Construction Traffic Management Plan (oCTMP) [APP-287]** and **oPRoWPPMP [APP-282]** support the DCO Application and includes outline measures to ensure impacts to NMU along highways and PRoW are minimised as far as practicable. A final CTMP and PRoWPPMP would be prepared post consent and must be

				substantially in accordance with the **oCTMP [APP-287]** and **oPRoWPPMP [APP-282]**, respectively, and approved by the relevant local planning authorities (in consultation with the relevant highway authorities), as secured by Requirement 15 and Requirement 16 in Schedule 2 of the **Draft DCO [APP-016]**.
SLD-052	Transport and Access	Traffic Assessment	2.4.4.3 Failure to properly assess impact on country lanes: No assessment has been undertaken of the ability of the proposed construction routes to allow large vehicles to pass other large vehicles such as other construction vehicles, other large agricultural, delivery or public service vehicles.	The assessment presented in Annex H of **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]** demonstrates adequate carriageway width or frequency of passing place opportunity to pass at least an HGV and a light vehicle. This confirms that no passing bay or widening improvements are needed to accommodate these movements along construction routes outside of the Order Limits. The distances between passing points outside of the Order Limits are all within 150 m with forward visibility extending to the next passing point and beyond. This is within the generally accepted distance of 200 m.

				To provide further comfort, additional information will be added to **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]** and submitted at Deadline 1 of Examination to demonstrate that there is adequate carriageway width and/or passing place opportunity for two HGVs when accessing Lime Down. An **oCTMP [APP-287]** supports the DCO Application and includes outline measures to minimise transport and access impacts as far as practicable. This includes road condition surveys to ensure any damage to the highway network caused by construction traffic is identified and rectified, management of construction deliveries to avoid the requirement for HGVs generated by the Scheme passing each other in opposite directions on the local roads, and restricted hours of deliveries outside of peak hours. Details of Highway Improvement Areas (HIA) are also provided in the **oCTMP [APP-287]** which have been identified as part of the Scheme to provide temporary mitigation to allow for AIL movements, such as carriageway widening, removal of street furniture, and vegetation clearance. With this mitigation in place, **ES Volume 1, Chapter 13-1: Transport and Access [APP-065]** concludes that impacts would be negligible to minor adverse. A final CTMP would be prepared post consent and must be substantially in accordance with the **oCTMP [APP-287]** and approved by the relevant local planning authorities (in consultation with the relevant highway authorities), as secured by Requirement 15 in Schedule 2 of the **Draft DCO [APP-016]**.

SLD-053	Transport and Access	Lack of Information Regarding Highway Improvement Areas	2.4.4.4 Lack of information regarding highway improvement areas: The supporting transport information fails to provide details of mitigation along narrow country lanes at proposed access points and at other junctions used by construction vehicles where safe visibility cannot be achieved. It appears that widening of highways or the provision of passing places would be required in many areas not currently identified as highway improvement areas. The transport supporting information is particularly deficient in this respect.	Details of Highway Improvement Areas (HIA) are provided in the **outline CTMP [APP-287]** and will include temporary mitigation to allow for AIL movements, such as carriageway widening, removal of street furniture, and vegetation clearance. As detailed in the response above, the assessment presented in Annex H of **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]** demonstrates adequate carriageway width or frequency of passing place opportunity to pass at least an HGV and a light vehicle and, therefore, no mitigation is considered to be required. To provide further comfort, additional information will be added to **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]** and submitted at Deadline 1 of Examination to demonstrate that there is adequate carriageway width and/or passing place opportunity for two HGVs when accessing Lime Down Site D.
SLD-054	Transport and Access	Impact on Trees, Hedgerows and Roadside Walls	2.4.4.5 Impact on trees, hedgerows and roadside walls: Construction access would require the removal of roadside vegetation and walls to accommodate new accesses, to provide safe visibility splays, to accommodate road widening and passing places and to accommodate the swept paths of abnormal indivisible load (“AIL”) vehicles. Further removal of hedgerows and vegetation would be associated with the provision of internal access routes. No assessment has been undertaken of the landscape and ecological impacts of construction access.	**ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]** contains an assessment of impacts from the Scheme on ecological features, including consideration of impacts relating to removal of sections of hedgerows to provide permanent or temporary access. The assessment contained within the chapter concludes there would be no unacceptable significant residual effects as a result of this impact. Vegetation loss associated with the AIL has been assessed in the LVIA in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060] and Appendix Volume 3, Appendix 8-3-5: Assessment Sheet of Abnormal Indivisible Loads [APP-**

				194]. No significant landscape and visual effects were identified. Vegetation loss associated with the internal access routes have been designed to minimise the loss of vegetation by utilising existing access points, widening existing access points and as a last resort providing new access points. Any impacts on hedgerow losses are recorded in the **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]** and **Volume 3, Appendix 10-1 Arboricultural Impact Assessment and Outline Arboricultural Method Statement [APP-206].**
SLD-055	Transport and Access	Traffic Flows	2.4.4.6 Under-estimations of construction HGV trip generation: An initial review of HGV trip generation of the construction of solar array areas suggests that the number of HGVs could be significantly higher than suggested by the Applicant. It appears that the Applicant has failed to allow for the transport associated with key elements of construction such as the solar panel footings, the removal of topsoil, the import of acoustic fencing, and the construction of drainage infrastructure.	The Applicant has predicted construction traffic flows for the Scheme based on a realistic breakdown of construction materials, such as aggregate and access tracks , number of modules including footings, and fencing, Calculations are provided in Annex E of **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]**. Further detail of trip generation will also be added to **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]** and resubmitted at Deadline 1 of Examination. Topsioil will remain on site and will be used as needed such as for any landscaping. The Applicant notes that SLD's independent analysis of construction HGV trip generation has not been provided so is unable to comment on this at this stage.

SLD-056	Transport and Access	National Landscape	2.4.4.7 Under-estimations of impact on National Landscape: The impact of construction traffic on the National Landscape, based on the Applicant's own figures, has been downplayed and, as a consequence, no mitigation is proposed. This finding is not consistent with the National Landscape Board's view that no construction traffic should be routed through the National Landscape due to the likely significant adverse impacts on tranquillity and landscape and scenic beauty. The magnitude of impact is increased if the HGV trip generation is higher than stated by the Applicant (see above).	**ES Volume 1, Chapter 13: Transport and Access [APP-065]** identifies that the road links within the CNL have a medium sensitivity to transport and access impacts. In line with paragraph 1.31 of the IEMA guidelines the sensitivity of the CNL in transport terms i.e. the sensitive receptors within the agreed study area should be assigned to the nearest highway link, and the relationship with the highway environment examined to understand the sensitivity of those receptors to change. Following this exercise, each highway link within the agreed study area can be assigned a sensitivity value. In this case, for highway assessment purposes, each highway link in the CNL was assigned a sensitivity value of medium. This sensitivity was determined in agreement with Wiltshire Council. The proposed construction routes have been carefully assessed and are considered to be the most appropriate routes to the Scheme. Construction traffic would also be temporary and controlled through measures in a CTMP to minimise adverse impacts on the highway network, including within the CNL. An **oCTMP [APP-287]** supports the DCO Application and includes outline measures to minimise transport and access impacts as far as practicable. This includes road condition surveys to ensure any damage to the highway network caused by construction traffic is identified and rectified, management of construction deliveries to avoid the requirement for HGVs generated by the Scheme passing each other in opposite directions on the

				local roads, and restricted hours of deliveries outside of peak hours. With this mitigation in place, **ES Volume 1, Chapter 13-1: Transport and Access [APP-065]** concludes that impacts would be negligible to minor adverse. A final CTMP would be prepared post consent and must be substantially in accordance with the **oCTMP [APP-287]** and approved by the relevant local planning authorities (in consultation with the relevant highway authorities), as secured by Requirement 15 in Schedule 2 of the **Draft DCO [APP-016]**. The effects on the Cotswolds National Landscape and its Special Qualities including Tranquillity are set out in a standalone assessment in **ES Volume 3, Appendix 8-6 [APP-197].**
SLD-057	Transport and Access	Cumulative Impacts	2.4.4.8 Cumulative impact of cable route construction: The Applicant fails to assess the cumulative impact of solar array and cable route construction activities despite the cable route generating around an additional 77% (Applicant's figures) of the HGVs generated by the solar array areas.	The majority of routes for the construction of the Cable Route Corridor use different parts of the highway network from those for the construction route for the Solar PV Sites. The Solar PV Sites are located north of the M4, whereas the majority of the Cable Route Corridor is located to the south of the M4. In addition, it is also anticipated that the Cable Route Corridor will be constructed into four 5.5 km sections with the accesses to these required for temporary use for approximately 90 days. At any one time there will only be one access in operation in each section, resulting in a non-material impact. The trips generated by the Cable Route Corridor are set out in **ES Volume 1, Chapter 13-1: Transport and Access [APP-065]** and demonstrates each access would only

				generate four HGV deliveries per day for the 90-day construction period. Therefore, there is expected to be limited cumulative transport and access impacts as a result of the construction of the Solar PV Sites and Cable Route Corridor.
SLD-058	Transport and Access	Traffic Impacts	2.4.4.9 Unacceptable adverse transport environmental impacts on residents: The construction phase would have a particularly significant impact on a number of settlements, including Hullavington, Norton, Acton Turville, Burton, Grittleton, Sherston, Malmesbury, Stanton St Quinton, Corston, and Gastard.	**ES Volume 1, Chapter 13: Transport and Access [APP-065]** provides an assessment of the construction impact on highway network and its users. This concludes that there would be negligible to minor adverse effects to the highway network which are non-significant. In relation to the specific settlements named : • Hullavington – construction routes don't go through the village; • Norton – not on construction route; • Acton Turville - construction route is on B-Road; • Burton – construction route is on B-Road;

				• Grittleton – construction route doesn't go through the centre of the village; • Sherston - not on construction route, • Malmesbury - AIL route only, and A road so low flows and minimal impact • Stanton St Quinton – construction route on A road passed Lower Stanton St Quinton, no routes proposed via Stanton St Quinton. • Corston - just an AIL route only and on an A road doesn't route through the village; • Gastard - cable route only so low numbers of trips and temporary.
SLD-059	Transport and Access	Traffic Impacts	2.4.5 The aforementioned points focus on the construction phase of the development. Generally, SLD considers that the information submitted in support of the Application does not provide any confidence that the proposal would not have a significant adverse impact on the local highway network, nor that there would not be an unacceptable risk to highway safety.	The Applicant has undertaken an assessment of potential transport and access impacts of the Scheme in **ES Volume 1, Chapter 13: Transport and Access [APP-065]**. This included the capacity of local roads and infrastructure to accommodate construction vehicles with consideration of construction traffic volumes, vehicle types, route suitability, and network performance. The assessment concludes that with appropriate mitigation in place, there would be no significant adverse impacts on the local highway network, including highway safety, during the construction, operation and maintenance, and decommissioning phases of the Scheme. This has been completed by competent experts, as detailed in **ES Volume 3, Appendix 1-1: Statement of Competence [APP-180] and** is

				considered to be a robust assessment of the Scheme.
SLD-060	Ecology and Biodiversity	Summary	2.5.1 The Scheme is proposed in an area with various important ecological features. Within the Scheme boundary are a number of local designated sites, priority habitats and ancient woodlands. Close to the sites' boundaries are a number of nationally- and internationally-protected sites which are threatened by the Scheme. As a result, SLD has instructed expert ecologists to assess the Application, and a detailed report will be submitted at the WR stage. Noting the strong policy protections for key flora and fauna in the NPSs and NPPF, SLD considers the ecological assessment and mitigations are woefully inadequate.	The Applicant notes these comments and will await SLD's Written Representations. Potential impacts of the Scheme on ecology and biodiversity, including designated sites and priority habitats are assessed in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**, which considers baseline conditions and evaluates likely effects during construction, operation and decommissioning. The assessment identifies embedded and additional mitigation measures and concludes that, with these measures in place, no unacceptable significant adverse effects on ecology and biodiversity are anticipated.
SLD-061	Ecology and Biodiversity	Impacts on Ecology and Biodiversity	2.5.2 SLD's ecologist has identified the following issues in respect of ecology and biodiversity: • Inadequacy of assessments; • Adverse effects on protected species and locally-present species; • Adverse effects on statutorily- and locally-designated sites, including those subject to European site designations; • Adverse effects on woodland, trees and hedgerows;	The Applicant notes these comments and will await SLD's expert submission on the topics listed. Potential impacts of the Scheme on ecology and biodiversity are assessed in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**, which considers baseline conditions and evaluates likely effects during construction, operation and decommissioning. The assessment identifies embedded and additional mitigation measures and concludes that,

			• Poorly-designed environmental and biodiversity enhancements; and • The ineffectiveness of proposed mitigation measures.	with these measures in place, no unacceptable significant adverse effects on ecology and biodiversity are anticipated. The Chapter provides a balanced assessment of likely significant effects, identifying residual effects where these remain after mitigation. Unavoidable losses of priority habitats, including hedgerows, have been minimised through careful design and are subsequently addressed through mitigation, compensation and long-term management to be secured via DCO Requirements including the **Outline Landscape and Ecological Management Plan (oLEMP) [APP-283]** and the **Outline Ecological Protection and Mitigation Strategy (oEPMS) [APP-284]**. It is the Applicant's view that mitigation measures proposed are effective, follow best-practice guidance and have been adopted as part of other approved schemes of a similar scale and nature.
SLD-062	Ecology and Biodiversity	Ecological Baseline	2.5.3 The Applicant's assessment of the ecological baseline indicates that the Scheme is located in an area which is ecologically rich and adjacent to a variety of ecological features of national and international importance. It is noted that: 2.5.3.1 The Solar PV Sites are located within 30 km of at least five internationally-designated sites: the Bath and Bradford-on-Avon Bats Special Area of Conservation ("SAC"), Severn Estuary SAC, Severn Estuary Special Protection Area ("SPA"), Severn Estuary Ramsar Site, and the Salisbury Plain SPA.	The Applicant notes these comments. Potential impacts of the Scheme on ecology and biodiversity, including designated sites and priority habitats are assessed in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**, which considers baseline conditions and evaluates likely effects during construction, operation and decommissioning. The assessment identifies embedded and additional mitigation measures and concludes that, with these measures in place, no unacceptable significant adverse effects

			2.5.3.2 There are at least four nationally-designated sites identified within 5 kilometres of the Sites, including the Harries Ground Rodbourne SSSI, Corston Quarry and Pond LNR, Sutton Lane Meadows SSSI, and Conygre Mead LNR. 2.5.3.3 There are a variety of non-statutory designated sites immediately adjacent to the Solar PV Sites, or within 2 km, which are of significant County importance. 2.5.3.4 The Solar PV Sites are located immediately adjacent to or within 2km of a variety of Priority Habitats and Ancient Woodland.	on these designated sites and priority habitats will occur.
SLD-063	Ecology and Biodiversity	Ecology Assessmets	2.5.4 Taking into account the broad ecological features of the local landscape, general layout of the proposal, and the nature of the works, major ecological impacts on habitats and species are likely, both in the long-term and the short-term. However, the Applicant's assessment of potential harm to protected species, ecology, and sites of biodiversity value, is inadequate. Generally, impacts have been under-estimated, and the effectiveness of avoidance and mitigation strategies over-estimated.	The Applicant acknowledges that some adverse ecological effects are unavoidable. These are transparently reported within **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]** and are summarised within the residual effects summary tables (Table 9-14 and 9-15). The Chapter provides a balanced assessment of likely significant effects, identifying residual effects where these remain after mitigation. Unavoidable losses of priority habitats, including hedgerows, have been minimised through careful design and are subsequently addressed through mitigation, compensation and long-term management to be secured via DCO Requirements including the **Outline Landscape and Ecological Management Plan (Outline LEMP) [APP.283]** and the **Outline Ecological Protection and Mitigation Strategy (Outline EPMS) [APP-284].** It is the

				Applicant's view that avoidance and mitigation measures proposed are effective, follow best-practice guidance and have been adopted as part of other approved schemes of a similar scale and nature.
SLD-064	Ecology and Biodiversity	Baseline Survey Data	2.5.4.1 The Applicant has failed to provide baseline survey data for brown hare, hedgehog, polecat, dormice, harvest mice, reptiles, invertebrates, otters, water voles, and white-clawed crayfish. In the context of a development of this scale that affects and crosses such a wide section of the local landscape, it is not possible for planning to make an adequately-informed and secure decision purely based on broad habitat types without actual species-specific survey data.	The Applicant does not agree that the survey approach results in an under-estimation of effects. The scope of ecological and species-specific survey were defined using a proportionate, risk-based approach. Survey scope and effort across the Order Limits were targeted to areas and species where there was a reasonable likelihood of significant effects, rather than applied uniformly across the Order Limits irrespective of risk. Based on this approach, and where no species-specific surveys have been conducted, the assessment of effects set out within **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]** has been based on a comprehensive appraisal of habitat suitability for species informed by baseline habitat data collected through surveys, and species have been assumed to be present in all suitable habitat. The baseline information is considered sufficient to support a robust and proportionate assessment of likely significant effects of the Scheme, and the conclusions of **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]** are appropriate and justified.

SLD-065	Ecology and Biodiversity	Mitigation	2.5.4.2 The Applicant's proposed mitigation is to assume that, when in doubt, species are present, and to carry out pre-clearance searches and halt works where animals are discovered until they have been successfully translocated. This function is supposed to be discharged by an Ecological Clerk of Works who would not in fact be on site most of the time ([APP-284] para 1.4.2) and would have to possess a very wide range of expertise. This does not appear to be a credible strategy. In practice it is often not feasible to effectively detect and thus avoid/mitigate ecological impacts ad-hoc without a baseline to inform decisions and monitor against in the long term. Additionally, pre-clearance searches should not and cannot safely be the only measure in place to detect, avoid, and mitigate impacts to species for such a large-scale development.	Embedded mitigation and further controls secured through the **Outline EPMS [APP-284],** including pre-construction surveys and inspections, micro-siting of cabling works, appointment of an Ecological Clerk of Works (EcoCoW) and species-specific protection measures, where appropriate, provide a recognised mechanism for managing ecological risks and impacts during construction work.

SLD-066	Ecology and Biodiversity	Cable Route Corridor	2.5.4.3 The cable route is even more poorly surveyed, with 17 ha completely un-surveyed due to access issues, no breeding bird or wintering bird surveys, no bat surveys in spite of the proximity of bat SACs, and so on. This reliance on guesswork makes it impossible to know whether protected species are being impacted, or what the impacts on non-protected species would be. The attempt to transpose surveys from the solar panel fields is inappropriate and will not accurately reflect the actual degree of impacts of such large-scale cable-laying.	The Applicant acknowledges that some areas within the Cable Route Corridor had not been subject to ecological survey at the point of finalising **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061].** Since the preparation of the Chapter, habitat surveys have now been completed across all previously un-surveyed areas. The survey methodology applied was consistent with that reported in the **ES Volume 3, Appendix 9-3: Ecological Baseline Report [APP-198]** for the rest of the Cable Route Corridor. The results of these surveys have been reviewed and, in the Applicant's view, do not alter the conclusions of **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]** regarding likely significant effects. The precautionary assumptions previously applied in the ES were conservative and appropriately accounted for any uncertainty associated with un-surveyed areas. The Applicant has updated **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]** and provided a revised version at Deadline 1 with the findings of these surveys, and it is considered these do not materially change the assessment of likely significant effects presented in the chapter.

SLD-067	Ecology and Biodiversity	Skylark and Yellow Wagtail Impact	2.5.4.4 The ES admits that about 71% of the skylark and yellow wagtail nesting habitat would be destroyed in the panel areas. Even this figure assumes that some of the destruction can be mitigated by creation of optimal foraging habitat under the panels for skylarks nesting elsewhere. This relies on highly optimistic assumptions about the possibility of species-rich grassland being created on former arable land. Such optimistic assumptions and plans which lack ecological credibility pervade the whole document and will be detailed in the SLD WRs.	The assessment in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]** identifies skylarks and yellow wagtails as a key species of conservation interest within the Scheme area. It concludes that a proportion of the current skylark and yellow wagtail population will be displaced from the Solar PV Sites, which will give rise to an adverse residual effect at a Local and Site level respectively. Skylark-specific mitigation and habitat enhancement measures are incorporated into the Scheme design to reduce effects as far as practicable. These include the provision of suitably large, open set-aside and grassland habitats designed to provide appropriate breeding and foraging conditions. These measures are illustrated in **ES Volume 2, Figure 3-4: Landscape and Ecological Mitigation Plan [APP-084]** and detailed in the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283].** Skylarks have been observed gathering food from within operational solar farms and leading young into them, indicating they are valuable foraging resources. Whilst it is assumed that skylarks will typically avoid nesting in solar farms, skylark foraging habitat requirements are less strict.

SLD-068	Ecology and Biodiversity	Aquatic Environment	2.5.4.5 The aquatic environment is almost completely neglected, in spite of some of the rivers being designated priority habitats. There is no consideration of the quantity and quality of the groundwater, and its effects on rivers and ponds; the considerable potential for diffuse pollution from silt, soil or chemicals, for altered hydrology due to soil compaction during construction leading to changes in flow regimes; and for adverse impacts on water resources in an already over-abstracted catchment.	The Applicant does not agree that the aquatic environment has been neglected. The assessment in **Chapter 11 Hydrology, Flood Risk and Drainage [APP-063]** considers surface water receptors, fluvial systems and their hydrological connectivity, including designated and priority habitats where relevant. The assessment addresses both water quantity and water quality pathways and concludes that, with embedded mitigation, there would be no significant adverse effects on rivers, ponds or associated habitats. Groundwater quantity and quality have been assessed within **Chapter 19 Ground Conditions [APP-071]**, including consideration of aquifers and Source Protection Zones, and potential pollutant linkages. The interaction between groundwater and surface water bodies is addressed through the conceptual site model and embedded mitigation. Construction phase risks, including diffuse pollution from silt, soils and chemicals, are assessed in Chapter 11 and controlled through the o**utline Construction Environmental Management Plan (oCEMP) [APP-277]**, which secures standard pollution prevention measures, temporary drainage controls, sediment management and reinstatement to avoid altered flow regimes arising from compaction. These measures are secured through the **Draft Development Consent Order [APP-016].** The Scheme does not involve operational water abstraction and therefore does not give rise to adverse effects on catchment

				water resources. On this basis, the Applicant considers that both groundwater and surface water environments have been appropriately assessed and that suitable mitigation and controls are secured.
SLD-069	Ecology and Biodiversity	Biodiversity Net Gain	2.5.4.6 A number of significant local opportunities to provide biodiversity net gain and benefits to local communities have been missed (such as restoration of the old meandering course of the Gauze Brook and its floodplain as a cost-effective nature-based solution to flood risk in Corston; the creation of species-rich grassland adjacent and connecting to Harries Ground SSSI near Rodbourne; and the pro-active control of invasive non-native species).	The Applicant notes these comments. A comprehensive package of habitat creation and enhancement measures are shown in **ES Volume 2, Figure 3-4: Landscape and Ecological Mitigation Plan [APP-084]** and detailed in the o**utline Landscape and Ecological Management Plan (Outline LEMP) [APP-283].** These include the enhancement of riparian buffer zones alongside the Gauze Brook to increase the ecological value of this important watercourse and associated species. As described in paragraphs 9.10.58 to 9.10.65 of **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**. a buffer zone of at least 15 m will be maintained between the Harries Ground, Rodbourne SSSI boundary and any development. This is greater than the existing field margin which lies between the cultivated arable habitat and the SSSI boundary, which is approximately 5 m wide. The establishment of diverse grassland habitat within this buffer zone, as well as the general reversion of the arable fields which dominate the Solar PV Sites to grassland (for the lifetime of the

				Scheme) is considered likely to result in a significant beneficial effect in the extent and quality of grassland habitats within the Solar PV Sites which may provide supporting habitat for species associated with the SSSI, and thus strengthen the ecological integrity of the designated site.
SLD-070	Ecology and Biodiversity	Mitigation	2.5.4.7 The ES fails to propose or sufficiently detail any mitigation measures in relation to potential commute route disruption and the exclusion of fauna from the solar panel fields due to newly-installed boundary fencing. The ES does not properly address the impact of such route disruption on various species, including otter, hare, and hedgehog. This includes a lack of detail about the wire mesh to be used.	The Scheme design incorporates fencing around the Solar PV Arrays that is permeable to wildlife, with the exception of deer. This means otters, hares and hedgehogs and all other wildlife (excluding deer only) will be able to freely access habitats within the Solar PV Sites without the need for wildlife gates. In addition, wide buffers are retained around the peripheries of the Solar PV Sites to allow wildlife, including deer, to move between favoured habitats. These measures are described in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]** and detailed in the **Outline Ecological Protection and Mitigation Strategy (OEPMS) [APP-284].**

SLD-071	Ecology and Biodiversity	Cable Route Corridor	2.5.4.8 The information presented in respect of cable-laying indicates that, at a minimum, there would be both temporary and permanent loss of habitat and features directly above trench lines. This carries a significant potential for impacts to woodland, hedgerow and other high-quality off-site habitats within the landscape. Even where temporary, large-scale trenching such as this carries an inherently high potential risk of affecting protected fauna, irreplaceable habitats, and features, above and below ground. 2.5.4.9 While precautions have been specifically included to avoid impacts from cable-laying on sensitive habitats, ecological data along the Cable Corridor for several protected species are lacking, even when these impacts have been flagged and appropriately mitigated within the solar panel fields. This raises concerns regarding whether impacts could be realistically detected in time to actually make alterations to the cable route and avoid/mitigate them. At present, there is a significant risk that impacts from this phase of the works are being overlooked due to the temporary nature of the trenches.	The scope of ecological and species-specific survey within the CRC was defined using a proportionate, risk-based approach. Survey scope and effort across the Order Limits were targeted to areas and features where there was a reasonable likelihood of significant effects, rather than applied uniformly across the Order Limits irrespective of risk. The assessment has had regard to the short-term, temporary and construction-phase nature of works within the CRC, the absence of permanent operational effects, and a robust appraisal of habitat suitability for species based on baseline habitats data collected through surveys. Based on this, a reduced survey effort within the Cable Route Corridor has been undertaken compared to the Solar PV Sites. Potential impacts within the CRC, including temporary habitat loss, disturbance and fragmentation, have been assessed on a precautionary reasonable worst-case basis. This assumes that works within the CRC will be progressive over the approximate 18-month period. Embedded mitigation and further controls secured through the **Outline EPMS [APP-284]**, including pre-construction surveys and inspections, micro-siting of cabling works, appointment of an Ecological Clerk of Works and species-specific protection measures, where appropriate, provide a recognised mechanism for managing residual ecological risk. Furthermore, reinstatement of any disturbed habitats

				will take place as a priority following construction within the CRC.

SLD-072	Ecology and Biodiversity	Ancient Woodlands	2.5.4.10 The ancient woodland at North Bincombe Wood near Rodbourne is likely to be impacted by the construction of an access track within the 15m Ancient Woodland Buffer zone over a considerable distance. A temporary construction compound is to be built adjacent to Surrendell Wood, an ancient woodland near Hullavington. No details of the arrangement of facilities within these compounds are available but both these developments pose a threat to these irreplaceable habitats.	The potential effects of the Scheme on North Bincombe Wood, including the section of access track within the 15 m Ancient Woodland buffer, have been assessed in **ES Volume 3, Appendix 10-1: Arboricultural Impact Assessment and Outline Arboricultural Method Statement [APP-206]**. As set out in paragraph 4.1.10 of Appendix 10-1, the assessment concludes that effects on North Bincombe Wood would be negligible. In relation to the temporary construction compound located adjacent to Surrendell Wood, the **Outline Construction Environmental Management Plan (Outline CEMP) [APP-277]** requires temporary construction compounds to be located outside the canopy spread and Root Protection Areas (RPAs) of adjacent trees and woodland.
SLD-073	Ecology and Biodiversity	Biodiversity Net Gain	2.5.5 There are a variety of errors in the Applicant's BNG calculation. The BNG calculations were not submitted in the correct format (i.e. an unlocked Excel file) making them impossible to check in detail. For example, the BNG calculation submitted notes that the trading rules for BNG have not been satisfied. The trading rules set minimum habitat creation and enhancement requirements to compensate for specific habitat losses. As a consequence, the Applicant may have overstated biodiversity gain. Also, a habitat created as compensatory mitigation for a destroyed habitat elsewhere cannot be counted as part of	The Applicant notes this comment and a copy of the **Statutory Biodiversity Metric [APP-274]** in excel form has been submitted at Deadline 1. A full justification for the single habitat trading rule not being met is provided in paragraphs 1.11.10 - 1.11.16 of the **Biodiversity Net Gain Assessment Report [APP-273]**. This relates to the loss of habitats within the 'Cropland' broad habitat type, and is considered an artefact of the Statutory Metric, given that these habitats will in reality be retained and enhanced through the Scheme. Therefore, taking into account professional judgement, the BNG

			the BNG. This double counting exists throughout the ES.	assessment is considered to be fully compliant with all trading rules. The Applicant confirms that habitat created as part of compensation or mitigation measures can indeed contribute to BNG values and this is accordance with guidance provide by DEFRA on this matter (for instance DEFRA article 'What you can count towards a development's biodiversity net gain' (May 2023) found at https://www.gov.uk/guidance/what-you-can-count-towards-a-developments-biodiversity-net-gain-bng)
SLD-074	Ecology and Biodiversity	Ecological Assessments	2.5.6 Overall, the Applicant lacks material evidence for their assertions because of insufficient survey work and insecure extrapolation into un-surveyed areas. Effects on sites with statutory and non-statutory protection are inadequately assessed. The Landscape and Ecological Management Plan [APP-283] while only an outline lacks ecological credibility, including in its plans for mitigation.	The scope of ecological and species-specific survey underpinning the ecological assessment was defined using a proportionate, risk-based approach. Survey scope and effort across the Order Limits were targeted to areas and features where there was a reasonable likelihood of significant effects, rather than applied uniformly across the Order Limits irrespective of risk. The Applicant does not agree that the survey approach results in an under-estimation of effects. The baseline information is considered sufficient to support a robust and proportionate assessment of likely significant effects, and the conclusions of **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]** remain appropriate and justified in the Applicant's view. The habitat creation, enhancement, management and monitoring strategies described in the **Outline Landscape and Ecological Management Plan (Outline**

				LEMP) [APP-283] follow best available good-practice guidance and have been adopted as part of other approved schemes of a similar scale and nature.
SLD-075	Hydrology, Flood Risk and Drainage	Flooding	2.6.1 Flood is a serious issue in the area around the Scheme, and is a matter of great concern to local people. Surface water flooding on local roads, sufficient to cause diversions, occurs every year. Fluvial flooding from the River Avon affects Malmesbury regularly, and a local flood relief scheme is being designed. The Gauze Brook is a tributary of the Avon which often floods Corston and the surrounding area. Large storms, such as Storm Bert in November 2024 and Storm Claudia in November 2025, not only flood the local area but the towns downstream. Storm Bert flooded the centre of Chippenham and substantial parts of Melksham and Bradford-on-Avon, and Storm Claudia flooded Malmesbury for a	The Applicant acknowledges that parts of the area are subject to existing flood risk issues, including surface water flooding affecting roads and fluvial flooding associated with the River Avon and its tributaries, including the Gauze Brook. These existing conditions are reflected in the assessment presented in **Environmental Statement Chapter 11 Hydrology, Flood Risk and Drainage [APP-063]**, which considers relevant sources of flooding and downstream receptors. The assessment concludes that, with the embedded mitigation measures secured, the Scheme would not result in a material increase in off-site flood risk, including to adjacent communities and downstream

			second time in a year, putting the financial viability of various sports clubs and other outfits at risk. The Environment Agency recognises that flood risk in Malmesbury and Bradford-on-Avon is hard to mitigate.	receptors, and that any on-site flood risk would be managed such that the Scheme remains safe and operable for its lifetime. The Applicant also recognises that wider catchment flood management measures can, in some circumstances, contribute to downstream flood risk reduction. Without committing to specific interventions at this stage, the Applicant will continue to consider whether there are opportunities within the Order Limits for small-scale natural flood management or similar measures that could provide localised benefits, where these are compatible with the Scheme design and land use. The assessment has been prepared in accordance with national policy and best practice guidance and has been informed by engagement with the Environment Agency and Lead Local Flood Authority. The matters discussed are also reflected in the relevant **Statement of Common Ground**, which will be submitted at Deadline 1. The **Outline Construction Environmental Management Plan (CEMP) [APP-277]** has been developed to control construction-phase risks and ensure there is no material increase in off-site flood risk. In accordance with NPS EN-3 (paragraph 2.10.84), the assessment differentiates between solar PV panel areas, which drain to the existing ground and therefore do not generally give rise to significant drainage effects, and associated infrastructure (for example access tracks, temporary construction compounds, substations and the BESS) where runoff controls are required. Where drainage measures are

				necessary, these include permeable surfacing, infiltration features, swales and attenuation storage to manage surface water and maintain greenfield runoff behaviour, as applicable. Requirement 13 in Schedule 2 to the **Draft DCO [APP-016]** secures that prior to the operation of the Scheme, a CEMP must be submitted to and approved by the relevant planning authority, the CEMP must be substantially in accordance with the Outline CEMP, and all construction works associated must be carried out in accordance with the approved CEMP. **Requirement 13 in Schedule 2 to the Draft DCO [APP-016]** secures that part of the authorised development can commence until, a CEMP is submitted to and approved by the relevant planning authority. The CEMP must be substantially in accordance with the Outline CEMP, and all construction works associated must be carried out in accordance with the approved CEMP.
SLD-076	Hydrology, Flood Risk and Drainage	Flooding - National Policy	2.6.2 NPS EN-1 *"steer[s] new development to areas with the lowest risk of flooding"* (para 5.8.6) and, where such infrastructure is *"exceptionally, necessary in flood risk areas… policy aims to make it safe for its lifetime without increasing flood risk elsewhere and, where possible, by reducing flood risk overall"* (para 5.8.7). The requirement that a development not precipitate *"increasing flood risk elsewhere"* is also part of the Exception Test to the Sequential Test (para 5.8.11).	The Applicant confirms that the Scheme has been assessed and designed in accordance with NPS EN-1, including the application of the Sequential Test and, where relevant, the Exception Test as presented in Annex C of the **Planning Statement [APP-574]**. The Scheme is designed to be safe for its lifetime and not to increase flood risk elsewhere, with embedded and additional mitigation secured through the DCO discharge process.

SLD-077	Hydrology, Flood Risk and Drainage	Flooding	2.6.3 The Applicant asserts that there are *"limited areas"* in Flood Zones 2 and 3 ([APP-054] para 2.4.11. However significant areas in Lime Down D (fields D9-14, D16-17, D19-22, [APP-63] para 11.7.40) and Lime Down E (fields E4, E20-27, [APP-63] para 11.7.49 and 11.7.56) are in Flood Zones 2 and 3. Given this, and the existing problematic flooding situation locally, SLD doubts the correctness of the suggestion that the current flood risk without mitigation is *"negligible to low"* ([APP-210], para 3.1.4). This does not align with the current reality on site. 2.6.4 Indeed, the approach to flooding (particularly off-site which is made worse by the Scheme) is unduly optimistic. To take one example: while the Applicant accepts that PV panels *"have the potential to concentrate rainfall under the leeward edge"* of panels, it asserts *"this increase would not be significant"* ([APP-059], para 11.9.2, bp 20). In doing so, it relies on outdated 2013 research and does not engage in much more recent research which identifies significant increases in peak discharge as a result of PV panels (both generally, but also as a result of soils such as those on the site).	The Applicant acknowledges that parts of Lime Down D and Lime Down E include areas of Flood Zones 2 and 3, as identified on the Environment Agency Flood Map for Planning and recognised in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [APP-063]**, including paragraphs 11.7.40, 11.7.49 and 11.7.56. The presence of Flood Zones 2 and 3 within parts of the Order Limits does not indicate that the assessment understates flood risk or relies solely on Flood Zone classification. The flood risk assessment considers all relevant sources and mechanisms of flooding, including fluvial and surface water flooding and construction phase effects, informed by site specific hydraulic modelling of Gauze Brook, topographic survey data and historic flood information, as set out in **Flood Risk Assessment and Drainage Strategy – Covering Report [APP-210]**. The conclusion that residual flood risk within the Site is negligible to low reflects the assessed flood depths, extents and duration across the Site and the nature and location of the proposed development. Critical infrastructure including the BESS and substations is sequentially located within Flood Zone 1 where practicable. Areas of Flood Zones 2 and 3 within the Order Limits principally comprise panelled areas and undeveloped land where the development does not materially obstruct floodplain storage or conveyance. The assessment therefore concludes that the Scheme would not increase flood risk elsewhere, consistent with national policy

				requirements and as reported in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [APP-063]**. With respect to the potential redistribution of rainfall beneath solar PV panels, the assessment recognises that rainfall may concentrate locally along panel edges but concludes that this does not give rise to significant changes in runoff behaviour or peak flows. Solar PV panels do not form continuous impermeable surfaces and rainfall continues to drain to ground beneath and between panel rows. This approach is consistent with **NPS EN-3 paragraph 3.10.75**, which recognises that solar PV panels generally drain to the ground and that drainage impacts are not, in general, significant where ground cover is maintained. The Applicant does not agree that the assessment relies on outdated research. The evidence base considered includes peer reviewed studies on rainfall redistribution and runoff beneath solar arrays, including Cook and McCuen (2013), together with the wider published literature on solar PV hydrology. These studies consistently demonstrate that where solar PV arrays are installed over maintained vegetated ground cover, they do not function as impermeable surfaces and do not materially increase runoff volumes or peak flows. Localised redistribution of rainfall beneath panel edges can occur, but this effect does not lead to significant changes in catchment response where soils remain vegetated and uncompacted. The Scheme therefore maintains permanent vegetated ground cover beneath and between panel rows

				and includes construction and operational controls to protect soil structure and infiltration capacity. On this basis, the assessment concludes that solar PV panelled areas would not materially increase peak discharge or runoff leaving the Site.

SLD-078	Hydrology, Flood Risk and Drainage	Flooding and Soil Erosion	2.6.5 SLD is not aware of any experience of the use at scale of the large tracking panels in the UK or other wet countries. The larger panel size would mean that the rainfall concentration factor is greater than for conventional panels, making it even less likely that vegetated soils have adequate infiltration capacity to absorb the water. This would increase both peak discharge and the risk of soil erosion. Moreover, the height from which the rainfall runs off the panels, typically 30-40 cm, would be much greater for the tracking panels especially as they are intended to be kept horizontally 2.5 m above the ground surface outside generating hours. The kinetic energy of a water stream falling from 2.5 m is more than six times the same stream falling from 40 cm. This energy would be manifested as increased runoff and soil erosion. SLD will provide more detail in the WRs.	In relation to surface water runoff from solar PV panels, the Applicant does not agree that the Scheme would materially increase runoff or off-site risk. The panels are distributed across the Site with drip gaps and are elevated such that rainfall drains directly to ground beneath and between arrays rather than being conveyed as concentrated flows, as set out in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [APP-063]**, paragraphs 11.8.14 to 11.8.16. This accords with NPS EN-3 paragraph 3.10.75, which recognises that solar PV panels generally drain to ground and do not create significant drainage impacts where ground cover is maintained. The existing baseline comprises intensively managed arable fields subject to trafficking, compaction and periods of bare ground, while the Scheme introduces permanent grass cover and reduced soil disturbance, improving infiltration capacity over the operational lifetime. Published research including Cook and McEwan (2013) supports the conclusion that ground-mounted solar PV does not result in significant increases in runoff volumes or peak discharge where soils are vegetated and appropriately managed. Scheme-specific drainage controls are secured through Requirement 11 of the **Draft Development Consent Order [APP-016]**. No amendments to the application documents are required.

SLD-079	Hydrology, Flood Risk and Drainage	Flooding	2.6.6 Studies on solar panels and hydrology show that panels tend to increase the amount of water in the surrounding environment. The major reason for this is a reduction in evaporation from the ground surface. The amount of evaporation is determined by the energy flux to the ground and the availability of water to evaporate. Since the whole purpose of a solar array is to capture energy and transport it out of the system for use elsewhere, there would be less energy available to evaporate water from the area of the panels, and evaporation would be reduced, leading to increased water availability in the system. While in drier climates this can be used for agrivoltaics, in the UK the additional water is likely to increase flood risk. This would be particularly so at Lime Down where a relatively large proportion of the area of small headwater catchments would be covered by panels. The requirement in NPS EN-1 that there should be no increase in flooding off site would inevitably be breached as the extra water would have to go somewhere, and this matter should be properly addressed.	The Applicant does not agree that reduced evaporation beneath solar PV panels would inevitably lead to increased flood risk or breach the requirement to avoid increased flooding off site. Flood risk is determined by rainfall intensity, infiltration capacity and surface runoff generation during storm events, which occur over short timescales where evaporation rates are not the controlling factor, and any reduction in evaporation between rainfall events does not materially affect the capacity of vegetated soils to infiltrate and attenuate rainfall during subsequent storms. The assessment in **Environmental Statement Chapter 11 Hydrology, Flood Risk and Drainage [APP-063]**, paragraphs 11.8.14 to 11.8.18, considers runoff generation in terms of rainfall, infiltration, soil condition and drainage pathways rather than evaporation in isolation, and concludes that the Scheme would not increase flood risk elsewhere. National policy recognises that ground-mounted solar PV generally drains to ground and does not create significant drainage impacts where ground cover is maintained (NPS EN-3 paragraph 3.10.75). The existing baseline comprises intensively managed arable land subject to trafficking, compaction and periods of bare ground. The Scheme introduces permanent grass cover and substantially reduces trafficking beneath panels, improving infiltration capacity and soil structure relative to the baseline. Any localised changes in soil moisture beneath panels do not translate into increased runoff, peak flows or adverse

				off-site flood risk at a catchment scale. Drainage controls are secured through Requirement 11 of the **Draft Development Consent Order [APP-016]**. No amendments to the application documents are required.

SLD-080	Hydrology, Flood Risk and Drainage	Sustainable Drainage Systems (SuDS)	2.6.7 The developers admit that the increase in hardstanding in the catchment from substations, inverter cabins, the BESS, new surfaced roads, and sundry smaller pieces of infrastructure, would increase runoff rates ([APP-063], para 11.10.33). They propose to mitigate this by standard engineering and Sustainable Drainage System ("SuDS") techniques. Except for around the BESS there is no detail on where the structures concerned would go, and there is limited room in many places. There is no explanation of how the SuDS schemes would be integrated into the site, as required by NPS EN-1 Paragraph 5.8.15, and indeed many of the other requirements of this paragraph have not been followed. The mitigation methods outlined in the outline Construction Environment Management Plan ("CEMP") [APP-277] are largely a list of possible techniques rather than an actual plan. While SLD understand that not all detail can be secured now, the Applicant's position on SuDS is mere speculation rather than even an outline plan.	The Applicant does not agree that the SuDS position is speculative or that detailed design is required at this stage of the DCO process. **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [APP-063]** distinguishes between panelled areas, where runoff continues to drain to ground, and hardstanding associated with supporting electrical infrastructure such as BESS and substations, where engineered drainage is required. The drainage strategies for hardstanding areas presented in **Appendices 11-2 to 11-9 Flood Risk Assessment and Drainage Strategy [APP-211 to APP-217]** establish the performance standard that there would be no detrimental change to off-site runoff rates or flood risk, with peak flows controlled and betterment against existing greenfield runoff rates achieved where relevant. The location, scale and drainage principles for supporting infrastructure are defined in the Flood Risk Assessment and Drainage Strategy appendices for each development area, including design storm return periods, climate change allowances and attenuation requirements, as detailed in **Appendices 11-2 to 11-9 Flood Risk Assessment and Drainage Strategy [APP-211 to APP-217]**. These principles provide the basis for detailed drainage design, including SuDS component selection, sizing and integration, which is appropriately secured for approval at discharge under Requirement 11 of the **Draft Development Consent Order [APP-016]**

				in consultation with the relevant drainage authority. This approach is consistent with NSIP practice, where performance standards and design principles are established at consent stage and detailed design is developed and approved at discharge following procurement and ground investigation. Construction phase drainage measures are secured through the **Outline CEMP [APP-277]**, with detailed implementation approved under Requirement 13.

SLD-081	Hydrology, Flood Risk and Drainage	Flooding Assessments and Modelling	2.6.8 There is also no assessment of the dynamic effects of flooding, contrary to NPS EN-1 Paragraph 5.8.15, which states that applicants should "*Consider and quantify the different types of flooding (whether from natural and human sources and including joint and cumulative effects) and include information on flood likelihood, speed-of-onset, depth, velocity, hazard, and duration*". Though there is some modelling of the Gauze Brook catchment where this is an issue, the ES presents only flood depths, and there is no assessment of these hydrological parameters.	The Applicant does not agree that the flood risk assessment fails to comply with NPS EN-1 paragraph 5.8.15 or that dynamic effects of flooding have not been adequately considered. The hydraulic modelling of Gauze Brook, detailed in **Appendix 11-6 Flood Risk Assessment and Drainage Strategy – Lime Down B / BESS [APP-214]**, Section 2.3 and Annex B, assesses flood likelihood across multiple return periods (Q2, Q20, Q100, Q1000) with climate change allowances of 39% and 71%, and provides outputs including flood extents, maximum flood depths and maximum water levels. The modelling confirms that predicted flood depths within areas containing solar PV arrays are shallow, predominantly below 0.2m, and that no flooding is predicted within the BESS area or substation compound under any modelled scenario, as stated in **Appendix 11-6 Flood Risk Assessment and Drainage Strategy – Lime Down B / BESS [APP-214]**, paragraph 2.3.9. Formal quantification of velocity, hazard ratings and flood duration is not required where development comprises unmanned solar arrays designed to operate whilst inundated in areas of shallow rural floodplain, with critical infrastructure sequentially located outside flood zones. The dynamic behaviour of floodwater is inherently addressed through the assessment of flood depths and extents under extreme events including climate change, which demonstrates that the Scheme would not increase flood risk elsewhere and would not be subject to unacceptable flood risk. The requirements

				in NPS EN-1 paragraph 5.8.15 are applied proportionately according to the nature of flood mechanisms, the characteristics of the receiving floodplain and the vulnerability of the proposed development. No amendments to the application documents are required.
SLD-082	Hydrology, Flood Risk and Drainage	Flooding and Climate Change	2.6.9 The ES considers the expected effects of climate change in increasing runoff from the Scheme, and in designing flood mitigation structures. The detailed calculations are not presented, and it is not clear what baseline has been used. In Chapter 7 of the ES covering climate change, a similar assessment has been	The Applicant does not agree that climate change effects have been understated or that rainfall baseline selection undermines the hydrological assessments. Climate change driven increases in rainfall intensity and river flows will occur irrespective of whether the Scheme is constructed. The purpose of the

			made using rainfall data from Yeovilton, 68 km away, claiming that this is the closest Met Office station to Lime Down. In fact, there are 11 measurement stations closer to Lime Down which the Met Office recognises as suitable for climate assessments, all of which have a higher rainfall than Yeovilton, which is a lowland site in the rain shadow of the Devon moors. This results in a 14% underestimation of the climate change effects of rainfall at Lime Down, but it is unclear whether this has been applied in the hydrological assessments.	assessment is to test whether the Scheme would materially alter runoff behaviour or increase flood risk relative to the existing baseline under future climate conditions. Climate change is incorporated throughout the assessment using the latest Environment Agency allowances for the relevant management catchments, including peak river flow uplifts and peak rainfall intensity allowances, as detailed in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [APP-063].** These allowances are applied within site-specific hydraulic modelling of Gauze Brook using 39% and 71% peak flow increases, as set out **Appendix 11-6 Flood Risk Assessment and Drainage Strategy – Lime Down B / BESS [APP-214]**, and within drainage design for supporting infrastructure. The assessment concludes that with these allowances applied the Scheme would not increase runoff rates or volumes relative to the existing baseline and would not increase flood risk elsewhere. This conclusion accords with national policy recognition that ground-mounted solar PV generally drains to ground without creating significant drainage impacts where ground cover is maintained (NPS EN-3 paragraph 3.10.75) and is secured through drainage controls in Requirement 11 of the **Draft DCO [APP-016].** The flood risk and drainage assessments are based on Environment Agency mapped datasets, management catchment climate change allowances and site-specific hydraulic modelling rather than rainfall station

				selection, which is addressed separately in the climate change chapter. No amendments to the application documents are required. Yeovilton has been used within **ES Volume 1, Chapter 7: Climate Change [APP-059]** as a nearby met station with historic representative weather data in the format required for assessment as sourced from available Met Office data. This site was chosen as it has data available going back to 1964 to best establish the current baseline, though data from a 30year period (1991-2020) was used for the assessment. The data sites which are available can be viewed at https://www.metoffice.gov.uk/research/climate/maps-and-data/historic-station-data

SLD-083	Hydrology, Flood Risk and Drainage	Flooding	2.6.10 The assessment and proposed management of flood for the Scheme is poor, and reflects a site selection process which failed properly to have regard to Flood Zone 2 and Flood Zone 3 and the knock-on effects. The ExA can have no confidence that this Scheme would not increase the risk of flood in an area already blighted by flood events.	The Applicant does not agree that the flood risk assessment is poor or that site selection failed to have proper regard to Flood Zones. The presence of Flood Zones 2 and 3 within parts of the Site is explicitly recognised in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [APP-063]** and has informed the Scheme design through the sequential approach to locating supporting infrastructure. Critical infrastructure including BESS and substations is located within Flood Zone 1, and solar PV arrays are designed to be flood resilient where shallow flooding may occur, without obstructing floodplain flow routes or materially displacing flood storage. The flood risk assessment considers all relevant sources of flood risk including fluvial, surface water and construction-phase mechanisms, informed by site-specific hydraulic modelling of Gauze Brook as detailed in **Appendix 11-6 Flood Risk Assessment and Drainage Strategy – Lime Down B / BESS [APP-214]**, together with topographic data and historic flood information. The assessment concludes that the Scheme would not increase flood risk elsewhere and would avoid significant adverse effects on flood risk receptors, consistent with national policy requirements. Delivery of embedded and additional mitigation is secured through the DCO, including drainage controls under the Requirement 11 of the **Draft Development Consent Order [APP-016]** and construction-phase controls under the **Outline Construction**

				Environmental Management Plan [APP-277]. No amendments to the application documents are required.

SLD-084	Soils and Agriculture	BMV Land	2.7.1 SLD has concerns about the effects of the Scheme on agricultural land. While best and most versatile ("BMV") land is the beneficiary of significant policy protections, including a preference in para 2.10.29 of NPS EN-3 that development not be on BMV land and "*poorer quality land should be preferred to higher quality land avoiding the use of [BMV] agricultural land where possible*", the Scheme itself (on the Applicant's figures) uses 240ha of BMV land (33% of the Scheme land take total) which the Applicant itself accepts is "*significant*" ([APP-069, para 17.12.2). SLD agrees it is significant, and notes this is not only an impact locally, but also nationally on food security issues which are increasingly pressing. While the Applicant goes on to assert that such impact is only temporary, SLD considers this an oversimplification of the true position: 2.7.1.1 Some losses would be permanent (even after decommissioning) due to soil removal and thick foundations, including 7.85ha of electrical substations, 5.5ha for the BESS, 1.59ha for conversion units totalling 14.94ha. Other areas which would have substantial difficulties in remediation (or would not be removed at all) include tarmac roads and access tracks.	The UK Government Food Security Report (2024) notes that the biggest threat to UK food security is climate change and other environmental pressures such as soil degradation. It notes that there is no planning policy requiring BMV agricultural land to be used solely for food production. The UK Government Food Security Report (2024) further notes that domestic food production and food security are dependent on the sustainability of the whole food system, which includes global factors such as climate change and world conflict, as well as domestic consumer choice and food waste. Although the agricultural land will be removed from arable rotation for the duration of 60 years, the land and soil will continue to provide valuable ecosystem services that could benefit other agricultural land not in the Scheme. The detailed SRMP and DEMP will contain principles of best practice management for land and soil resources, note how degradation will be identified and set out broad principles for remediation should it become necessary. The soils excavated from the footprints of built aspects will be stored on site and available for re-use at decommissioning when the land is reinstated.

SLD-085	Construction and Decommissioning	Mitigation	2.7.1.2 A number of other mitigations require permanent works which would cause a permanent loss (such as joint compounding on the cable route, which would never be decommissioned).	As set out within **ES Volume 1, Chapter 3: The Scheme [APP 055]**, the mode of removing the Interconnecting Cables and Grid Connection Cables decommissioning would be dependent upon government policy and good practice at that time. Currently, the most environmentally acceptable option is considered to be leaving the cables in situ, as this avoids disturbance to overlying land and habitats and to neighbouring communities. Alternatively, the cables can be removed by opening up the ground at regular intervals and pulling the cable through to the extraction point, leaving the ducting and jointing bays in place, avoiding the need to open up the entire length of the cable route. The construction of the cable route has been assessed throughout the **ES [APP-052 to APP-265]**, which considers the likely significant construction effects associated with these works. The **ES [APP-052 to APP-265]** assesses the cable route within defined parameters, including limits on working width and trench dimensions, to ensure that a reasonable worst-case scenario is assessed. An **Outline Decommissioning Strategy [APP-279]** has been prepared which secures the environmental mitigation for the decommissioning stage. The **Outline Decommissioning Strategy [APP-279]** will be developed into a Detailed Decommissioning Strategy post consent as secured by Requirement 20 **the Draft DCO [APP-016].**

SLD-086	Soils and Agriculture	Soil Health	2.7.1.3 Importantly, infrastructure which currently makes the land BMV would be lost, such as irrigation and field drains. It would be left to degrade in the soil and/or permanently be damaged by piling which would never be remedied (such piles for the solar mounting structures being up to 4m deep: [APP-055], para 3.3.5).	Agricultural Land Classification (ALC) is based on the inherent physical characteristics of the soil and site, rather than the presence of agricultural infrastructure. The ALC guidelines confirm that features such as irrigation are not taken into account when determining land grade. The agricultural land classification across the Site has been informed by detailed soil survey work undertaken by a suitably qualified soil scientist and is reported in **ES Volume 3, Appendix 17 1: Agricultural Land Classification and Soil Resource Survey Report [APP 243].** That survey did not identify evidence of field drainage influencing the classification, and land grades were determined on the basis of soil characteristics. Accordingly, the assessment concludes that the removal or damage of irrigation or drainage infrastructure would not alter the ALC grading of the land, and therefore would not affect the conclusions of the soils and agricultural land assessment reported in **ES Volume 1, Chapter 17: Soils and Agriculture [APP 069].**

SLD-087	Soils and Agriculture	Soil Compaction	2.7.1.4 The same is true of the effects of deep compaction or damage to the soil when it is worked in wet weather. This again poses a significant risk of permanent damage and degradation of the soil which would not be remedied after decommissioning.	The management of soil handling and the avoidance of compaction during construction are addressed within the **Outline Soil Resources Management Plan (SRMP) [APP 280]**. The Outline SRMP sets out handling criteria and indicative soil handling windows during which soils are least susceptible to damage from trafficking and compaction. The Outline SRMP includes measures to avoid working soils in unsuitable conditions, including a requirement that soil handling activities will cease if conditions are, or become, too wet. Soil moisture condition can be readily assessed through basic field tests. The Outline SRMP confirms that a suitably qualified soil professional will undertake initial soil condition testing and will instruct designated site operatives on the methodology to be applied. This ensures that soil conditions are kept under continual review throughout construction and that soils are only worked under appropriate moisture conditions. The assessment of effects on soils and agricultural land, including the risk of compaction and long term soil damage, is reported in **ES Volume 1, Chapter 17: Soils and Agriculture [APP-069]**. The framework provided by the SRMP is intended to prevent permanent soil damage and to support appropriate reinstatement of land following construction and at decommissioning.

SLD-088	Soils and Agriculture	Decommissioning of Agricultural Land	2.7.2 Similar considerations apply to the cable route, where 75% of the land is BMV. While land loss should be for a time-limited period, there would be some permanent loss for infrastructure and access which is unlikely ever be remediated. Portions of the restored land are unlikely to return to the same standard; drainage may have been disturbed (e.g. the severing of land drains), and heat from the cables can dry drought-prone soils in dry summers, leading to crop failure. The cable route has not been surveyed in the same detail as the panel areas, and it is possible that some problematic soils have been missed.	Built development within the cable route would be limited and would mainly comprise access tracks required for maintenance activities. The **Outline Construction Environmental Management Plan (CEMP) [APP-277]** confirms that existing access tracks would be utilised where possible. Where new access tracks are required, these would be sited to avoid crossing drainage ditches and, where practicable, would be located on the lowest quality agricultural land within each parcel. Construction activities associated with the cable route, including the installation of access tracks, would be undertaken in accordance with best practice principles set out in the **Outline Soil Resources Management Plan (SRMP) [APP 280].** Details of cable installation are provided in **ES Volume 1, Chapter 3: The Scheme [APP-055]**. This confirms that cable trenches would be constructed to a minimum depth of 1.2 metres and a maximum depth of 2 metres (unless ground conditions mean this is not possible). The agricultural soil profile is considered to extend to approximately 1.2 metres, and therefore the cables would be installed beneath the root zone of common agricultural crops. As a result, no additional drought stress to crops from cable heat is anticipated. With regard to baseline conditions, soil survey data has been obtained for all accessible land within the cable route corridor and has informed the assessment and design of the Scheme.

SLD-089	Soils and Agriculture	Soils	2.7.3 There are remaining concerns in relation to the risks to soils during the construction phase and the mitigation measures proposed. Chapter 17 notes that soils on all sites are saturated with water for a much higher proportion of the time than the English lowland average, amounting to half the year on Areas A, B, and C. This is of concern, given these are the times when construction risks damaging soils. The mitigation measures proposed are insufficiently specific.	The assessment of effects on soils and agricultural land is provided in **ES Volume 1, Chapter 17: Soils and Agriculture [APP-069**], with supporting baseline information presented in **ES Volume 3, Appendix 17 1: Agricultural Land Classification and Soil Resource Survey Report [APP 243].** The assessment refers to field capacity days as a recognised climatic parameter used to indicate periods when soils are at field capacity or saturated. Field capacity is not equivalent to saturation. At field capacity, soil micropores are full while macropores remain drained, and this condition is typically considered optimal for plant growth. The metric of field capacity days therefore captures a range of soil moisture conditions, including both field capacity and periods of saturation, and does not indicate that soils are saturated for the entire duration referenced. The use of this parameter has informed the assessment of potential soil risks during construction and the identification of appropriate mitigation measures. Construction activities would be undertaken in accordance with best practice soil handling and management measures set out in the **Outline Soil Resources Management Plan (SRMP) [APP-280]**, which has been prepared to manage risks to soil structure and quality during periods of higher soil moisture.

SLD-090	Soils and Agriculture	Soils	2.7.4 SLD also notes that the soil characteristics have been almost totally ignored in the development of the Scheme. As noted above, the report states that the soils stay saturated (at field capacity) for an unusually high proportion of the time, and that permeability is low in 3 of 4 commonest soil associations. Both these facts correlate with the flood-proneness of the area, and make the soils susceptible to erosion by surface runoff. They also make the soils vulnerable to compaction, which would further reduce infiltration and permanently degrade the land quality. The problem of compaction is recognised in the ES ([APP-069], para 17.8.1) but the mitigation measures proposed are inadequate, and the long-term effects disregarded. Indeed, there is a strong argument for not allowing any construction on site between November and April, but this has not been considered as a mitigation strategy.	An assessment of soil characteristics and potential effects on soils and agricultural land is provided in **ES Volume 1, Chapter 17: Soils and Agriculture [APP-069]**, with supporting baseline information set out in **ES Volume 3, Appendix 17 1: Agricultural Land Classification and Soil Resource Survey Report [APP 243]**. As explained in response to representation 2.7.3, the assessment refers to field capacity days, which is a recognised climatic parameter indicating periods when soils are at field capacity or saturated, and does not equate to soils being saturated continuously for the duration identified. The assessment also recognises the potential for soil compaction during construction, including where soils have higher moisture content, and this is explicitly acknowledged within **ES Chapter 17 [APP-069].** Across the Scheme, land would remain in permanent grassland during operation, which is less susceptible to erosion than arable land. Continuous vegetation cover also reduces the velocity of surface water runoff compared to bare soil, thereby limiting erosion risk. Mitigation measures to manage risks of soil erosion and compaction during construction are set out in the **Outline Soil Resources Management Plan (SRMP) [APP-280]**. This includes the establishment of defined soil handling windows and handling suitability testing criteria to ensure that soil stripping, handling and trafficking are undertaken only when conditions are suitable, in accordance with best practice guidance.

SLD-091	Soils and Agriculture	Use of Agricultural Land and Soil Quality	2.7.5 It is suggested in several places that taking land out of arable production would lead to an improvement in soil quality in the long term. There is no proper evidence that this occurs where solar farms have replaced arable agriculture in a 60-year timescale, as the technology has not existed for that long. The small amount of evidence for the UK suggests that for the first 10 years, soil under the panels is degraded while in the gaps between the panels it is not significantly different from outside. Compaction is evident and still dominates the soil responses, outweighing the theoretical expectation that deep rooting grasses and permanent grassland will increase organic matter and improve soil structure relative to arable. It should also be noted that many of the panel fields at Lime Down are grassland already, in which case there may be little difference expected. Any soil improvement due to replacement of arable by solar panels must be regarded as highly uncertain. This is further emphasised by the fact that, from para 17.10.21 of [APP-069], it is unclear whether there has been any assessment of the disturbance effects of removal of the solar panels and mounting framework themselves.	The assessment of effects on soils and agricultural land is set out in **ES Volume 1, Chapter 17: Soils and Agriculture [APP-069],** with supporting baseline information provided in **ES Volume 3, Appendix 17 1: Agricultural Land Classification and Soil Resource Survey Report [APP-243].** The assessment recognises the susceptibility of soils to compaction and structural damage and does not rely on assumed long term improvements in soil quality as a form of mitigation. The ES acknowledges that soil compaction is a potential risk arising from construction activities and that this may influence longer term soil condition if not appropriately managed. Accordingly, the assessment focuses on avoiding and minimising soil damage through construction phase mitigation, rather than placing weight on uncertain soil recovery outcomes during operation. The Scheme does not assume uniform soil improvement across all areas. Baseline conditions, including land that is already under grassland at the time of survey, have been taken into account within the assessment, and effects are considered relative to existing land use rather than on the basis of an assumed transition from arable production. While there is limited direct evidence relating to soil responses beneath solar panels over a 60 year operational period, wider research into land use change provides contextual information. A recent study by the Centre for Ecology and Hydrology found that less intensively managed grassland was associated with

				improved indicators of soil health, including increased soil carbon and nitrogen and greater soil invertebrate abundance. This evidence is not specific to solar development and does not remove uncertainty; however, it provides relevant context for understanding potential soil responses where land management intensity is reduced. Potential soil disturbance associated with the full lifecycle of the Scheme, including installation, operation and removal of infrastructure, has been considered within **ES Chapter 17 [APP-069]**. Mitigation measures to manage soil handling and compaction risks are set out in the **Outline Soil Resources Management Plan (SRMP) [APP-280]**, which establishes best practice soil management controls to protect soil structure and quality.

SLD-092	Hydrology, Flood Risk and Drainage	Field Drainage	2.7.6 Specifically considering drainage, there is no assessment of the current status of field drainage, or any commitment to restore drainage after construction. The Outline Soil Resources Management Plan does not mention field drainage at all, nor is there assessment of how many existing land drains would be damaged by piling [APP-280]. Given the wet condition of large parts of the site, the neglect of this issue is likely to lead to increased runoff and soil erosion.	Construction phase drainage and the protection of existing land drainage are addressed within the **Outline Construction Environmental Management Plan (CEMP) [APP-277]**. The Outline CEMP includes a commitment to identify all land drains within the Order Limits prior to construction and to ensure that these are adequately protected during construction activities. Baseline soil survey work undertaken across the Order Limits, as reported within **ES Volume 3, Appendix 17 1: Agricultural Land Classification and Soil Resource Survey Report [APP-243]**, has identified two principal soil types. One of these comprises shallow brashy soils over limestone, which are naturally well drained and would not be expected to contain underlying field drainage systems. Potential effects on surface water runoff and soil erosion have been assessed within **ES Volume 1, Chapter 17: Soils and Agriculture [APP-069],** and are managed through construction phase controls. Measures to manage soil handling, ground conditions and erosion risk during construction are set out in the **Outline Soil Resources Management Plan (SRMP) [APP-280]** and the **Outline CEMP [APP-277].** In relation to field drainage and surface water management, the assessment in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [APP-063]** demonstrates that the Scheme would not result in increased runoff or adverse drainage impacts. Solar PV arrays are

				elevated and allow rainfall to drain to ground beneath and between panels, maintaining existing drainage pathways. Where land drains are present, protection measures secured through the **Outline Construction Environmental Management Plan [APP-277]** ensure they are identified and safeguarded during construction. The introduction of permanent grass cover and elimination of trafficking beneath panels improves soil structure and infiltration capacity relative to the existing arable baseline, reducing rather than increasing runoff and erosion risk over the operational lifetime. The assessment concludes that the Scheme would not increase flood risk elsewhere or result in adverse off-site drainage impacts.

SLD-093	Socio-Economics, Tourism and Recreation	Socio-economic Impact on Tenant Farmers	2.7.7 Finally, and viewed from a local perspective, the loss of agricultural land would have significant effects on some individuals: a number of tenant farmers are likely to be severely affected, to the extent of making their farms economically unviable and thus losing their livelihoods. This has apparently not been considered in the choice of areas. Whilst statutory compensation is a legal requirement, it will not replace lost land or cover the long-term disruption to farm holdings.	The Applicant has been in discussions with landowners and these discussions have included arrangements regarding existing tenancies. The Applicant has considered that there is a likely worst-case loss of 20 FTE agricultural jobs as a result of the Scheme, as has been assessed in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]**. The Applicant is cognisant of the impact the Scheme could have on wider agricultural employment associated with tenancies and contracts and so seeks to source ways of retaining agricultural workers, providing reskilling opportunities, or providing re-employment as supported by the measures secured in the **Outline Skills, Supply Chain and Employment Plan [APP-285]**.
SLD-094	Description and DCO Process	Noise Assessment	2.8.1 Chapter 14 of the ES presents the findings of an assessment of the likely significant effects on noise and vibration as a result of the Scheme. SLD has appointed experts to undertake a review of the noise impact information presented in Chapter 14 [APP 066], as well as the supporting appendices.	The Applicant notes this comment.
SLD-095	Noise and Vibration	Noise Assessment	2.8.2 The development, in its current form, would change the context of the existing soundscape from a very (at times extremely) quiet rural environment to one containing constant sounds of a more industrial nature. Noise emissions during the operation of the solar development would be from the fixed plant items associated with electricity transformers and inverters, BESS, and potentially from	The ambient noise climate, defined in Table 1 of **ES Volume 3, Appendix 14-1: Acoustic Terminology [APP-234]** in terms of the equivalent continuous sound pressure level, would not change as a result of the Scheme. This is evidenced by the LAeq,T values in Table 7 of **ES Volume 3, Appendix 14-4: Noise Modelling [APP-237]** (representing noise from the Scheme) being well below those

			solar PV panel tracker motors. Operation of plant would be continuous, with the exception of the conversion units and smaller 132kV Substations which would operate only during daylight hours. 2.8.3 The potential change in ambient noise climate is not properly recognised or considered in the ES. 2.8.3.1 In simplistic terms, the Applicant's noise assessment methodology predicts the anticipated level of noise from the plant at noise sensitive receptors and compares this with the existing underlying background noise level, taking any characteristics of the noise into account. This provides an indication of how noticeable a specific sound may be. Relying on this information, the Applicant has defined a "*Significant Adverse Effect Level"* ("SOAEL") on the basis of noise which exceeds the background by 10dB. The Lowest Adverse Effect Level is defined to be 5dB below the background level.	in Table 1 of **ES Volume 3, Appendix 14-3: Baseline Noise Survey [APP-236]** (representing the current ambient sound levels in the area). With reference to Table 14-9 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**, the SOAEL is actually defined more stringently at only 5 dB above the typical background level, and no residential dwellings are expected to experience levels in excess of this value. The change to the background sound climate or existing soundscape is acknowledged in paragraph 14.6.28 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]** and a 3 dB penalty to noise levels from the Scheme has been applied to associated calculations as a result.

SLD-096	Noise and Vibration	Noise Assessment	2.8.3.2 Informed by the noise monitoring surveys undertaken, the Applicant has selected and applied a single background noise level value for receptors. This has been apparently selected from a 'median value' of the representative datasets. However, this means that for 50% of the time, background levels would be lower than the figure used and the resultant impact from the Applicant's noise sources would be greater than shown for a significant proportion of the time.	As explained in Paragraph 1.2.6 of **ES Volume 3, Appendix 14-3: Baseline Noise Survey [APP-236]**, representative background sound levels were derived from a statistical analysis of the spread of data illustrated in Plates 29 to 56 of **ES Volume 3, Appendix 14-3: Baseline Noise Survey [APP-236]** in line with appropriate guidance given in BS4142:2014+A1:2019. As stated in BS4142:2014, *"the objective is not simply to ascertain a lowest measured background sound level, but rather to quantify what is typical during particular time periods"* and *"A representative level should account for the range of background sound levels and should not automatically be assumed to be either the minimum or modal value."* The typical background sound levels, presented in Table 1 **of ES Volume 3, Appendix 14-3: Baseline Noise Survey [APP-236]**, are close to but not always the same as the modal levels and result from the use of professional judgement to mitigate the influence of outliers or skewed data. All presented values are deemed representative of the typical L_{A90} levels for the specified measurement periods and are established in accordance with the guidance provided in BS4142:2014. Background levels throughout the measurement period can fall below the 'typical background', however these would not be considered typical.
SLD-097	Noise and Vibration	Noise Assessment	2.8.3.3 Connectedly, the noise assessment fails to make any observations regarding the existing soundscape within the baseline noise	Paragraph 14.7.3 **of ES Volume 1, Chapter 14: Noise and Vibration [APP-066]** makes observations regarding the existing soundscape. These are not

			survey appendices or assessment chapter. It is assumed that the soundscape at the time of the survey was primarily determined by very low levels of distant road traffic, wind noise and local wildlife. No description of the noise monitoring equipment, or type and locations of weather stations used is provided.	assumed but rather based on first-hand experience of the local area from conducting the baseline surveys. As is standard practice for most DCO applications, for example Tillbridge Solar Project [EN010142] or Fosse Green Energy [EN010154], the monitoring equipment is not described explicitly in the ES. With reference to **ES Volume 3, Appendix 1-1: Statement of Competence [APP-180]**, the Applicant can confirm that all surveys were conducted with calibrated Class 1 sound level meters. High level information with respect to weather stations is provided in Section 1.3 of **ES Volume 3, Appendix 14-3: Baseline Noise Survey [APP-236]**.
SLD-098	Noise and Vibration	Noise Assessment	2.8.3.4 The noise assessment methodology also disregards background levels lower than 30dBLA90, using this value as a fixed lower threshold background level and defining anything below this as a 'low' background level. The rationale provided is "*This method avoids overstatement of potential impacts at receptors when background levels are low…*" However, at the majority of sites where monitoring was undertaken, existing daytime background noise levels are shown to fall to very low levels (less than below 20dBLA90) and be significantly lower than the median values used. The Applicant's noise assessment does not make the fact clear that for a great majority of the receptors, existing background noise levels can be very low, and commonly fall to extremely low levels during the daytime	A full justification for the lower limit on background sound levels, including reference to appropriate guidance, is provided in Section 14.6 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**. This is a conservative approach when compared to other solar DCOs which have been granted consent, such as Tillbridge Solar Project [EN010142] which is also in a quiet rural area, where a lower limit of between 30 and 45 dB was applied. This approach to the Scheme was agreed with Wiltshire Council as stated in Table 14-2 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**.

			and night-time. As a consequence, the effect on the existing soundscape has been underestimated. 2.8.3.5 By setting the assessment thresholds at 30dBLA90, (and the plant noise assessment threshold level at 35dB), the Applicant dispenses with any comparison against background levels. It effectively renders the background noise survey, which quantifies the very quiet nature of the setting, entirely redundant. That survey shows anticipated significant changes in noise level and character and a significant potential to cause an adverse or significant adverse impact on residents.	
SLD-099	Noise and Vibration	Review of the data obtained at monitoring location LT8.	2.8.4 There are a number of inconsistencies and uncertainties in the data obtained. By way of an example, SLD's noise experts conducted a specific review of the data obtained at monitoring location LT8. 2.8.4.1 The ranges presented in Table 14-7, Chapter 14 are not consistent with the measured data. Table 14-7 presents a daytime background range of 34-38dBLA90 and a night-time range of 25-41dBLA90. However, Plate 8 clearly shows that levels at location LT8 can fall below 30dBLA90 during the day and down to 20dBLA90 at night. It is therefore not clear how these ranges have been determined, or whether they are correct. 2.8.4.2 Weather records from a nearby weather station were investigated by the noise experts. It was noted that historical data shows there was a significant rainfall on Saturday 28th October 2023, likely to have resulted in	Table 14-17 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]** presents the range of background sound levels for the periods listed in the table header i.e. LA90,T where T is 07.00-23.00 for the daytime and 23.00-07.00 for the night-time. The plates in **ES Volume 3, Appendix 14-3: Baseline Noise Survey [APP-236]** show time histories of the background sound with data points every 15 minutes. The range of levels over every 15-minute period will be larger than the range of levels across a full daytime or night-time period. The Applicant accepts that data from 28 October 2023 should be discounted from the analysis of the background levels due to adverse weather conditions. However, the purpose of the analysis of such levels is to discount such outliers in the data. As such the Applicant does not consider this to have had a material effect on the

			the a-typical spike in levels above 50dB as seen in the centre of the chart. That does not appear to have been discounted when presenting the statistical distribution of background noise levels. 2.8.4.3The statistical distribution of background levels at location LT8 is presented as a histogram in Appendix 14-3 Plate 36. This appears to show the actual ranges of background levels. The Applicant appears to have selected a single-figure daytime and night-time value for subsequent use in the assessment, with no rationale of justification for selection of these values provided in the ES.	background levels used in the assessment. As explained in Paragraph 1.2.6 **of ES Volume 3, Appendix 14-3: Baseline Noise Survey [APP-236]**, representative background sound levels were derived from a statistical analysis of the spread of data illustrated in Plates 29 to 56 of **ES Volume 3, Appendix 14-3: Baseline Noise Survey [APP-236]**, in line with appropriate guidance given in BS4142:2014+A1:2019. As stated in BS4142:2014, *"the objective is not simply to ascertain a lowest measured background sound level, but rather to quantify what is typical during particular time periods"* and *"A representative level should account for the range of background sound levels and should not automatically be assumed to be either the minimum or modal value."* The typical background sound levels, presented in Table 1 of **ES Volume 3, Appendix 14-3: Baseline Noise Survey [APP-236]**, are close to but not always the same as the modal levels and result from the use of professional judgement to mitigate the influence of outliers or skewed data. All presented values are deemed representative of the typical L_{90} levels for the specified measurement periods and are established in accordance with the guidance provided in BS4142:2014+A1:2019. Background levels throughout the measurement period can fall below the 'typical background', however these would not be considered typical.

SLD-100	Noise and Vibration		2.8.4.4 In any case, it is clear that background levels appear to be below the selected daytime value for more than 50% of the time, falling to 11dB or lower. A precautionary approach ought to have been adopted, selecting a lower range of background levels commonly occurring. In this instance, a value in the range of 23-25dBLA90 at night, and around 30dBLA90 during the day. Targeting a lower fixed noise rating level threshold, commensurate with a precautionary appraisal of the range of existing background noise levels which are prevalent in the area, would be more appropriate.	As explained in the responses above, the aim is to compare noise from the Scheme to typical background sound levels, not the lowest range of background sound levels. It is important to note the background sound metric, LA90, represents the A-weighted sound level that is exceeded for 90% of the measurement period, ensuring that the chosen typical value encompasses more than 90% of the measured ambient levels throughout the entire measurement duration. In other words, while noise from the Scheme will be audible in some locations at the quietest times of the day, most of the time it will be below existing levels and therefore not likely to have a significant impact on health and quality of life. With reference to BS4142:2014+A1:2019, a partially open window would provide around 10 dB of attenuation, and 30 dB is required for a good night's sleep. This helps demonstrate why night-time background levels of 23-25 dB for the assessment, for example, would not be appropriate. As the SOAEL is defined as 5 dB above background (see Table 14-9 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**), this would imply external levels of 28-30 dB, and internal levels of 18-20 dB were significant. This is not reasonable since such levels would be effectively inaudible and much quieter than regular household appliances on stand-by.
SLD-101	Noise and Vibration	Noise Levels at Receptors	2.8.4.5 Although assessed as being at the SOAEL, the Applicant's assessment defines the noise levels as "*low*" and concludes that no significant effects	With reference to the Applicant's response to Wiltshire Council, the **Outline OEMP [APP-278]** will be amended to clarify that levels at all receptors from the

			would occur after "*all reasonable measures to reduce operational noise levels at receptors"* have been taken into account.	final design would be below SOAEL and is to be submitted at Deadline 1 of Examination
SLD-102	Noise and Vibration	Noise Modelling	2.8.5 The Applicant's noise modelling contains sparse detail in relation to the embedded mitigation measures proposed, stating that "*all reasonable measures to reduce operational noise levels at receptors to a minimum have been taken into account."* A level of uncertainty remains as to whether additional mitigation measures (barrier, enclosure, equipment silencing) are available to reduce noise emissions levels. Additionally, only 7 of the 166 conversion units have been allocated silencers within the assessment.	The **Outline OEMP [APP-278**] commits to a 2m bund and 3m barrier around the eastern and southern boundary of the central BESS Area. The **Outline OEMP [APP-278]** purposely does not commit to specific plant mitigation to allow for design flexibility, given the technological changes affecting noise emission levels that may occur between the time of the assessment and operation of the Scheme. For example, if quieter BESS inverters or Conversion units can be used the number of silencers could be over specified, and conversely if louder units are required additional mitigation would be necessary. The assessment reported in **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]** demonstrates that noise levels that are not significant can be achieved with appropriate mitigation and the **Outline OEMP [APP-278]** commits to this by stating *"…noise at sensitive receptors will be no higher than the levels presented in Section 14.10 of Chapter 14: Noise and Vibration of the ES [EN010168/APP/6.1] and these levels will be set out in the detailed OEMP."* This commitment will be met through a remodelling of the Scheme once the design is finalised. The calculated levels at properties would then inform the precise level of mitigation required to meet the levels presented in the ES. The outcome of such an exercise would be reported to the relevant planning authority to confirm that significant levels of noise

				from the Scheme have been avoided. Extra wording will be added to the **Outline OEMP [APP-278]** and submitted at Deadline 1 of Examination to clarify this point. This is a common approach, focusing directly on the end goal of low noise levels, that has been adopted in consented Schemes such as the Tillbridge Solar Project [EN010142]. It is likely that a significant amount of noise mitigation, in line with that listed in Paragraph 14.9.12 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**, would be required to achieve these levels. As explained in the Noise Policy Statement for England and discussed **in ES Volume 3, Appendix 14-1: Noise and Vibration Legislation, Policy and Guidance [APP-234],** mitigation should be applied *"…within the context of Government policy on sustainable development" including the "…need to integrate consideration of the economic and social benefit of the activity…".* By committing to avoid significant adverse effects, which is likely to require silencers and enclosures in addition to the bund and barrier around the central area, the Applicant considers that all reasonable noise mitigation measures, within the context of sustainable development, have been taken.

SLD-103	Noise and Vibration	Noise Impacts	2.8.6 The noise chapter describes an operational management plan (OEMP) that commits the Scheme to achieving to the "*resulting levels*" (i.e. the noise levels as calculated within the ES Noise Chapter) at properties *"to provide reassurance that the Scheme as built will not lead to significant effects from noise*." At these committed levels, however, there is a likelihood that noise from the development would be clearly audible at times, with the associated loss of very low background noise levels prevalent in the area. This would result in a permanent change in the soundscape of the area.	The Applicant acknowledges that in such a quiet existing environment the Scheme will, at times, be audible in certain locations. However, through careful design and mitigation, noise levels will largely be below the existing sound in the area. Even when they are above this, the levels will still be low in absolute terms with the highest level in Table 8 of **ES Volume 3, Appendix 14-4: Noise Modelling [APP-237]** being 37 dB which is no louder than a typical household refrigerator. Therefore, while it may be considered that there would be a small permanent change to the soundscape of the area, this does not constitute a significant impact on health and quality of life, and the Scheme is in compliance with relevant Government policy in terms of noise emissions.
SLD-104	Other Environmental Matters	Glint and Glare	2.9.1 Assessment of glint and glare is an important consideration in the development of solar projects. Studies have shown that glint and glare can pose a significant risk to air, rail and road users, and other receptors. It can also impact upon recreational uses, including equestrian (there are a number of studs and equestrian businesses in the area). 2.9.2 [APP-261] provides a report on the assessment of Glint and Glare from solar PV panels. The Glint and Glare Assessment ("GGA") concludes that in terms of the effects of glint and glare arising from the proposed solar arrays, "*[n]o significant impacts are predicted upon road safety, residential amenity and aviation activity associated with North Weald Airport, Stapleford Aerodrome,*	The Applicant acknowledges that glint and glare is an important consideration for solar developments. **ES Volume 3, Appendix 20-4: Solar Photovoltaic Glint and Glare Study [APP-261]** assesses all relevant receptor groups, including roads, residences, railways and aviation. The Assessment concludes that "*no significant impacts are predicted towards residential amenity, road safety and railway operations, considering the embedded mitigation. No additional mitigation is recommended.*" These conclusions are based on a precautionary worst-case modelling scenario using industry-standard methodology and receptor screening assumptions.

			Jenkins Farm Airfield, South Weald Private Airfield and Willingale Airfield. No mitigation is recommended."	**Appendix 20-4: Solar Photovoltaic Glint and Glare Study [APP-261]** does not consider or assess the airfields listed by SLD (North Weald, Stapleford, Jenkins Farm, South Weald, Willingale) as these airfields are located in Essex rather than Wiltshire. The Applicant therefore considers that the Glint and Glare conclusions have been correctly stated in the ES and that no significant adverse glint and glare effects are predicted for any receptors associated with the Scheme.
SLD-105	Other Environmental Matters	Glint and Glare	2.9.3 In SLD's view, the method used and approach taken in the GGA is flawed and not reliable for decision-making purposes. The following issues are taken: 2.9.3.1 SLD consider that the GGA has adopted a flawed approach and that the potential impacts of glint and glare from the Scheme have been understated.	The Applicant does not agree that the potential impacts of glint and glare from the Scheme have been understated. **ES Volume 3, Appendix 20-4: Solar Photovoltaic Glint and Glare Study [APP-261]** has used Pager Power's Glint and Glare Guidance (4th Edition) to guide the methodology, which is consistent with available guidelines and policy in the UK and internationally. This methodology has been utilised for over 1,800 Glint and Glare Assessments worldwide, including many consented solar DCOs. The assessment concludes that, with embedded mitigation measures, including the use of fixed-tilt panels at a maximum height of 2.5 metres where required, no significant glint or glare effects are predicted to occur.

SLD-106	Other Environmental Matters	Glint and Glare - Screening	2.9.3.2 SLD have concerns as to whether the proposed mitigation measures would be suitable and effective to reduce the risk of glint and glare. As in the case of landscape and visual impact, there appears to have been an overreliance on vegetation and planting to reduce the effects of the Scheme.	As per **Chapter 20: Other Environmental Matters, Section 20.5 Glint and Glare [APP-072],** mitigation has been proposed for all significant impacts and once mitigation is implemented, no significant residual impacts are identified. Vegetation is a suitable mitigation measure for Glint and Glare effects, as this can obstruct views of reflecting areas and prevent impacts from being visible. In terms of landscape and visual impact, the effects of proposed mitigation have been assessed at Year 1 and Year 15 in line with industry guidelines.
SLD-107	Other Environmental Matters	Glint and Glare - Local Road Users	2.9.3.3 The GGA has only assessed major national, national, and regional roads. This means that there has been no assessment of the effects of glint and glare on the safety and visual / other amenity of users of local roads and lanes. SLD consider that the omission of local roads from the GGA is significant, not least as while many are rural they are still much used.	As per the methodology set out in **ES Volume 3, Appendix 20-4: Solar Photovoltaic Glint and Glare Study [APP-261]** technical modelling is not recommended for local roads, where traffic densities are likely to be relatively low, under Pager Power's Glint and Glare Guidance. Any solar reflections from the Scheme that are experienced by a road user along a local road would be considered low impact in the worst case, due to the relative traffic densities and potential impacts. This is consistent with the approach taken for other solar DCOs.
SLD-108	Other Environmental Matters	Glint and Glare - PRoW Users	2.9.3.4 The GGA has not assessed the impacts of glint and glare on pedestrians, cyclists, and equestrians making use of PRoWs. This is clearly unsatisfactory, given the effects of glint and glare could be significant and put people off using PRoWs. The potential effect of glint and glare on horses has also not been considered.	**ES Volume 3, Appendix 20-4: Solar Photovoltaic Glint and Glare Study [APP-261]** has considered impacts upon PRoW in Section 8 which also considers the impact upon horses using bridleways in the context of guidance from the British Horse Society. There is considered to be lesser potential for safety impacts upon PRoW as there is reduced traffic density and speed compared to roads. It is not

				considered that there would be a significant impact upon amenity, as users of a PRoW can move beyond the solar reflection zone easily and users will already experience effects from low sun which are very similar. The assessment of impacts of the Scheme on PRoW user experience and amenity in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** has, to a limited extent, considered glint and glare impact on users. This has not substantially altered the assessment methodology as glint and glare impacts are anticipated to be limited to times of day around sunrise and sunset where low sun angle is already a consideration for PRoW users.
SLD-109	Other Environmental Matters	Glint and Glare - Cumulative Effects	2.9.3.5 The GGA did not assess the cumulative effects of glint and glare that would arise in combination with other schemes. This is a major omission which should be rectified.	For cumulative impacts to be a consideration, other solar projects must be located either directly adjacent to the site (for aviation receptors) or within 2km of the solar panel areas (for other receptors). No significant cumulative schemes have been identified for assessment and no impact is predicted.
SLD-110	Other Environmental Matters Landscape and Visual	Glint and Glare - Landscape and Visual Impacts	2.9.4 The effects of glint and glare have not been properly taken into account in relation to other features of the Application: 2.9.4.1 The LVIA does not appear to take into account the impacts of glint and glare on landscape character and visual amenity. SLD's landscape expert has assessed glint and glare as resulting in high levels of adverse effects on landscape character, and certain visual receptors could experience significant	The LVIA considers the conclusions of the **ES Volume 3, Appendix: 20-4 Solar Photovoltaic Glint and Glare Study [APP-261]** in association with an assessment of the magnitude of Landscape and Visual impacts using the methodology prescribed above. The potential for cross-topic effects with Glint and Glare has been inherently considered as part of this LVIA.

			adverse visual effects.	
SLD-111	Other Environmental Matters Ecology and Biodiversity	Glint and Glare - Wildlife Impacts	2.9.4.2 It is well-documented that glint and glare can adversely affect wildlife, especially birds and bats. This should have been factored into the ecological assessment.	The Applicant disputes that there is any strong evidence to indicate glint and glare from solar PV panels can adversely affect wildlife. A small number of articles have identified adverse impacts on birds resulting from mirrored light reflected from a concentrated solar system, which uses mirrors to concentrate sunlight onto a central tower containing a fluid which is heated and then used to heat water, which powers a turbine. Concentrated solar systems are not present in the UK, nor are they proposed on this Scheme. There is also some evidence that solar PV panels can reflect light in a way that some wildlife perceive as water. This is documented in some invertebrates and hypothesized from some birds although evidence is lacking to date. There is no evidence that such an impact could have significant adverse effects on populations of invertebrates or birds. There is currently no scientific evidence that links glint and glare from solar PV panels with adverse impacts on bats.

SLD-112	Other Environmental Matters Cultural Heritage	Glint and Glare - Heritage Impacts	2.9.4.3 Glint and glare can affect the settings of heritage assets, both in terms of how the asset is perceived and experienced within the landscape, as well as specific views to and from assets. This should have been factored into the heritage assessment.	The Applicant notes the comment. The potential effects of glint and glare have been assessed within the **ES Volume 3, Appendix 20-4: Solar Photovoltaic Glint and Glare Study [APP-261]**. The heritage assessment considers changes to the setting of heritage assets, including how assets are experienced within the landscape and views to and from heritage assets, and concludes that glint and glare would not give rise to significant effects on the significance or setting of heritage assets.
SLD-113	Other Environmental Matters Human Health	Glint and Glare - Mental Health	2.9.4.4 Glint and glare can have significant effects on mental health for all receptors; given the proposed scale of the proposed development, and the fact that there is no existing research or evidence of the health implications for a solar development of this scale using the proposed tracker PV panels, and the potential mental health effects on the local community, this matter should be considered during the examination.	**ES Volume 3, Appendix 20-4: Solar Photovoltaic Glint and Glare Study [APP-261]** considers effects upon safety (in relation to aviation, roads and railway) and amenity (in relation to dwellings and sensitive viewpoints). The assessment shows that impacts upon amenity are considered not to be significant. Glint and glare has not been considered separately to general impacts on amenity in the assessment of health and wellbeing impacts in **ES Volume 1, Chapter 18: Human Health [APP-070]**. This is due to the assessment outcomes that glint and glare impacts on residential receptors are not anticipated to be significant.

SLD-114	Socio-Economics, Tourism and Recreation	Impacts on Amenity	2.10.1 SLD considers that many of the effects of the Scheme would have a significant and negative effect on recreational, social, and residential amenity. 2.10.2 The full justifications for this conclusion will be set out in SLD's WR, but below is an example, relating to effects on PRoWs.	The Applicant has aimed to provide a robust assessment of impacts to recreation in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068],** while impacts to the social environment and on residential amenity have been assessed in **ES Volume 1, Chapter 18: Human Health [APP-070**], with reliance **on ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**. The Applicant has set out to identify where residual significant adverse effects (such as to specific PRoW and long-distance recreational routes) remain following implementation of additional mitigation measures.
SLD-115	Socio-Economics, Tourism and Recreation	Recreational and Residential Amenity	2.10.3 The Scheme is crossed by numerous PRoWs connecting the various villages in the area. Given its proximity to the CNL and the open rural nature of the area, the PRoWs and other routes are very popular with and well-used by residents and visitors alike (including many equestrians and cyclists). SLD will provide evidence of this in due course. 2.10.4 A key feature of many of the PRoWs is their connection to the CNL. This is already addressed in respect of the Fosse Way, but SLD will produce evidence of how other routes are used to connect into the CNL. This includes the Sherston Walks guidebook which details a number of routes which connect the sites of the Scheme and its surrounds with the CNL. By industrialising the landscape around these routes, their connection and nature as the setting of the CNL would be eroded. Such an effect on PRoWs is necessarily harmful to them and would discourage their use; as a	The assessment in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** and the supporting **ES Volume 3 Appendix 16-2 Tourism and Recreation Receptor Tables [APP-241]** have assessed the likely impacts of the Scheme at construction, operation, peak replacement, and decommissioning on all PRoW, unsurfaced highways, the local highway network, and any permissive routes made known to the Applicant. Assessment of the likely impact on the CNL has been considered separately as both a landscape and visual impact in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**, and as a tourism destination in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068].** The assessment in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** concludes that there is no

			result, the Scheme does not *"protect and enhance public rights of way*" (NPPF para 105).	residual significant adverse effect to the CNL as a tourism destination.
SLD-116	Socio-Economics, Tourism and Recreation	Recreational and Residential Amenity	2.10.5 The Applicant is forced to accept the harm that it would do to a large number of PRoWs. In [APP-068] at para 16.10.31 the Applicant accepts there are significant effects on 7 PRoWs and effects on 120. However, SLD consider that this fails to engage with the harmful effect of even the mitigations proposed by the Applicant (which essentially result in long, enclosed and inescapable corridors, with once-open views lost to mitigation such as vegetation).	The Applicant has aimed to provide a robust assessment of impacts to PROWs in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** and its supporting **ES Volume 3 Appendix 16-2 Tourism and Recreation Receptor Tables [APP-241].** The assessment of user experience and desirability during the operational phase of the Scheme takes into account all aspects of the Scheme design, including views of Solar PV Sites, landscape mitigation, and any change to PRoW character, improvement to user experience as a result of ecological mitigation planting on field boundaries, and increased access between PROWs as a result of proposed permissive paths.

SLD-117	Socio-Economics, Tourism and Recreation	Recreational and Residential Amenity	2.10.6 The Applicant asserts that, overall, the effects are medium-term temporary minor adverse. However, this fails to recognise (1) the permanent effect of dissuading tourists from the area, including those visiting the CNL; (2) the permanent effect of discouraging local people accessing the countryside, including visiting the CNL; (3) the permanent effect of any mitigation that is left in place; and, (4) the falling into disuse and disrepair of PRoWs which are significantly harmed by the Scheme. Again, given the policy imperatives to *"protect and enhance public rights of way"* (NPPF para 105), this should weigh against the Scheme.	The Applicant is confident that the assessment undertaken in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** and its supporting **ES Volume 3 Appendix 16-2 Tourism and Recreation Receptor Tables [APP-241]**, is robust and considers the likely significance of effect to recreation receptors at all phases of the Scheme. Construction phase impacts are assessed as medium-term temporary effects as they are anticipated to last approximately 2 years, whereas long-term effects are those anticipated for more than 5 years. Furthermore, the Applicant has assessed long-term effects on tourism and recreation receptors under the assessment of operational phase effects based on the **Design Principles And Parameters [APP-269]** of the Scheme, the indicative design set out in **ES Volume 2, Landscape and Ecological Mitigation Plans [APP-084]**. The protection and maintenance of PROWs throughout the operational lifetime of the Scheme is secured by the **OPROWPPMP [APP-282]** by Requirement 16 in Schedule 2 to the **Draft DCO [APP-016]**. This therefore ensures that the Applicant is responsible for maintaining PROWs within the Scheme to a good state of repair regardless of any change to the level of patronage or use of those routes.

SLD-118	Socio-Economics, Tourism and Recreation	Recreational and Residential Amenity	2.10.7 This is also before recognising the cross-cutting effects that arise in respect of PRoWs. Among other things, there is the use by construction vehicles; amplification of use; glint and glare; and noise (to name but a few considerations). SLD considers that the Applicant has significantly and demonstrably underweighted the harm to PRoWs in the site area.	The assessment of impacts on PRoW in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** and its supporting **ES Volume 3 Appendix 16-2 Tourism and Recreation Receptor Tables [APP-241]**, considers the inter-dependent effects from direct physical impacts such as construction traffic, and indirect or experiential changes, such as visual amenity and noise impacts. All of these factors have been considered in the determination of the likely impact to PRoW users, and the mitigation measures required to ensure significant adverse effects are minimised. The Applicant is confident that this approach has been methodologically robust and proportionate, and the assessment outcomes are as accurate as able to be at this stage. The **oPRoWPPMP [APP-282**] provides measures to manage the PRoW network affected by the temporary construction period. The decommissioning phase is also temporary with similar effects as the construction period. During operation, the Scheme would generate a low level of vehicle trips with negligible impact A final PRoWPPMP would be prepared post consent and must be substantially in accordance with the **oPRoWPPMP [APP-282]** and approved by the relevant local planning authorities (in consultation with the relevant highway authorities), as secured by Requirement 16 in Schedule 2 of the **Draft DCO [APP-016]**.

SLD-119	Other Environmental Matters	BESS Safety and Air Quality	2.11.1 The BESS proposed for the Scheme is extremely large; proposed at 500MW and 1000MWh capacity. It is well known that BESS thermal runaway events, or "*fires*", can release a wide range of toxic gases. [APP-067] includes a model assessment of the likely concentrations and effects of a BESS fire at Lime Down. This purports to show that emissions from a fire in the BESS would have negligible effects on human health even at the closest receptors. SLD consider that the methodology used in this study is seriously flawed and misleading, and that health effects are likely to be significant. 2.11.2 Among the flaws in the study are: •Failure to use a credible worst-case scenario. • Restriction of the study area to 1 km distance from the fire. • Use of inappropriate environmental standards. • Failure to model pollutant concentrations at the closest receptors, including the main line railway. • Failure to model some of the most toxic pollutants. • Underestimation of emission rates from the fire.	The BESS fire emissions assessment (as detailed in **ES Volume 3, Appendix 15-2: BESS Fire Emissions Modelling [APP-239]**) has been undertaken using professional judgement in the absence of specific regulatory guidance, and adopts a conservative, worst case approach throughout. The assessment demonstrates that, even under worst case assumptions, a BESS fire would not result in significant effects on human health or safety. Additionally, detailed modelling would be undertaken at the detailed design stage to inform the Emergency Response Plan, in accordance with the **Outline Battery Safety Management Plan (BSMP) [APP-286]**, ensuring that any refinements to layout or technology are fully accounted for. The Applicant has addressed the bullet points in 2.11.2 below. <u>Failure to use a credible worst-case scenario</u> The assessment adopts a conservative worst-case approach throughout. A potential fire is modelled as a steady burn resulting from thermal runaway within a single BESS container, which is considered to represent a credible worst case given the compartmentalised nature of modern BESS design and the multiple layers of protection that would be provided, as described in the **Outline BSMP [APP-286]**. The modelling assumes: • Worst case BESS fire locations within the BESS area closest to sensitive receptors; • Worst case release height, temperature and plume parameters; and

				• Use of five years of hourly meteorological data, with the maximum predicted concentration extracted at each receptor, assuming the fire coincides with the poorest dispersion conditions. Given the inherent uncertainty in available BESS fire emissions data, a sensitivity test was also undertaken whereby emission rates were doubled. Even under this highly conservative sensitivity test, predicted concentrations remained well below the relevant health-based thresholds. <u>Restriction of the study area to 1 km distance from the fire</u> A 1 km study area was selected based on professional judgement and precedent from similar schemes, including published assessments for comparable BESS developments. This is in line with the latest National Fire Chiefs Council guidance 'Grid scale energy storage system planning - Guidance for fire and rescue services' (2025). Within this study area, worst case receptors where public exposure could reasonably occur have been modelled, including residential properties, public rights of way and transport corridors. The modelling demonstrates that concentrations reduce rapidly with distance, and beyond 1 km, the effects would be negligible due to atmospheric dispersion and dilution. <u>Use of inappropriate environmental standards</u> The use of Acute Exposure Guidance Levels (AEGLs) is considered appropriate and robust for assessing short duration accidental fire events. AEGLs are internationally recognised, health-based

				thresholds specifically developed for emergency response and short-term exposure scenarios and are therefore more relevant than long term ambient air quality objectives, which are not designed for accidental, acute releases. Where AEGLs were not available, the Health and Safety Executive Workplace Exposure Limit (WEL) for respirable dust has been used as a conservative surrogate for particulates. For carbon monoxide, the World Health Organisation 1 hour guideline has been used in the absence of an AEGL 1 threshold. This approach is more precautionary than using national air quality objectives and is consistent with Environment Agency guidance for releases to air. Failure to model pollutant concentrations at the closest receptors, including the main line railway The assessment models concentrations at the closest relevant receptors. Human health receptors included in the assessment include residential properties and public rights of way located closest to the BESS area. In addition, worst case locations on the local road and rail network have been included for the visibility assessment, and corresponding PM_{10} concentrations have been modelled at these locations. The mainline railway is therefore considered in the assessment, and results demonstrate that predicted pollutant concentrations and visibility impacts would remain well within safe limits, even under conservative assumptions. Failure to model some of the most toxic pollutants

				The assessment includes all major toxic pollutants typically associated with BESS fires for which credible emissions data are available, including carbon monoxide, formaldehyde, hydrogen chloride, hydrogen cyanide, hydrogen fluoride, ammonia, nitrogen dioxide and particulate matter. The selection of pollutants was informed by BESS fire test data and expert advice from the Applicant's battery safety consultants. Where emissions data were limited or unavailable, conservative assumptions have been applied and uncertainty has been addressed through sensitivity testing. <u>Underestimation of emission rates from the fire</u> Emission rates were derived using BESS fire test data. A preliminary emission rate was applied and then back calculated using measured concentrations from BESS fire tests, ensuring the model reproduced real world test data. To address uncertainty, emission rates were doubled in a sensitivity test. Even under this scenario, predicted concentrations remained well below AEGL 1 thresholds and other relevant health-based criteria at all modelled receptors.
SLD-120	Hydrology Flood Risk and Drainage	Groundwater Contamination	2.12.1 Chapter 29 [APP-071] of the ES addresses ground conditions and contamination. SLD consider the possibility of groundwater contamination to be a significant issue. Notwithstanding the measures set out in the ES by the Applicant, SLD remain concerned that the Scheme presents an unacceptable risk of groundwater pollution, which the Applicant's high-level assessment does not properly consider, and the proposed	An assessment of ground conditions, including potential contamination risks and pathways to groundwater, is provided in **ES Volume 1, Chapter 19: Ground Conditions [APP-071]**, supported by the Preliminary Risk Assessments contained in **ES Volume 3, Appendices 19 1 to 19 9 [APP 247 to APP 255]**. These documents consider potential sources of contamination, groundwater sensitivity

			mitigation measures do not properly address.	and plausible pathways to controlled waters. Further ground investigation prior to the commencement of construction is secured through the **Outline Construction Environmental Management Plan (CEMP) [APP-277]** and will apply to all parts of the Scheme. This provides the mechanism for verifying ground conditions and refining the understanding of groundwater risks prior to construction activities taking place. The management of contamination risks during construction is governed by the **Outline CEMP [APP-277],** which includes a Discovery and Inspection Strategy. This ensures that any unexpected contamination encountered is assessed and managed appropriately, including consideration of risks to groundwater, using a proportionate and risk based approach rather than prescribing a single remediation method. The measures set out within the **Outline CEMP [APP-277]** are secured by Requirement 13 in Schedule 2 of the **Draft Development Consent Order [APP-016],** which requires a detailed CEMP to be submitted to and approved by the relevant planning authority prior to construction, to be substantially in accordance with the Outline CEMP, and for construction works to be carried out in accordance with the approved CEMP.

SLD-121	Hydrology Flood Risk and Drainage	Hydrological Risk Assessment	2.12.2 The entire Site is within a Groundwater Source Protection Zone, as designated by the Environment Agency. This recognises the special importance of groundwater as a valuable resource to this region. There are two rock formations which supply water (aquifers) in the area – the Great Oolite (or Chalfield Oolite), and below it, separated by an impermeable layer of Fullers Earth, the Inferior Oolite. It should be noted that a significant portion of the groundwater within the Site boundaries is used as drinking water in the local towns and villages (including through boreholes) and extracted by Wessex Water for use in Chippenham and Bath. There is also capacity for some of this water to be transferred in the future to the adjacent Thames Region. As a Source Protection Zone, development at the Site Lime Down should be constrained where it puts these valuable water resources at risk. That is also true when several properties locally use bore holes for water supply. 2.12.3 The *"high-level"* assessment of hydrogeological risks carried out by the Applicant is inadequate. The Applicant has carried out a variety of "*Desk Studies*" but the assessment of hydrogeological risk is merely a small proportion of it. A conceptual model has been prepared based on a source-pathway-receptor formulation but omits many of the major contaminants identified in the ES as potentially problematic. The model erroneously focusses on minor sources, such as backfilled ponds. As a consequence, the risks are underplayed. 2.12.4 The sensitivities of the Site	The applicant regards the assessments presented in **ES Volume 1, Chapter 19 [APP-071]** and the associated Preliminary Risk Assessments **[APP-247 to APP-255]** as appropriate for the scheme and the identified sources of historic contamination. This is based upon the information available at the time of undertaking the assessment. The above documents have been reviewed prior to Examination Deadline A and where necessary, adjustments have been made to clarify or amend the assessments. Construction and Operational risks are considered in **ES Volume 1, Chapter 19 Ground Conditions [APP-071]** and where deemed to require mitigation, that mitigation is secured via the **Outline Construction Environmental Management Plan (CEMP) [APP-277]** and the **Outline Operational Environmental Management Plan (OEMP) [APP-278].** In relation to hydrological changes affecting ancient woodland, the assessment in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [APP-063]** addresses surface water drainage and runoff mechanisms. The Scheme maintains existing surface water drainage pathways and does not result in material changes to surface water infiltration or groundwater recharge. Groundwater level effects and aquifer interactions are addressed separately in the ground conditions assessment. Ground investigation and verification of ground conditions prior to construction is secured through the **Outline Construction Environmental**

			indicate that a detailed Hydrogeological Risk Assessment should have been carried out by the Applicant. The ES suggests no detailed assessment was necessary given *"the limited intrusive groundworks proposed, the underlying geological and the mitigation and control measures set out in the Outline CEMP."* However: • The ground works proposed along the CRC are clearly intrusive. • The Site is located in close proximity to a variety of sensitive groundwater receptors. For example, there are several aquifers in the district. The Great Oolite is the main one used for water supply and is classified by the EA as a *"principal aquifer"*, the most important type. • The Site is located within a Source Protection Zone, which would ordinarily necessitate such a detailed assessment. • The Environment Agency classifies the whole area as *"vulnerable"* to groundwater pollution, with the exception of Area E. Most of the Lime Down Site is overlain by the Forest Marble, a "*secondary A"* aquifer. • The maximum depth of piling proposed is 12 meters ([APP-055] at pp.9-10, for substations). This has the prospect of breaking through protective layers covering the major aquifer, leading to contamination from surface pollution, whether due to the Scheme or not. • The sites are very close to some ancient woodlands. Given the hydrological changes that panel areas would bring, this could affect growing	**Management Plan (CEMP) [APP 277]**. The Outline CEMP provides the mechanism through which risks associated with risks to sensitive groundwater resources. In addition, separate **BESS and Substation - Geotechnical Risk Register Cable Route** and **Avoidance Areas - Geotechnical Risk Register [Doc REF tbc]** are being developed for piling and HDD works and will be submitted at Deadline 1. These documents will identify location specific risks to groundwater, where activities occur at greater depths and to inform appropriate management measures prior to construction. Where required, mitigation may include alternative foundation solutions or adjustments to cable installation techniques and pile design to reduce potential risks to groundwater and contaminated land.

			conditions and lead to changes in species composition or even death of trees.	
SLD-122	Hydrology Flood Risk and Drainage	Groundwater Contamination	2.12.5 Mitigation is discussed in the CEMP and is insufficiently tailored to the Site. The plan lacks detail and consists mostly of references to standard operating procedures, showing no awareness of the unusual features of the area which may render some of the measures ineffective. Only the collection of firefighting water for the BESS has a site-specific plan.	In relation to surface water drainage controls and firefighting water management for BESS, construction-phase pollution prevention and runoff controls are secured through the **Outline Construction Environmental Management Plan (Outline CEMP) [APP-277]**, with detailed measures approved through Requirement 13 in the **Draft DCO [APP-016].** Site-specific controls for firefighting water collection and containment at the BESS are set out in the **Outline Battery Safety Management Plan [APP-286],** which establishes the principle of sealed and isolatable drainage and the management of any retained firewater to avoid pollution of surface water and groundwater. Broader controls relating to ground conditions and potential contamination pathways are addressed through the ground conditions assessment in **ES Volume 1, Chapter 19 Ground Conditions [APP-606].** No amendments to the application documents are required.

SLD-123	Hydrology Flood Risk and Drainage	Groundwater Contamination	2.12.6 Groundwater contamination is also considered in Chapter 11, Hydrology, Flood risk and Drainage [APP-063]. However, the assessments in Chapter 11 do not include all the major issues raised by Chapter 19 [APP-071] and are still based only on qualitative opinion. The requirement for a full hydrogeological risk assessment requested by the Planning Inspectorate (Scoping Report ID 3.5.11), the Environment Agency (Scoping Report p.112-137) and Wessex Water (Scoping Report p.298-301) has been ignored.	The Applicant notes the representation and confirms that potential effects on groundwater are addressed primarily **ES Volume 1, Chapter 19: Ground Conditions [APP-071],** which provides the detailed assessment of soil and groundwater contamination, hydrogeological sensitivity, construction risks and mitigation measures. **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [APP-063]** considers groundwater only insofar as it relates to surface-water interactions and flood risk, consistent with its scope, and therefore does not duplicate the full ground-conditions assessment in **ES Volume 1, Chapter 19: Ground Conditions [APP-071]**. Together, the chapters provide a complete assessment of potential groundwater risks. Additional pre-construction ground investigation is secured via **Section 3 of Outline Construction Environmental Management Plan [APP-277]** in order to confirm the conceptual site model and identify the presence of any contamination. Where contamination is identified, risk assessment would be undertaken in line with the process outlined in the Uk Government guidance *"Land Contamination: Risk Management"* which would be appropriate to the identified source-pathway-receptor linkage. Appropriate mitigation would then be deployed in order to ensure that risks to receptors posed by any contamination are acceptable.

SLD-124	Other Environmental Matters	BESS Safety and Location	2.13.1 A significant concern for the community living around the Scheme is the proposal for a 1GWh BESS. This BESS is already in a sensitive location, proximate to the Grade 1 listed Bradfield Manor, also Hullavington, Norton, and some more isolated dwellings. Concerningly, the BESS is also situated next to major infrastructure: the railway. BESSs are a significant and well-known fire risk, and SLD considers that the siting and size of the proposed BESS has failed properly to engage with safety constraints. Given the environmental impacts of the BESS, and the uses of the BESS proposed (see in the next section below), SLD consider the justification and all effects of the BESS should be considered in detail.	The location of the BESS was determined through an options appraisal and iterative design process, having regard to technical requirements, environmental constraints and potential effects on nearby receptors. The BESS Area is located at Lime Down D, close to the Solar PV Sites and the on-site substation, which provides operational and efficiency benefits, including minimising transmission losses, maximising storage efficiency, supporting grid balancing, and enabling a rapid and reliable response to network fluctuations. Among the options considered for co-locating the BESS with the Solar PV Sites, Lime Down D was identified as the preferred location due to its central position within the Scheme, the presence of existing and proposed screening, its limited proximity to many residential properties, and its relationship with existing infrastructure, including the adjacent railway line. The **ES [APP-052 to APP-265]** assesses the likely significant effects arising from the BESS at this location and identifies mitigation measures where necessary. Overall, the assessment concludes that the siting of the BESS at Lime Down D presents the lowest potential for significant adverse effects when compared with reasonable alternatives. Further detail on the consideration of alternatives, the design evolution of the Scheme and the assessment of potential effects is provided in **ES Volume 1, Chapter 4: Alternatives and Design**

				Evolution [APP-056], which sets out the iterative process undertaken to identify the preferred location and layout for the Scheme, including the BESS Area in Section 4.7. The Applicant has followed National Fire Chiefs Council (NFCC) guidance and commissioned a Plume Assessment Study to model toxic gas emissions and visibility impacts from a BESS fire on all sensitive receptors within a 1km radius of the BESS area. The fire emissions modelled in the report were based upon recent UK Health Security Agency (UKHSA) requests for DCO BESS projects which explore both immediate air quality impacts together with annual UK air quality requirements. The UKHSA is a statutory consultee for the Scheme and has confirmed that they are satisfied with the Applicant's submitted documentation and Plume Assessment Study. The UKHSA has confirmed that the Scheme should not result in any significant adverse impact on public health **[RR-4798]**. Six worst case BESS fire locations (i.e. locations within the BESS Area closest to sensitive receptors) have been modelled as depicted in **ES Volume 2, Figure 15-5: Battery Energy Storage System Fire Emissions Study Area [APP-166]**. The Concentrations of carbon monoxide (CO), formaldehyde, hydrogen chloride (HCl), hydrogen cyanide (HCN), hydrogen fluoride (HF), ammonia (NH_3), nitrogen dioxide (NO2) and particulates from a potential BESS fire have been modelled using an air quality dispersion model to

				determine the likely effects on human health. A high-level visibility assessment has also been undertaken using the modelled particulates results to determine the effect of BESS fire emissions on visibility on the local road and rail network to inform the **Outline Battery Safety Management Plan (OBSMP) [APP-286].** The Plume Assessment Study has concluded that there are no significant toxic emission or visibility impacts at all sensitive receptor locations. The Applicant has also committed to commissioning an additional Plume Analysis Study at the detailed design stage as stipulated in Section 5.5.9 of the OBSMP and secured through the DCO: "*..at the detailed design stage a BESS system and site specific Plume Analysis study will be conducted to assess the environmental impact of a site incident to sensitive receptors within a 1 km radius. Toxic gas emissions to sensitive receptors must be below relevant public health exposure limit guidelines when the battery system of a BESS is fully consumed (burnt out), production of Particulate Matter (PM) and a visibility impact assessment on any transport links within a 1 km radius of the BESS area will also be included. The ERP produced at the detailed design stage (template outlined in Section 5.4.4) will incorporate all necessary emergency response procedures and actions based upon thermal runaway test data supplied by the BESS system provider.*" As now mandated under NFPA 855 (2026), the Applicant will only be able to

				select a BESS system that has undertaken Large Scale Fire Testing (LSFT). At the detailed design stage, the selected BESS LSFT data will be leveraged to fully inform inputs for risk assessment tools which will be utilised together with detailed consequence modelling to provide a comprehensive site operations and emergency response safety audit, this is stipulated in the OBSMP pre-construction requirements (Section 6). The **OBSMP [APP-286]** has been prepared for the Scheme using guidance from Dorset and Wiltshire Fire and Rescue Service and incorporating recommendations of the National Fire Chiefs Council. The safety objectives for the design of the BESS site are listed in Section 2.4 of the OBSMP. The OBSMP will be amended at Deadline 1 to fully accommodate the latest BESS safety requirements contained in NFPA 855 (2026) ensuring that any credible risks associated with battery storage are either prevented or fully mitigated if a BESS failure occurs. Section 2.4.2 of the OBSMP stipulates that: *"Final BESS design and site layout will have been validated through mandatory Large Scale Fire Testing (LSFT) and rigorous consequence modelling to minimise the requirement for any D&WFRS intervention in a thermal runaway incident. LSFT must establish minimum equipment spacing distances that demonstrate there is no fire propagation to adjacent BESS enclosures or ESS equipment. D&WFRS intervention in worst case scenarios would typically be*

				limited to boundary cooling of adjacent BESS and Energy Storage System (ESS) units to prevent the fire from spreading. This strategy will be finalised with D&WFRS and be clearly communicated in the Emergency Response Plan (ERP); *• To ensure that fire, smoke, and any release of toxic gases does not significantly impact site operatives, first responders, and the local community; and* *• To ensure that firewater run-off is contained and tested before release or, if necessary, removed by tanker and treated offsite."* As set out in the **Outline Battery Safety Management Plan [APP-286]**, the BESS Area will have a robust and validated Emergency Response Plan (ERP), developed in consultation with Dorset & Wiltshire Fire and Rescue Service at the detailed design stage. Section 5.4 of the OBSMP specifies the typical emergency response protocols, procedures and safety information that will be included in ERPs. ERPs will be drafted and approved for all stages of the Scheme, including construction, operation and decommissioning. The Applicant's ERP template includes all requirements specified in both NFCC and NFPA 855 guidance and recommendations. Section 5 of the OBSMP covers all requisite firefighting requirements for the Scheme including fire service access, firefighting water supply, and emergency planning requirements. The Applicant is currently drafting a Statement of Common Ground (SOCG) with the Environment Agency (EA) on Scheme environmental protection issues

				including the BESS area drainage strategy. The agreed strategy document will be appended to the OBSMP at Deadline 1, to provide further assurance that all water pollution risks from a BESS fire are fully mitigated. The EA is a statutory consultee for the OBSMP and drainage strategies and must approve the final BSMP and drainage design at detailed design before construction of the BESS commences. The **OBSMP [APP-286]** is secured through Requirement 6 (Battery safety management) in Schedule 2 of the **Draft DCO [APP-016],** which provides that Work No. 2 must not commence until a Battery Safety Management Plan has been submitted to and approved by the relevant planning authority. The approved plan must be substantially in accordance with the Outline Battery Safety Management Plan. The Draft DCO also requires the relevant planning authority to consult with Dorset and Wiltshire Fire and Rescue Service and the Environment Agency before determining the application, and that the Battery Safety Management Plan must be implemented as approved.
SLD-125	Other Environmental Matters	BESS Safety and Groundwater Contamination	2.13.2 SLD also consider that the existing Outline Battery Safety Management Plan ("OBSMP") [APP-286] cannot currently give the ExA the comfort required that it would address the full scope of a BESS fire event with a development of this magnitude. That is particularly so given the lack of detail about the BESS technology itself; without such information, there can be no confidence that a reasonable worst-case	An assessment of potential contamination risks is provided in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [APP-063]** and **ES Volume 1, Chapter 19: Ground Conditions [APP-071],** which consider risks to surface water, groundwater and sensitive receptors during construction, operation and decommissioning of the Scheme. These assessments conclude that, with appropriate mitigation and management

			situation has been assessed and (importantly) whether the OBSMP can respond to all such worst cases. 2.13.3 SLD have concerns that the Applicant has not properly assessed the consequential effects of a BESS fire in the reasonable worst-case scenario. To take one example, [APP-063] provides very limited detail on mitigating the reasonable worst-case scenario for polluted water discharge arising from attempts to extinguish a battery fire. As the report correctly notes, the area is a Source Protection Zone, and so sensitivity of groundwater receptors is high (para 11.10.49). Given the possible toxicity of such water SLD considers this is a particularly sensitive issue. Yet there is only a description of mitigation at a very high level without detail of what the reasonable worst-case is (for example, does it account for additional water brought to site, does it account for a fire with significant container to container propagation?). 2.13.4 The ES is required to assess the likely significant effects of the Scheme. If the Applicant proposes to rely on such mitigation to avoid those significant effects, SLD consider that a clear analysis demonstrating the reasonable worst-case scenario, and a quantification of how the measures in the OBSMP and associated documents (including on proposed measures for drainage), need to be put before the ExA.	measures in place, no significant contamination effects are anticipated. The Applicant notes that the approach to risk of contamination of groundwater and surface water has been agreed with Wiltshire Council and is under discussion with the Environment Agency. This is set out in the relevant Statement of Common Ground with Wiltshire and will be included in a future Statement of Common Ground with the Environment Agency due to be submitted at Deadline One (1 May). Mitigation and management measures to protect water and ground conditions from contamination from a BESS incident are set out in the **Outline CEMP [APP-277] and Outline BSMP [APP-286].** These include pollution prevention controls, containment measures, emergency response procedures, and site-specific drainage design. The Outline BSMP specifically provides for fully contained BESS drainage systems designed to prevent any release of contaminated firewater or spills to the wider environment, including lined drainage and automatically actuating shut-off valves to contain any accidental spills or firewater, preventing release to surrounding land or watercourses. These embedded measures are explicitly designed to protect sensitive receptors, including the SPZ identified in the ES, by preventing infiltration or runoff that could otherwise reach groundwater. In combination, drainage within substation and BESS areas is therefore fully contained, preventing any accidental spills or firewater from reaching

				surrounding land, watercourses, or groundwater. The preparation, approval and implementation of the detailed CEMP and BSMP, substantially in accordance with their respective outline versions, are secured through Requirements 13 and 6 in Schedule 2 of the **Draft Development Consent Order [APP-016],** ensuring that contamination risks are appropriately controlled throughout construction and operation of the Scheme. Among the options considered for co-locating the BESS with the Solar PV Sites, Lime Down D was identified as the preferred location due to its central position within the Scheme, the presence of existing and proposed screening, its limited proximity to many residential properties, and its relationship with existing infrastructure, including the adjacent railway line.

SLD-126	Ecology and Biodiversity	Overplanting	2.14.1 SLD accepts that the NPSs set out an in-principle case for solar energy generation in the UK. Indeed, it supports such generation in the right locations. However, there are key features of large-scale solar, and this scheme in particular, which it considers to be critical to properly assessing the effects and benefits of this scheme. 2.14.2 First, the Applicant's Statement of Need states that the Scheme "*does not propose significant overplanting*" ([APP-266], para 6.6.3), but gives no indication of the reasonable worst-case of any scope for overplanting at all. Given the significant environmental effects of overplanting, the Applicant must justify on the facts of this case (rather than an abstract explanation) the reasonable worst-case approach to overplanting. If there is in fact limited or no overplanting, this should be secured in the DCO.	The amount of any overplanting will be dependent on the final detailed design and generating capacity and efficiency of the panels utilised for the Scheme. For the reasons set out in paragraphs 1.4.3 and 1.4.4 of the **Explanatory Memorandum [APP-017]**, the description of the NSIP at Work No. 1 does not refer to an upper limit on the capacity of the generating station that development consent is being sought for. It is not considered that imposing an upper limit on generation capacity or overplanting is desirable or necessary. The DCO includes reference to the means by which the parameters of the Scheme will be constrained and it is on this basis that the Environmental Impact Assessment has been undertaken, as set out in the **ES [APP-052 to APP-265]**. There is no reason to limit the electrical output capacity of the Scheme provided those parameters of the consent envelope are adequately captured in the DCO. The Applicant is confident that those parameters are adequately secured in the DCO, including the spatial extent of the location of solar panels within the areas shown on the **Works Plan [APP-007].** There are clear advantages in not imposing an upper limit on capacity. For example, the Applicant may take advantage of technological improvements and innovation that may emerge before construction, which would enable it to still construct the Scheme within the assessed parameters but increase capacity beyond that which is currently anticipated. It is in the public interest and

				accords with national policy to facilitate efficient and maximum generation from renewable sources, which is explained further in the **Statement of Need [APP-266]**. The approach taken has precedent in all of the made Orders for solar NSIPs to date.

SLD-127	Site Selection and Alternatives	Distance of Cable Route	2.14.3 Second, the Scheme is understood to be unusual in requiring a 22km 400kV grid connection cable (para 3.1.4 of [APP-270]). SLD understands from the site selection process that this is not the Applicant's preferred distance. Such a cable and associated works is costly and increases the quantum of environmental effects for no additional benefit. This makes choosing this location surprising, and increases the difficulty of justifying the many environmental effects set out in this RR. However, this distance also causes transmission losses, but no independent assessment of that loss has been made. Rather a "*Round Trip Efficiency*" ("RTE") figure is given via the BESS which is addressed below.	The Applicant confirms that the existing National Grid Melksham substation has been identified as the point of connection. This decision was based on available capacity, network resilience, and strategic grid planning. As explained in **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]**, an initial search area was identified at a 5 km radius from the POC, however this was later expanded as no suitable and available sites within 5 km were identified. The search area was enlarged incrementally to a 20 km radius which is considered by the Applicant to be a viable cable connection distance for a solar project of this scale. The POC and 20 km search area is shown on Figure 1, Annex C of **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]**. Further, from an operational perspective, high voltage electricity transmission at 400kV in this case, is specifically designed to minimise energy losses over long distances. As such, the approximate 20km distance involved results in negligible losses. More details on how the Cable Route Corridor has been located and designed can be found in **ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP-056]**. Several factors were considered such as taking as direct a route as possible, whilst following existing features, such as roads; and avoiding sensitive receptors as far as practicable, such as habitat designations, residential

				and commercial properties, heritage assets, and a large number of land interests. The assessments set out in the various chapters of the **ES [APP-052 to APP-265]** detail what impacts are expected as a result of the Scheme based on the minimum and maximum parameters of the Scheme, and the mitigation and enhancement measures that are proposed to reduce these impacts.

SLD-128	Description and DCO Process	BESS Capacity and Efficiency	2.14.4 Third, the Applicant quite clearly intends to benefit commercially by trading BESS capacity and importing from the National Grid. The Scheme itself is proposed to have an import capacity of 250MW. The Applicant recognises "*[n]either are BESS 100% efficient"*, and suggests a RTE of power generated in the Scheme and used to charge the BESS before discharge of 88% ([APP-270], para 5.11.63) or 85% ([APP-059, para 7.10.66). That is a significant loss, any may well encourage further generation by high emission generating stations elsewhere on the grid.	The Applicant notes the comment and confirms that the technical role of the Battery Energy Storage System (BESS) is to provide the National Grid Transmission Network with essential flexibility and a reliable source of electricity by storing, then distributing surplus electricity as and when needed. The Scheme is specifically designed with the optionality to charge from both the on-site Solar PV Arrays and the National Grid. This allows the BESS to store excess renewable energy during periods of high generation from the Solar PV Sites or import energy from the grid when demand is lower than supply, subsequently exporting it when demand is higher. As highlighted in National Policy Statement EN-1, BESS technology is critical for providing the flexibility required to integrate low carbon power onto the network. The Applicant confirms that any commercial and trading elements associated with BESS are an industry norm and ensure the Scheme delivers this vital support to the National Grid Transmission Network. Regarding efficiency, the Applicant maintains that lithium-ion technology is an industry standard for utility-scale storage due to its proven performance and efficiency. While the expected Round Trip Efficiency (RTE) of 85 to 88% reflects standard conversion and storage parameters, these should be viewed in the context of the overall efficiency of the Scheme and the national network. The Scheme's delivery to the National Grid at a high voltage of 400kV is specifically designed to minimise losses over long

				distances, resulting in negligible power loss overall.
SLD-129	Description and DCO Process	Cable Lifespan	2.14.5 At least currently, it is unclear whether the 22km cable would survive the 60-year lifespan of the Scheme. While the Applicant considers that replacement of the high voltage cables is "*not anticipated*" ([APP-059], para 7.4.19), at least one paper (produced by Scottish and Southern Electricity Networks) states that "*underground cable would be expected to have an operational life of around 40 years*".	An anticipated 60-year lifespan of Grid Connection and Interconnecting Cables is deemed to be an industry standard across several nationally significant solar infrastructure projects and has been confirmed by the Applicant through early engagement with their supply chain. The environmental assessment has included consideration of the replacement of specific components as set out within **ES Volume 1, Chapter 3: The Scheme [APP-055].**

SLD-130	Socio-economics, Tourism and Recreation	Tourism	2.15.1 Chapter 16 of the ES deals with Socio-Economics, Tourism and Recreation [APP-068]. The chapter considers impacts to the visitor economy across the construction, operation and decommissioning phases. 2.15.2 The ES appears to recognise the harmful impact of the Scheme in some respects. For example, the ES acknowledges that the Scheme's construction is likely to impact upon the visual amenity of visitor attractions and outdoor recreational facilities where there are line-of-sight visual changes to their surroundings, particularly where their landscape and visual context is important to their desirability, such as regionally important heritage locations or recreational routes. It is accepted that those effects have the potential to be significant. It is also acknowledged that the impacts on the agricultural and tourism sectors are anticipated to be continuous through the operational lifetime of the Scheme. 2.15.3 Evidently, the landscape is an important part of the tourism offer in this area and, as such, any changes to the natural landscape could impact significantly on its appeal. Likewise, walking, horse-riding, and cycling are popular tourist activities in the locale and would be impacted by those landscape harms by virtue of the diminished and industrialised character of the area post-development. SLD will present further evidence in its written representations on the potential of the Scheme to harm the local economy.	The Applicant provided a robust assessment of socio-economic impacts in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068].** As such, this identified where adverse effects are likely to occur, such as to agricultural and tourism-based industries, but also beneficial socio-economic effects, particularly during construction, where large-scale albeit temporary employment opportunities are available, and long-term financial security to owner-occupier agricultural businesses and landowners benefitting from ground rent from the Scheme. Where losses to agriculture and tourism have been identified, these are worst-case estimates based on likely significant effects from the Scheme. Additional mitigation measures through **the Outline Skills, Supply Chain and Employment Plan (OSSCEP) [APP-285]** seek to reduce these losses through focusing on local recruitment, promoting local suppliers where practicable, and through providing retention and retraining opportunities for workers in agriculture or tourism-dependent industries. It is considered that these measures would help to reduce local losses in the local economy, and help to generate additional GVA in the local economy in alternative industries. The **OSSCEP [APP-285]** is secured by Requirement 18 in Schedule 2 to the **Draft DCO [APP-016]**.

SLD-131	Climate Change and Energy Need	Climate Assessments	2.16.1 SLD has commissioned an academic review of the Applicant's Climate Change and GHG assessment [APP-059]. SLD has concerns that the Climate Change Chapter of the ES substantially overestimates the benefits of the Scheme and underestimates embedded carbon. 2.16.2 The embedded carbon of the Scheme is a choice of its design. While SLD accept the policy imperative in favour of solar generation, the positive weight to be ascribed to such development is necessarily tempered in the balance by the environmental effects of the Scheme. Given the apparent overestimate of the Scheme's climate change credentials, SLD consider that the benefits of the Scheme overall must weigh less heavily in the analysis overall. SLD will also comment on the significant change of GHG calculations from the PEIR, and concerns it has about the consistency of figures provided.	Wherever possible within the Climate Change chapter, conservative, worst case assumptions have been made for the purpose of calculating GHG emissions from embodied carbon within products and transport of materials. E.g. while it is not likely that all materials would come from China, the assessment has considered shipping emissions as if they would. It is not clear where SLD believes that there are any overestimations of the scheme's embodied carbon, but the applicant considers that the assessment is as robust as possible given the information available at the planning stage.
SLD-132	Climate Change and Energy Need	Climate Assessments	2.16.3 In addition, SLD consider that the ES does not assess all likely significant effects of the Scheme on the climate. As is noted above, the Applicant proposes to charge the BESS from the National Grid, with no indication of how often this would happen. Given this would be at times the solar is not itself charging the BESS (e.g. at night as considered at [APP-266], fig 22, at which time there is also less wind), there is a likelihood that this would be charging when the National Grid is at a high GHG emission intensity (as other solar would not be generating as well). That the Scheme may encourage CCCT	The energy stored in fossil fuels is converted to electrical energy when burnt. Market mechanisms ensure that conversion losses (e.g. from fossil fuels to electricity, or from storing and releasing electrical energy from BESS) are minimised at all times. For this reason, and as a general rule, high-GHG emission fuels will not be burnt to generate electricity which is then stored in BESS. Section 9.2 of the **Statement of Need [APP-266]** explains that the GB electricity market operates on a marginal cost basis and increasing generation from carbon-intensive sources increases

			or other generating stations to operate is a likely significant upstream environmental effect which SLD considers the Applicant has not assessed for its ES.	market price, increasing the incentive to reduce electricity demand at that time, and therefore reducing the need to store it. Conversely, BESS will store predominantly low-carbon generation when otherwise it may be wasted; and export that energy to the grid when it is needed, thus causing a reduction in carbon intensive generation at that time.
SLD-133	Climate Change and Energy Need	Vehicle Emissions	2.16.4 It does not appear that the Applicant has considered using low emission mobile plant, which could be secured in the DCO (NPS EN1 para 5.7.9).	The commitment to minimise vehicle and plant emissions during the construction phase is set out within Tables 1 and 9 of the **Outline Construction Environmental Management Plan (CEMP) [APP-277]**. The preparation, approval and implementation of the detailed CEMP, substantially in accordance with the outline CEMP, is secured through requirement 13 in Schedule 2 of **the Draft Development Consent Order [APP-016]**.
SLD-134	Climate Change and Energy Need	Mitigation	2.16.5 SLD also consider that the measures proposed for mitigating emissions during the construction phase are ineffective. SLD consider that a legally-binding carbon limit for construction would be appropriate. For example, the Lower Thames Crossing Project (LTCP) contains a legally-binding carbon limit for construction, a first for any UK infrastructure project. It aims for a 70% reduction in construction emissions from the baseline, and aims to be fully zero-emission on sites by 2027 by eliminating all fossil and biofuels. The measures proposed would also reduce nitrogen oxides, particulates and other pollutants.	The Lower Thames Crossing project secures that contractors will be required to not exceed a carbon limit. That limit was initially set at 1.763 million tCO_2e, matching the worst-case scenario assessment of construction phase emissions. Following procurement tenders in which contractors demonstrated that they could achieve lower levels of carbon emissions, a lower limit was set of 1.44 million tCO_2e, to match what the contractors were confident they could achieve. In practice, the commitment only secures that the worst-case assessed in the Environmental Statement is not exceeded, with the reduction demonstrating how conservative that

				assessment was. LTC's Carbon and Energy Plan then sets out the measures for how the project could be constructed "*for the lowest practicable emissions*" below that maximum limit. In respect of the Scheme, the Applicant has also assessed the reasonable worst case GHG emissions arising from the construction phase under the Climate Change Chapter of the **ES [APP-059]** which are substantially lower than those projected for LTC (approximately 237,149 tCO2e as the worst case). The Applicant will implement all reasonably practicable measures to minimise GHG emissions during the construction phase, with mitigation committed and secured through the **Outline CEMP [APP-277]**. The Outline CEMP includes measures relating to plant selection, efficient construction practices, minimisation of fuel use, material optimisation, waste reduction and the use of low-carbon alternatives where feasible. Each of these measures contributes towards delivering a detailed design and construction programme that seeks to reduce emissions from the worst case assessment where practicable. These requirements will be translated into a detailed, enforceable CEMP under Requirement 13 of the **Draft DCO [APP-016].** The detailed CEMP must be substantially in accordance with the Outline CEMP, ensuring that construction-phase emissions are appropriately controlled. It is at this point in the detailed design process post DCO consent that more information on how emissions can be feasibly reduced can be identified and committed to, as was the

				approach with LTC. The process for discharging requirements is set out in Schedule 16 to the Draft DCO. Through that process the Applicant must confirm if any environmental effects are materially new or different to that assessed in the ES. The Applicant is therefore under an obligation to report on whether the measures set out in the detailed CEMP will result in construction emissions that are materially higher than those assessed in the ES. At this point it would be open to Wiltshire Council to request further information before discharging the Requirement, potentially resulting in delays to delivery of the Scheme and/or design changes being required, or to refuse to discharge the Requirement. The Applicant therefore does not consider that it is necessary to include a carbon limit for construction in the draft DCO and measures to reduce emissions are already secured.
SLD-135	Climate Change and Energy Need	Baseline Data	2.16.6 As to climate resilience, as noted above, baseline data was taken from the Met Office station at Yeovilton (68km distance from the centre of the Scheme). Contrary to [APP-059] para 7.7.8 there are 11 suitable measurement stations closer to the Scheme and all have higher rainfall than Yeovilton. SLD consider the rainfall figures used to thus be an underestimation, and has other concerns about the figures provided.	Yeovilton has been used within **ES Volume 1, Chapter 7: Climate Change [APP-059]** as a nearby met station with historic representative weather data in the format required for assessment as sourced from available Met Office data. This site was chosen as it has data available going back to 1964 to best establish the current baseline, though data from a 30year period (1991-2020) was used for the assessment. The data sites which are available can be viewed at https://www.metoffice.gov.uk/research/climate/maps-and-data/historic-station-data

SLD-136	Cumulative and in-combination effects	Cumulative Impacts	3.1.1 Many of the topic areas above address cumulative effects. However, SLD consider that the examination must address both intra-project cumulative effects (due to the islands of solar presenting as if separate schemes), and inter-project cumulative effects (with solar, BESS and other development, apparent in [APP-178] [APP-179] and [APP-264]).	A comprehensive Cumulative and In-Combination Effects Assessment has been undertaken in accordance with Planning Inspectorate Advice Note 17 and the relevant NPS EN-1, NPS EN-3 and NPS EN-5 requirements which are set out within **ES Volume 1, Chapter 21: Cumulative and In-Combination Effects [APP-074]** and associated **Appendices [APP-264].** Interaction with proposed or consented but not yet built developments has been fully explored within each of the technical assessments **[APP-059 - APP-072]** with a summary of each of these assessments provided within **ES Chapter 21 [APP-073].** Existing schemes are captured within the baseline environment. The four stage cumulative assessment methodology is described within **ES Volume 1, Chapter 6 EIA Methodology [APP-058].** 358 developments were included in the **Long List [APP-264].** 41 developments are included in the short list (and are therefore assessed) including a number of proposed solar and BESS developments. The list of developments included in the cumulative assessment was reviewed and developed in consultation with Wiltshire Council. Taking a conservative worse case approach, significant cumulative effects are identified at a limited and discrete number of receptors comprising tourism and recreation impacts during the construction phase on Corsham Park, PRoW WT|CORM|122, long path and Sustrans Cycle Route 403, and on skylark at a District level.

SLD-137	Cumulative and In-Combination Effects	Other Solar Projects in Vicinity	3.1.2 SLD is aware of numerous existing and recently approved developments in the area, including nearby existing solar. SLD consider it essential that Lime Down's interaction with other developments is fully examined, particularly as the surrounding and industrialising effect of this scheme is immediately apparent alongside these other schemes.	Interaction with other developments has been fully explored within each of the technical assessments **[APP-059 - APP-072]** with a summary of each of these assessments provided within **ES Volume 1, Chapter 21 In-Combination and Cumulative Effects [APP-073]**. Existing schemes are captured within the baseline environment. The methodology for identifying future proposed or consented schemes and undertaking the cumulative assessment is in accordance with Planning Inspectorate Advice Note 17 on Cumulative Effects. The four-stage methodology is described within **ES Volume 1, Chapter 6 EIA Methodology [APP-058].** 358 developments were included in the **Long List [APP-264**]. 41 developments are included in the short list including a number of proposed solar and BESS developments. The list of other developments included in the cumulative assessment were reviewed and developed in consultation with Wiltshire Council.

SLD-138	Description and DCO Process	Size and Scale	3.1.3 The sheer scale of the Scheme is a major concern. The five solar sites present as separate schemes comprising six industrial-scale engineering projects interacting with each other, five of which would qualify as NSIPs in their own right. The development (excluding the underground 400 kV cable) creates a 50 square kilometre 'footprint', some 10km from east to west and 5km from north to south. It amplifies the perception of overdevelopment and industrialisation of the area. It also affects how people experience the landscape and setting of the area. In numerous locations recipients would feel engulfed and overwhelmed by what they can see in multiple directions. This would significantly adversely impact quality of life, health, and wellbeing.	The Scheme has been designed to deliver the greatest possible benefit from the available land and the available grid connection, whilst avoiding, minimising and/or mitigating harmful environmental effects. As per the description set out in **ES Volume 1, Chapter 3: The Scheme [APP-055]** the total area within the DCO Order Limits encompasses approximately 1,237 hectares (ha). Of this, the 'Solar PV Sites' comprise approximately 749.1 ha of land, **ES Volume 1, Chapter 2: The Order Limits [APP-054]**. Around 479.5 ha of this land is proposed as being required for installation of solar PV, battery storage, and associated infrastructure. The remaining 269.5 ha would provide areas dedicated to ecological mitigation, measurable Biodiversity Net Gain (BNG) delivery, landscaping, offsets and agricultural land managed for environmental enhancement and habitat creation. Mitigation measures are set out in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060], Figure 3-4-1 to 3-4-5.2 Landscape and Ecology Mitigation Plan [APP-084]** and detailed within the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]**. The Cable Route Corridor, which stretches approximately 22 km from 'Lime Down D' to Melksham Substation and links together the Solar PV Sites, covers approximately 463.2 ha. Approximately 17.8 ha (of which 5.9 ha overlap with the Cable Route Corridor) is proposed for Highway Improvement Areas within which

				improvements to sections of the existing highway network will be completed to facilitate access to the Scheme, such as improvements to road edge and traffic management. Work will be undertaken by the Applicant and National Grid within the Existing National Grid Melksham Substation, requiring a total area of 12.8 ha. **ES Volume 1, Chapter 2: The Order Limits [APP-054].** The Applicant remains committed to delivering a Scheme that makes a meaningful contribution to the UK's transition to net zero, while also seeking to minimise adverse impacts and maximise opportunities for environmental enhancement and community benefits. The Applicant has considered health and wellbeing issues over the entirety of the Scheme area and a 2 km Zone of Influence extending from the Order Limits in **ES Volume 1, Chapter 18: Human Health [APP-070]**. In assessing changes to 'community identity, culture, resilience and influence', a community's spatial relationship to the Scheme has been a key consideration in how sensitive to change that community is, and how large a magnitude of impact that community is likely to experience in regard to sense of place and rural identity. In **ES Volume 3 Appendix 18-2 Human Health: Legislation, Policy, Guidance, and Supporting Information [APP-245],** the Applicant has explicitly identified Alderton, Corston, Hullavington, Lower Stanton St Quintin, Luckington, Norton, Rodbourne, and Sherston as locations particularly sensitive to change due to their proximity to the Solar PV Sites.

SLD-139	Cumulative and In-Combination Effects	Consideration of Cumulative Impacts	3.1.4 SLD has concerns that the Applicant has not properly engaged with both the intra-and inter-project cumulative effects. To take an example of the former, it has concerns that the Applicant has failed to take into account the cumulation of effects from experiencing the Scheme on multiple sides (e.g. from overlapping noise or glint and glare envelopes, or overlapping zones of visibility). To take an example of the latter, it has concerns that the Applicant has failed to take full account of the surrounding proposals and their effects (e.g. on the highways network or amenity). This is a key issue for a scheme of this size.	Full and extensive engagement, consideration, assessment and reporting of intra- and inter-project cumulative effects has been undertaken. An intra-project effects assessment has been undertaken whereby all overlapping effects across all technical disciplines are considered to determine where effects in one discipline (such as glint and glare) together with effects from another discipline (such as noise) could combine to generate a significant effect. The **In-Combination Effects Matrix [APP-264]** sets out all receptors and technical disciplines considered. The assessment is then reported in Table 21-6 and Table 21-7 of **ES Volume 1, Chapter 21: In-Combination and Cumulative Effects [APP-073].** With implementation of the secured management and mitigation measures, effect interactions do not increase the significance of effects identified in the Environmental Statement. With regard to inter project effects, a full assessment has been undertaken, considering 358 long list developments and 41 short-list developments. Refer to response above and to **ES Chapter 21 [APP-073].**

SLD-140	Description and DCO Process	Operational Life	3.2.1 The Scheme is unusual compared to many other NSIP solar developments in seeking 60 years of operational life, rather than 30 or 40 years ([APP-055], para 3.5.1). This is a departure from the usual "*upper limit of 40 years [which] is typical"* set out in NPS EN-3 (para 2.10.65). SLD consider that such a lengthy scheme, which has an expected operational lifetime the same as Sizewell C Nuclear Power Station, is functionally permanent and should be assessed as such. 3.2.2 Even if this primary position is not accepted, SLD consider that the decision-maker must take into account the policy landscape in favour of repowering schemes. This is found both in NPPF (para 165 and 168), and in the definition of "*repowering*" as CNP Infrastructure in NPS EN-1 (para 4.2.5). This sets out a policy preference for repowering which means the ExA cannot simply treat 60 years as a hard stop. Importantly, given the policies offer significant additional weight in favour of the Scheme because it is repowering (e.g. NPPF says "*in the cases of applications for the repowering and life-extension of existing renewable sites, give significant weight to the benefits of utilising an established site*"), the decision-maker must weigh in the analysis the fact that they are conferring that additional policy preference by granting permission now. 3.2.3 Whether or not the ExA consider the Scheme to be permanent, SLD consider that there must be investigation of whether (in fact) this Scheme would operate for 60 years (particularly given	National Policy Statement (NPS) EN-3 explicitly allows for differing periods of operation. Further, the Applicant is seeking a time limited consent for 60 years, as secured by Requirement 20 of the **Draft Development Consent Order [APP-015]**, which provides that the date of decommissioning for each part of the authorised development (i.e. the Scheme) must be no later than 60 years following the date of final commissioning. Therefore, the Scheme is temporary in nature.

			the asserted climate and energy benefits are measured against this 60-year figure). Among other things, SLD consider it imperative that the ExA assess whether the Applicant will or can secure an entitlement to the land for the Scheme as of right.	
SLD-141	Description and DCO Process	Scheme Description	3.3.1 Policy has been dealt with throughout this RR. At the WR stage, SLD's planning experts will produce a formal report on the policy aspects of the Scheme. 3.3.2 Among other things, however, SLD consider the Scheme to be unusual amongst other proposals and consider it to be a case where there should be a departure from the starting points in NPS EN-1 paras 4.2.6 and 4.2.15-4.2.17.	The Applicant notes this comment. The Applicant has set out why the CNP presumption applies to the Scheme in the **Planning Statement [APP-267]** section 9.5. The Applicant considers that even without applying the CNP presumption, the planning case is firmly in favour of development consent being granted.

SLD-142	Human Health	Cross-Cutting Issues and Impacts to Local Communities	3.4.1 As to human health, there are key policies in NPPF Part 8 which address social interaction, connectivity between people, and the promotion of healthy lives. This is a cross-cutting issue, as how individuals enjoy the landscape, enjoy recreation, enjoy socialising, and have a healthy life, is all connected to their relationship with the area in which they live. However, issues under recreation, highways and other topics above pose a real challenge to this. Across the examination, SLD will draw attention to how these cross-cutting issues impact local communities.	The Applicant is confident that the assessment undertaken in **ES Volume 1, Chapter 18: Human Health [APP-070]** is robust and adequately addresses the likely impacts on human health that are expected as a result of the Scheme, including those that have implications across multiple assessed topic areas. The Applicant highlights that the assessment of human health specifically relies upon the assessment outcomes for matters including but not limited to transport, noise, air quality, and recreation, to ensure that a holistic approach to assessing health and wellbeing has been undertaken in accordance with national and local policy requirements.
SLD-143	Human Health	Health Impacts	3.4.2 SLD will present further evidence on the health impacts of the Scheme. Preliminarily, SLD identify the following impacts as being of concern: • The impact which the loss of visual amenity, and the non-visual effects, would have on the mental health and wellbeing of locals. • The impact of a loss of access to green spaces by the Scheme, and reduced use of recreational routes where their settings have been impacted. This affects opportunities for physical exercise. • The impact of noise and vibration on mental health. • The disruption of PRoWs during construction.	The Applicant awaits Stop Lime Down Solar's further commentary on matters relating to human health in future submissions. The Applicant is confident that the assessment undertaken in **ES Volume 1, Chapter 18: Human Health [APP-070]** is robust and adequately addresses the likely impacts on human health that are expected as a result of the Scheme. The assessment finds that subject to implementation of mitigation measures, no significant adverse effects to human health are anticipated at any phase of the Scheme.
SLD-144	Description and DCO Process	Draft DCO	3.5.1 At the appropriate time, SLD will make submission on the terms of the draft DCO [APP-016]. This includes ensuring that there are proper constraints and	The Applicant notes this comment and welcomes further engagement with Stop Lime Down. The Commitments Register was submitted as part of the DCO

			requirements within its text, the requiring of appropriate mitigation and management to be provided for at the outline stage before detailed design, and management of the security of the decommissioning process (including bonds).	Application see [**APP-291]**. This sets out the environmental mitigation measures that would be adopted during the construction, operation and maintenance, and decommissioning phases of the Scheme. The Applicant is confident that the proposed management and mitigation measures set out in the **ES [APP-052 to APP-265]** are comprehensive and robust and that the Scheme aligns with national and local planning policy; this is outlined in the **Planning Statement [APP-267].**

SLD-145	Consultation and Engagement	Approach to Consultation	3.6.1 SLD has previously raised significant concerns about the approach of the Applicant to consultation. This was a matter that SLD has raised previously in correspondence with the Applicant, but also with Wiltshire Council and the Planning Inspectorate. SLD maintain concerns about the consultation conducted by the Applicant, and consider that many of the flaws of the Scheme stem from defective consultation. Were a proper and fulsome consultation on the Scheme undertaken, at the very least this would have had the benefit of improving some aspects of it and making it less harmful. In failing properly to approach consultation and respond to local concerns, the Applicant has amplified many of the substandard aspects of the Scheme.	The Applicant considers that the statutory consultation has been robust, thorough and undertaken in accordance with the requirements of the Planning Act 2008, the Environmental Impact Assessment (EIA) regulations, and the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009. The **Consultation Report [APP-022]** sets out the Applicant's approach to pre-application consultation. The Applicant considers the materials provided were adequate and informative, and presented information using standard mapping conventions. Throughout the consultation period, anyone was welcome and encouraged to get in touch through any of the free-to-use communication channels provided, including email, freephone, and post. Respondents were also invited to attend the in-person and virtual community information events, where they could view the maps and ask questions or seek clarification directly to the Project team. The Applicant also notes that the examination process provides a further opportunity for interested parties to comment on the Scheme. This examination is managed by an independently appointed Examining Authority. Further to this, the Applicant provided an extended relevant representation period beyond the minimum statutory timeframe to allow sufficient time for members of the public

				to review the submitted application documents and register as an interested party.
SLD-146	Description and DCO Process	Conclusion	4.1.1 SLD welcome the opportunity to engage in the examination of the Scheme, and will make further submissions (including at the WR stage) in the future. However, for the host of reasons outlined above, SLD cannot	The Applicant notes this comment and welcomes continued engagement with Stop Lime Down.

			support the Scheme, and ask that the ExA recommend that the Secretary of State reject this application.	
SLD-147	Description and DCO Process	Conclusion	4.1.2 SLD accept that the Government has set out strong policy support for solar in the UK. However, that strong policy support does not obviate the need to consider the harms of the proposals, and the need to refuse such proposals where they are particularly harmful. That is the conclusion that SLD, supported by its experts, has come to in this case. SLD consider that the harms of the Scheme substantially outweigh the benefits, and that the policy favour for solar development is overcome.	The Commitments Register was submitted as part of the DCO Application see **[APP-291].** This sets out the environmental mitigation measures that would be adopted during the construction, operation and maintenance, and decommissioning phases of the Scheme. The Applicant is confident that the proposed management and mitigation measures set out in the **ES [APP-052 to APP-265]** are comprehensive and robust and that the Scheme aligns with national and local planning policy; this is outlined in the **Planning Statement [APP-267].**
SLD-148	Description and DCO Process	Conclusion	4.1.3 SLD consider that the need to reject this Scheme stems from its entirely inappropriate location and scale. As a result of such a large proposal in that location, chosen with the opposition of the local community, elected officials, and statutory bodies, the Scheme produces far more planning harms than the typical NSIP solar scheme. Further, while Government policy establishes the in-principle benefit of solar schemes, there are features of the design of this Scheme which mean that the Applicant has overstated its benefits, and made it more harmful than the typical scheme.	The Applicant notes this comment. The Applicant has assessed adverse impacts arising from the Scheme and has also set out within the **Environmental Statement [APP-052 – APP-065]** the steps taken to avoid, mitigate and minimise these impacts as far as possible, and has prepared a number of management plans that will ensure that impacts are kept to a minimum. These management plans are secured in the **Draft Development Consent Order [APP-016].** The Applicant has applied the planning balance in the **Planning Statement [APP-267]** and considers that the identified substantial benefits of the Scheme outweigh the residual harms that would arise. Further, the CNP presumption means that these residual impacts are outweighed by the urgent need for the Scheme.

SLD-149	Description and DCO Process	Conclusion	4.1.4 Overall, the Scheme is a very substantial proposal which is poorly devised, damaging, and inadequately justified. It would cause substantial and functionally permanent harmful effects to the land and landscape, the environment, the heritage and ecology of the area, rural businesses, and local communities. The harms of this scheme substantially outweigh its benefits, and SLD invite the ExA to recommend to the Secretary of State that consent not be granted.	The Applicant acknowledges that there will be impacts on the community as a result of the Scheme, which may be a source of concern for local residents. The Secretary of State will balance those potential impacts and changes against the urgent need and critical national priority for the Scheme as set out in Government policy. The Applicant has assessed adverse impacts arising from the Scheme and has also set out within the **ES [APP-052 – APP-065]** the steps taken to avoid, mitigate and minimise these impacts as far as possible, and has prepared a number of management plans that will ensure that impacts are kept to a minimum. These management plans are secured in the **Draft Development Consent Order [APP-016].**

4.8 Community Action: Whitley and Shaw

Table 4-8 RR-0935

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
CAWS-001	Description and DCO Process	Executive Summary	The CAWS Relevant Representation has been submitted separately as an email attachment and forms the complete and authoritative statement of its case in this Examination at this point in time. The following text is provided as a high-level summary only, to assist the Examining Authority in navigating the principal cumulative issues identified. It does not seek to restate the full evidence base and should not be relied upon in place of the detailed analysis and conclusions contained in the submitted Representation.	The Applicant notes CAWS' Executive Summary. The Applicant has reviewed the detailed Representation in full and has provided responses to the specific points raised within sections 1-13 (and associated Annex A) elsewhere in this document, addressing each technical matter on its merits.
CAWS-002	Description and DCO Process	Executive Summary	The CAWS Relevant Representation demonstrates that the villages of Shaw and Whitley are uniquely vulnerable to the cumulative impacts of the Lime Down Solar Park because they sit in a down-slope, downstream and down-network position within a highly complex and interconnected headwater hydrological system. CAWS has identified approximately 79 operational, consented, proposed or reasonably foreseeable energy and enabling schemes affecting the Melksham–Shaw–Whitley area, creating one of the most concentrated clusters of energy infrastructure in Wiltshire. In this context, impacts do not arise in isolation but interact across shared systems, meaning that site-by-site assessment systematically underestimates risk and fails to capture	The Applicant confirms that the matters raised in the Executive Summary of CAWS' Relevant Representation, including cumulative considerations, are addressed in detail in the Applicant's Response below. The Applicant does not agree that the villages of Shaw and Whitley are uniquely vulnerable to unassessed cumulative hydrological impacts arising from the Scheme. Interaction with other developments has been fully explored within each of the technical assessments [**APP-059 - APP-072**] with a summary of each of these assessments provided within Environmental Statement Chapter 21 In-Combination and Cumulative Effects **[APP-073].** The methodology for identifying future proposed or consented

			how construction activity, safety hazards and environmental pathways combine and propagate downstream.	schemes and undertaking the cumulative assessment is in accordance with Planning Inspectorate Advice Note 17 on Cumulative Effects. The four stage methodology is described within **ES Volume 1, Chapter 6 EIA Methodology [APP-058].** 358 developments were included in the Long List **[APP-264].** 41 developments are included in the short list including a number of proposed solar and BESS developments. The list of developments included in the cumulative assessment were reviewed and developed in consultation with Wiltshire Council. Cumulative effects have therefore been assessed in accordance with the EIA Regulations and relevant guidance within **ES Volume 1, Chapter 21 Cumulative and In-Combination Effects [APP-073]**, drawing on the findings of **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [APP-063]** and the **Flood Risk Assessment and Drainage Strategy suite [APP-210 to APP-218].** The cumulative assessment considers operational, consented, proposed and reasonably foreseeable developments and assesses the potential for interaction at shared downstream receptors within the relevant catchments. The hydrology and flood risk assessment does not rely on site-by-site isolation but considers the potential for downstream propagation of effects through shared drainage networks. Construction-phase risks associated with the Cable Route Corridor and solar sites, including temporary runoff generation and interaction with watercourses, are

				assessed and controlled through embedded mitigation and the secured measures within the **Outline Construction Environmental Management Plan [APP-277],** with detailed arrangements subject to approval under the **Draft Development Consent Order [APP-016].** On this basis, and with the application of embedded and secured mitigation, the assessment concludes that the Scheme would not give rise to significant cumulative adverse effects on surface water, groundwater or downstream flood risk receptors, and would not increase flood risk elsewhere.
CAWS-003	Description and DCO Process	Executive Summary	A central concern relates to Battery Energy Storage Systems (BESS) and their associated fire, plume and contamination risks when considered cumulatively. Although the Lime Down BESS is geographically separated from Shaw and Whitley, it is functionally connected through shared hydrology and reliance on Melksham Substation. CAWS has demonstrated credible contamination pathways whereby toxic fire emissions and contaminated firewater released during a BESS incident could be conveyed through interconnected headwater drainage networks into Gauze Brook and ultimately the River Avon. These risks are compounded by BESS clustering, finite emergency response capacity, reliance on optimistic single-container fire assumptions, and the absence of a catchment-scale assessment of contaminated firewater behaviour under exceedance or failure conditions. When assessed cumulatively,	The Applicant has reviewed the detailed Representation in full and has provided responses to the specific points raised here in Section 7.

			these factors give rise to non-linear escalation of risk that cannot be addressed through site-specific mitigation or deferred design.	
CAWS-004	Description and DCO Process	Executive Summary	The 22 km Cable Route Corridor represents a further critical cumulative pathway, particularly during construction. The representation demonstrates that repeated trenching, haul routes, HDD works and drainage crossings through sensitive headwater catchments create foreseeable surface-water exceedance and downstream flood risk affecting Shaw and Whitley. Empirical evidence from National Grid's Visual Impact Provision underground cabling project near Bishops Cannings shows that such construction activity can generate focused runoff, off-site flooding and sustained impacts beyond the works boundary in comparable rural headwater environments. In the absence of a corridor-wide, construction-phase hydrological assessment and a transparent appraisal of reasonable alternative cable routes or connection strategies, it has not been demonstrated that the proposed route represents the least harmful reasonable option. Taken together with the scale of existing and proposed infrastructure, these deficiencies mean that cumulative hydrological, contamination and safety impacts affecting Shaw and Whitley have	The Applicant confirms that the matters raised in the Executive Summary of CAWS' Relevant Representation are addressed in detail in the Applicant's Response below.

			not been adequately identified or assessed.	
CAWS-005	Description and DCO Process	Introduction and Status of This Representation	1. Introduction and Status of this Representation 1.1 This Relevant Representation is submitted by Community Action: Whitley and Shaw (CAWS) in relation to the Lime Down Solar Park Development Consent Order (DCO) application (EN010168). 1.2 CAWS is a local community group representing the interests of residents of Shaw and Whitley, two rural settlements within Melksham Without Parish. CAWS's role in the Examination is to identify and evidence how the proposed development, when considered in the round and in combination with other development, affects these settlements, particularly where impacts arise indirectly, cumulatively, or beyond the Order Limits. 1.3 CAWS supports renewable energy generation and the UK's net zero objectives. This submission does not object to renewable energy in principle, nor does it assert that the Lime Down Solar (LDS) proposal would necessarily be unacceptable if assessed in isolation.	The Applicant notes the Relevant Representation submitted by Community Action: Whitley and Shaw (CAWS) and its focus on the potential cumulative and indirect effects on the settlements of Shaw and Whitley. Cumulative Construction Disturbance: A comprehensive Cumulative and In-Combination Effects Assessment has been undertaken in accordance with Planning Inspectorate Advice Note 17 and the relevant NPS EN-1, NPS EN-3 and NPS EN-5 requirements which are set out within **ES Volume 1, Chapter 21: Cumulative and In-Combination Effects [APP-074].** The list of developments included in the cumulative assessment was reviewed and developed in consultation with Wiltshire Council. Embedded mitigation is secured through the **Outline CEMP [APP-277]** and the **Outline CTMP [APP-287]**, with Requirements 13 and 15 of the **draft Development Consent Order (DCO) [APP-016]** respectively ensuring that a detailed plan must be approved before works commence. Surface-water exceedance and contamination pathways:

			1.4 CAWS's focus on Shaw and Whitley arises because these settlements occupy a down-slope, downstream, and down-network position relative to the LDS proposal and associated infrastructure. As a result, they are particularly sensitive to: • cumulative construction disturbance; • surface-water exceedance and contamination pathways; • infrastructure-enabled risk transmission; and • constraints on emergency response and system capacity. 1.5 The purpose of this Relevant Representation is to assist the Examining Authority in determining whether the LDS application provides a sufficiently robust evidence base to assess cumulative impacts affecting Shaw and Whitley, and whether the information before the Examination is adequate to support a properly informed and legally resilient decision.	**ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [APP-063]** assesses hydrology, flood risk and drainage effects beyond the Order limits, including potential effects on downstream settlements and receptors and cumulative effects where relevant, and the assessment concludes that the Scheme would not increase off site flood risk or create new pathways for surface water exceedance. **ES Volume 3, Appendix 11-1 Flood Risk Assessment and Drainage Strategy - Lime Down Covering Report [APP-210]** controls runoff so there is no increase in runoff rates or volumes leaving the Site, and the assessment considers pollution pathways and identifies mitigation to prevent adverse effects on receiving waters and downstream communities. Construction phase risks, including disturbance, sediment laden runoff and contamination pathways, are set out in the **Outline CEMP [APP-277]** which includes measures to control soil compaction, manage temporary drainage and protect water quality. This also provides the basis for managing risks that could affect local access routes and emergency response during construction. <u>Infrastructure-enabled risk transmission:</u> The Applicant confirms that the Existing National Grid Melksham Substation was identified as the point of connection following extensive engagement with National Grid. This selection was based on available capacity, network resilience and strategic grid planning, and does not introduce any mechanism by which risk is

				transmitted to downstream settlements such as Shaw and Whitley. High-voltage electricity transmission at 400 kV is specifically designed to operate independently of local distribution networks, enabling the efficient bulk transfer of energy across the NETS and preventing localised overload or risk propagation. Contrary to the suggestion that the Scheme increases vulnerability, the **Statement of Need [APP-266]** explains that connecting to the NETS ensures the Scheme does not constrain or compromise the feasibility or timing of distribution network connections required for local growth. <u>Constraints on emergency response and system capacity:</u> A cumulative major accident assessment (including Building Failure, Fire and Associated Explosions) has also been undertaken in **ES Volume 1, Chapter 20: Other Environmental Matters [APP-072].** This assessment concludes that with the mitigation measures listed in Table 20-19 to reduce the risk of fire and other shortlisted events, no cumulative effects are predicted. Moreover, an **Outline Battery Safety Management Plan (OBSMP) [APP-286]** has been submitted with the Application. The OBSMP confirms that a robust and validated Emergency Response Plan (ERP) will be developed at the detailed design stage in consultation with Dorset & Wiltshire Fire and Rescue Service. Section 5.4 of the OBSMP sets out the typical emergency response protocols, procedures and safety information that will be included in the ERP. The ERP will

				apply across all phases of the Scheme, including construction, operation, and decommissioning. These measures would further ensure that in the unlikely event a BESS fire broke out, nearby Schemes would remain unaffected. The Applicant's OBSMP is fully compliant with NFCC Guidance for the Scheme. The OBSMP covers all credible fire, explosion, toxic emission, and pollution risks. As now mandated under NFPA 855 (2026) the Applicant will only be able to select a BESS system that has undertaken Large Scale Fire Testing (LSFT). At the detailed design stage, the selected BESS LSFT data will be leveraged to fully inform inputs for risk assessment tools which will be utilised together with detailed consequence modelling to provide a comprehensive site operations and emergency response safety audit, this is stipulated in the OBSMP pre-construction requirements (Section 6). Section 2.4.2 of the OBSMP stipulates that: *"Final BESS design and site layout will have been validated through mandatory Large Scale Fire Testing (LSFT) and rigorous consequence modelling to minimise the requirement for any D&WFRS intervention in a thermal runaway incident. LSFT must establish minimum equipment spacing distances that demonstrate there is no fire propagation to adjacent BESS enclosures or ESS equipment. D&WFRS intervention in worst case scenarios would typically be limited to boundary cooling of adjacent BESS and Energy Storage System (ESS) units to prevent the fire from spreading.*

				This strategy will be finalised with D&WFRS and be clearly communicated in the Emergency Response Plan (ERP); *• To ensure that fire, smoke, and any release of toxic gases does not significantly impact site operatives, first responders, and the local community; and* *• To ensure that firewater run-off is contained and tested before release or, if necessary, removed by tanker and treated offsite."* The Applicant is in the process of agreeing a Statement of Common Ground (SOCG) with D&WFRS to provide assurance that all safety and emergency response requirements are fulfilled. D&WFRS will have separate Risk Management and Site-Specific Risk Information (SSRI) plans for every BESS facility in the area, the Applicant's OBSMP section 5.4 covers information that must be provided for this documentation in addition to ERPs information requirements. The **OBSMP [APP-286]** is secured through Requirement 6 (Battery safety management) in Schedule 2 of the **Draft DCO [APP-016],** which provides that Work No. 2 must not commence until a Battery Safety Management Plan has been submitted to and approved by the relevant planning authority. The approved plan must be substantially in accordance with the Outline Battery Safety Management Plan. The Draft DCO also requires the relevant planning authority to consult with Dorset and Wiltshire Fire and Rescue Service and the Environment Agency before determining the application, and that the Battery Safety

				Management Plan must be implemented as approved.

CAWS-006	Cumulative and In-Combination Effects	Introduction and Status of This Representation	1.6 CAWS's concerns arise not solely from the LDS red-line boundary, but from connected and interacting impact pathways which extend beyond the Order Limits and operate across shared systems. These include, but are not limited to: • hydrological pathways linking construction areas, cable routes, and BESS sites to Shaw and Whitley; • linear construction impacts associated with the 22 km Cable Route Corridor; • safety, contamination, and emergency response considerations arising from clustered Battery Energy Storage Systems; and • system-level reliance on Melksham Substation as a regional energy hub. 1.7 Melksham Substation plays a critical enabling role in the LDS proposal and in the wider cluster of energy infrastructure affecting the area. Increased reliance on this single node raises issues of operational resilience, single-point vulnerability, and coordinated emergency response, with potential implications for communities connected to and downstream of that infrastructure, including Shaw and Whitley. 1.8 Taken together, these matters give rise to cumulative effects and risks that are not readily captured by site-by-site or asset-specific assessment. CAWS submits that, in the absence of a system-level understanding of how impacts accumulate, interact, and propagate	The Applicant notes CAWS's concern that relevant impact pathways may extend beyond the Order Limits. As per the methodology set out in **ES Volume 1, Chapter 6: EIA Methodology [APP-068**] each environmental topic within the ES has defined an appropriate Study Area that reflects the realistic spatial extent within which effects from that topic could occur. These Study Areas are set in line with recognised guidance, professional standards and receptor-specific sensitivities and are designed to capture any potential effects that may arise beyond the Order Limits, including cumulative, indirect, downstream or system-linked pathways where relevant. Study Areas have been reviewed and agreed with statutory consultees as part of the Scoping and Statutory Consultation process, specifically within the Scoping Report and Preliminary Environmental Information Report (PEIR). <u>Hydrological pathways linking construction areas, cable routes, and BESS sites to Shaw and Whitley:</u> Regarding hydrological pathways beyond the Order limits, including linkages between construction areas, the cable route corridor, BESS sites and downstream receptors such as Shaw and Whitley, have been assessed as part of the hydrology, flood risk and drainage assessment in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [APP-063].** The assessment considers cumulative effects where relevant and concludes that the Scheme would not give rise to cumulative increases in flood risk or new surface

			through shared networks, the Examining Authority cannot be satisfied that cumulative impacts have been adequately assessed. 1.9 This Relevant Representation is therefore structured around questions of evidential sufficiency and cumulative assessment, addressing whether the LDS application enables the Examining Authority to assess the proposal's impacts on Shaw and Whitley in the round, across construction, operation, safety, contamination, emergency response, and infrastructure resilience. 1.10 CAWS is not asserting that the Applicant has failed to submit technical material altogether, nor that each individual technical document is inherently flawed in isolation. CAWS's concern is whether the Applicant's evidence base, taken together, is sufficiently integrated, cumulative, and construction-phase specific to enable the Examining Authority to understand how risks and effects interact across shared systems affecting Shaw and Whitley.	water or contamination pathways affecting downstream communities. Potential cumulative effects associated with linear construction activities along the cable route corridor are assessed separately in **ES Volume 3, Appendix 11-9 Flood Risk Assessment and Drainage Strategy - Lime Down Cable Route Corridor [APP-218],** including drainage controls and measures to manage surface water exceedance and contamination pathways during construction. Construction phase measures are secured through the construction environmental management framework in **Outline CEMP [APP-277]** and are designed to ensure no increase in runoff rates or volumes leaving the Site and to prevent pollution of receiving waters. <u>Linear Construction Impacts Associated with the Cable Route Corridor</u> Linear construction impacts and in particular the consideration of 'integrated, cumulative and construction-phase specific effects … to understand how risks and effects interact across shared systems' has been comprehensively assessed via the Environmental Statement Technical Chapters [**APP-059 - APP-072**] and via extensive engagement, consideration, assessment and reporting of intra- and inter-project cumulative effects. An intra-project effects assessment has been undertaken whereby all overlapping effects across all technical disciplines are considered to determine where effects in one discipline (such as ecology) together with effects

				from another discipline (such as noise) could combine to generate a significant effect. The In-Combination Effects Matrix [**APP-264**] sets out all receptors and technical disciplines considered. The assessment is then reported in Table 21-6 and Table 21-7 of **ES Volume 1, Chapter 21 In-Combination and Cumulative Effects [APP-073**]. With implementation of the secured management and mitigation measures, effect interactions do not increase the significance of effects identified in the Environmental Statement. <u>System-level reliance on Melksham Substation as a regional energy hub</u> The Applicant does not agree that the Scheme creates any issues relating to "*operational resilience, single-point vulnerability, and coordinated emergency response*" and therefore does not consider there are any relevant "*implications for communities connected to and downstream of that infrastructure*" NESO's Security and Quality of Supply Standard (SQSS) sets out the criteria and methodology for planning and operating the National Electricity Transmission System and the connection at the National Grid Melksham Substation must be designed to meet those standards, including 'cascade' protection to lower voltage connections downstream of that infrastructure .. A full explanation of this and the wider system-level context is provided in the response to Sections 1.1–1.5. A cumulative major accident assessment (including Building Failure, Fire and Associated Explosions) has also been undertaken in **ES Volume 1, Chapter 20:**

				Other Environmental Matters [APP-072]. This assessment concludes that with the mitigation measures listed in Table 20-19 to reduce the risk of fire and other shortlisted events, no cumulative effects are predicted.

CAWS-007	Cumulative and In-Combination Effects	Strategic Planning Context and Development Plan Weight	2. Strategic Planning Context and Development Plan Weight 2.1 The Joint Melksham Neighbourhood Plan 2 (JMNP2) is a made neighbourhood plan and forms part of the statutory development plan for Melksham Without Parish, including Shaw and Whitley. 2.2 Although the LDS application is determined under the Planning Act 2008, neighbourhood plan policies remain material considerations, particularly where they address: • flood risk and drainage; • renewable energy and associated infrastructure; • cumulative impacts; • landscape character and settlement separation; • community safety, amenity, and infrastructure capacity. 2.3 CAWS submits that multiple JMNP2 policies are directly engaged by the LDS proposal and that compliance with those policies cannot currently be demonstrated when cumulative impacts are properly taken into account.	Annex B of the **Planning Statement [APP-267]** sets out the Scheme's compliance with local planning policy, including the Joint Melksham Neighbourhood Plan 2. (see page 877).

CAWS-008	Hydrology, Flood Risk and Drainage	Strategic Planning Context and Development Plan Weight	2.4 CAWS notes that the Government has also published a consultation draft of a revised National Planning Policy Framework. While this consultation document does not constitute adopted policy and carries no statutory weight for the purposes of this Examination, it signals a clear direction of travel in national planning policy towards treating flood risk as a primary spatial constraint, strengthening expectations around drainage and surface-water management, and reinforcing the need for robust consideration of cumulative impacts. This emerging policy direction is consistent with, and reinforces, the principles within the current NPPF and relevant National Policy Statements, highlighting the importance of ensuring that cumulative impacts are adequately assessed at the consent stage rather than deferred.	Government began a consultation on an updated NPPF on 16 December 2025, with the consultation scheduled to close on 10 March 2026. As set out on page 106 of the consultation document, the updated NPPF does not become a material consideration until the *"day of publication of the final version".* It is likely that the final published version will undergo further significant changes as a result of consultation, particularly given the extent of changes proposed. The Applicant therefore considers the draft to have limited weight at this stage, but it will be possible to consider it as appropriate should a final version be published during the Examination. In the meantime, the Applicant has assessed the cumulative impacts of the Scheme, in line with current policy, as set out in **ES Volume 1, Chapter 21 Cumulative and In-Combination Effects [APP-073]** which concludes that in-combination effect interactions during the construction, operation and decommissioning phase do not increase the significance of effects. No significant inter project cumulative effects are identified other than Skylark at a District Level during the operational phase and on four PRoWs and Corsham Park (tourism and recreation) during the construction phase.

CAWS-009	Hydrology, Flood Risk and Drainage	Exceptional Concentration of Energy Infrastructure	3.1 Based on the cumulative evidence assembled by CAWS, including analysis of operational, consented, proposed and reasonably foreseeable schemes, the Shaw and Whitley area represents one of the most concentrated clusters of energy infrastructure in Wiltshire and nationally. 3.2 Approximately 79 operational, consented, proposed or reasonably foreseeable energy and enabling projects affect the Melksham–Shaw–Whitley area, including: • large-scale solar developments; • multiple Battery Energy Storage Systems (BESS); • substations and grid parks; • underground cable corridors; • enabling and reinforcement works. 3.3 This pattern of development is strategic in effect, not incremental. It represents a functionally linked infrastructure cluster, not a series of isolated schemes. 3.4 JMNP2 Policy 2 requires that renewable and associated infrastructure proposals do not result in unacceptable cumulative impacts when considered together. 3.5 The LDS application does not demonstrate that adding LDS to an already saturated infrastructure environment avoids unacceptable cumulative impacts on Shaw and Whitley.	Interaction with other developments has been fully explored within each of the Environmental Statement technical assessments [**APP-059 - APP-072**] with a summary of each of these assessments provided within **ES Volume 1, Chapter 21: In-Combination and Cumulative Effects [APP-073]**. The methodology for identifying future proposed or consented schemes and undertaking the cumulative assessment is in accordance with Planning Inspectorate Advice Note 17 on Cumulative Effects. The four-stage methodology is described within **ES Volume 1, Chapter 6 EIA Methodology [APP-058].** 58 developments were included in the Long List [**APP-264**] and 41 developments in the short list including a number of proposed solar and BESS developments. The list of developments included in the cumulative assessment were reviewed and developed in consultation with Wiltshire Council. Taking a conservative worse case approach, significant cumulative effects are identified at a limited and discrete number of receptors comprising tourism and recreation impacts during the construction phase on Corsham Park, skylark at a District level and PRoW WT|CORM|122, long path, Palladian Way and Sustrans Cycle Route 403. Regarding Policy 2 of the Joint Melksham Neighbourhood Plan 2, it is not considered that the proposal will result in an unacceptable cumulative impact. However, in line with NPS EN-1 paragraph 4.1.5, the Secretary of State will take into account the identified cumulative adverse impacts in its decision

				making and these will be weighed as part of the overall planning balance.

CAWS-010	Cumulative and In-Combination Effects	Why Site-by-Site Assessment Is No Longer Adequate	4. Why Site-by-Site Assessment Is No Longer Adequate 4.1 The LDS Environmental Statement relies predominantly on site-specific assessment, assuming: • stable baseline conditions; • independent impacts; • mitigation operating in isolation; • sufficient capacity in shared systems such as hydrology, roads, and emergency services. 4.2 In the Shaw and Whitley context these assumptions no longer hold. Baseline conditions are already eroded, impacts interact and amplify, and multiple systems have finite capacity. 4.3 Site-by-site assessment therefore systematically underestimates cumulative risk, contrary to the intent of cumulative assessment under the EIA Regulations, the NPPF, and established guidance. 4.4 CAWS notes that the Applicant has provided additional topic appendices and plans (including Flood Risk Assessments for separate parcels, a Cable Route Construction Method Statement, BESS Fire Emissions Modelling, and a High-Level Electromagnetic Field Assessment). CAWS's submission is not that no assessment exists, but that the assessments remain predominantly asset-specific, and do not provide the integrated, construction-phase, catchment-scale and cluster-scale	The Environmental Statement identifies effects on all receptors taking into consideration a realistic worse case scenario. The assessment of effects has been undertaken based on existing knowledge, techniques and equipment. A 'reasonable worst-case' scenario has been used with respect to the construction and decommissioning methods, location (proximity to sensitive receptors), phasing and timing of activities as defined in **ES Volume 1 Chapter 3 The Scheme [APP-055].** Site by site as well as cumulative assessment has been undertaken. There is no absence of cumulative assessment within the Application. The project alone scenario considers all elements on the Lime Down Scheme for each Environmental Statement technical discipline **[APP-059 - APP-072**]; the in-combination effects assessment considers the combined effect of individual impacts from the Scheme, for example, where a single receptor is affected by both noise and traffic during the construction phase **[APP-073**]; and the cumulative assessment reports the combined effects of other proposed schemes which may interact cumulative with the Scheme [**APP-073**]. The hydrology, flood risk and drainage assessment is structured to demonstrate that there would be no off site impacts, and this is the controlling requirement of the assessment. Each parcel and infrastructure element is therefore assessed on a site specific basis to confirm that runoff rates, runoff volumes and exceedance behaviour would not

			understanding needed to assess effects on Shaw and Whitley *"in the round"*.	increase beyond the Order limits, with downstream receptors protected to the satisfaction of the relevant consultees. This approach is set out in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [APP-063],** which assesses effects beyond the red line boundary and does not rely on assumptions of spare capacity in downstream systems. While the assessments are presented by site and asset, they are not isolated or independent in outcome. The site by site conclusions are underpinned by a scheme wide drainage strategy that applies consistent runoff controls and mitigation across the Scheme, ensuring that there is no cumulative off site effect when the Scheme is considered in the round. This approach reflects the requirement that no individual element gives rise to off site effects, rather than relying on post hoc cumulative mitigation. **ES Volume 3, Appendix 11-1 Flood Risk Assessment and Drainage Strategy - Lime Down Covering Report [APP-210].** Construction phase interactions are addressed through scheme wide controls secured through the construction environmental management framework, which integrates surface water management, soil handling and pollution prevention measures across all construction areas and linear infrastructure. **Outline Construction Environmental Management Plan [APP-277].**

CAWS-011	Cumulative Effects	Hydrology and Flood Risk – A Core Cumulative Pathway	5. Hydrology and Flood Risk – A Core Cumulative Pathway 5.1 Headwater catchment sensitivity 5.1.1 Shaw and Whitley lie within an exceptionally dense headwater drainage network, with multiple small streams, ditches and ephemeral channels draining from higher ground and converging through, not around, the settlements. The map at Annex C highlights these drainage pathways that flow through Whitley and converge on South Brook in Shaw and onwards towards the River Avon in Melksham. 5.1.2 Flood risk arises primarily from surface-water exceedance, not main-river flooding, making the villages highly sensitive to up-slope land disturbance.	All sources of flood risk relevant to Shaw and Whitley have been assessed, including surface water, fluvial, groundwater and artificial sources, with specific consideration of headwater catchment processes and downstream receptors beyond the Order limits in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [APP-063].** The assessment does not assume that flood risk is limited to main river flooding and explicitly considers surface water exceedance mechanisms relevant to settlements located within headwater drainage networks. The drainage strategy is designed to ensure that up slope land disturbance associated with the Scheme does not result in increased surface water runoff or exceedance downstream. This is achieved by controlling runoff rates and volumes so there is no increase leaving the Site, regardless of local drainage density or pathway configuration, as set out in **ES Volume 3, Appendix 11-1 Flood Risk Assessment and Drainage Strategy - Lime Down Covering Report [APP-210].** Construction phase risks associated with soil disturbance and temporary works are managed through secured controls in **Outline Construction Environmental Management Plan [APP-277],** ensuring that the Scheme does not increase surface water flood risk at Shaw and Whitley.

CAWS-012	Cumulative Effects	Hydrology and Flood Risk – A Core Cumulative Pathway	5.2.1 The construction phase represents the period of greatest hydrological vulnerability. 5.2.2 Risks include: • cable trenching cutting across drainage paths; • trenches acting as preferential flow routes; • soil compaction reducing infiltration; • temporary haul roads intercepting runoff; • sediment mobilisation reducing ditch and culvert capacity. 5.2.3 Flood Zone mapping does not capture these mechanisms. Reliance on Flood Zone classification alone is therefore insufficient.	The construction phase is recognised as the period of greatest potential hydrological vulnerability and the assessment does not rely on Flood Zone classification alone. Flood Zone mapping is not used as a proxy for construction phase hydrological risk and reliance on Flood Zone classification alone would be insufficient to capture the mechanisms identified. These mechanisms and their potential effects beyond the Order limits are assessed within **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [APP-063]**. Construction phase risks are addressed through defined drainage principles and secured controls rather than screening by Flood Zone. This includes cable trenching across drainage paths, temporary excavations influencing flow routing, temporary access routes intercepting runoff, changes in infiltration behaviour during construction, and sediment mobilisation affecting ditches and culverts, as set out in **ES Volume 3, Appendix 11-1 Flood Risk Assessment and Drainage Strategy - Lime Down Covering Report [APP-210]** and, for linear works, in **ES Volume 3, Appendix 11-9 Flood Risk Assessment and Drainage Strategy - Lime Down Cable Route Corridor [APP-218]**. Mitigation for these mechanisms is secured through scheme wide controls in **Outline Construction Environmental Management Plan [APP-277]**, ensuring that construction activities do not give rise to increased flood risk or reduced drainage capacity downstream.

				Moreover, soil handling, storage and reinstatement measures to protect soil structure and avoid compaction are set out in the **Outline Soil Resources Management Plan (SRMP) [APP-280]**, which accompanies the DCO Application. The SRMP includes measures to control construction trafficking, manage soil stripping and storage, and ensure reinstatement of soils following construction, thereby maintaining soil permeability and reducing the potential for compaction-related runoff.

CAWS-013	Cumulative Effects	Hydrology and Flood Risk – A Core Cumulative Pathway	5.3 Cumulative hydrological effects and evidential sufficiency 5.3.1 While individual schemes may claim *"minor"* impacts, multiple schemes disturbing multiple headwaters simultaneously creates a foreseeable and material flood risk for Shaw and Whitley. 5.3.2 CAWS acknowledges that the Applicant has submitted multiple Flood Risk Assessments and drainage strategies for discrete site parcels and for the Cable Route Corridor. These provide useful local context and mitigation assumptions. However, they remain predominantly asset-specific and do not provide a construction-phase, catchment-scale cumulative assessment that tests how multiple disturbed headwaters may interact, whether exceedance conditions may arise, or how downstream receptors (including Shaw and Whitley) would be affected where flow pathways converge through the settlements. 5.3.3 Flood Zone mapping does not capture the principal construction-phase mechanisms of concern (including soil compaction, trenching effects, temporary haul routes, altered flow pathways, sediment mobilisation, and reduced ditch/culvert capacity). Reliance on Flood Zone classification and site-by-site assessment is therefore insufficient to demonstrate that downstream flood risk to Shaw and Whitley would not increase during construction. 5.3.4 CAWS therefore submits that	The hydrology, flood risk and drainage assessment is structured to demonstrate that the Scheme would not give rise to off-site flood risk, including during construction, and this requirement applies to each parcel and infrastructure element so that no cumulative increase in flood risk can occur. Downstream receptors such as Shaw and Whitley are included within the assessment scope in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [APP-063]**, and Flood Zone mapping is not relied upon as the sole basis for assessing construction phase risk. Construction phase mechanisms are addressed through defined drainage principles and secured controls rather than Flood Zone classification. These include temporary changes in flow routing, infiltration behaviour and drainage capacity, and are managed through a scheme wide drainage strategy applied consistently across all works, including linear infrastructure, as set out **in ES Volume 3, Appendix 11-1 Flood Risk Assessment and Drainage Strategy - Lime Down Covering Report [APP-210]** and **ES Volume 3, Appendix 11-9 Flood Risk Assessment and Drainage Strategy - Lime Down Cable Route Corridor [APP-218].** Any works in proximity to watercourses will be subject either to the relevant environmental permitting regime or to controls secured through the Development Consent Order. Ongoing discussions regarding potential

			compliance with JMNP2 Policy 3, NPPF paragraphs 159–169 and EN-1 paragraph 5.7 has not been demonstrated in respect of construction-phase and cumulative surface-water flood risk affecting Shaw and Whitley.	disapplication of certain permits do not remove or weaken the protections afforded to watercourses, as equivalent or enhanced controls would be secured through requirements and method statements. Construction phase controls, including measures to protect watercourses and manage temporary drainage and pollution risk, are secured through **Outline Construction Environmental Management Plan [APP-277],** ensuring that construction activities do not increase flood risk or adversely affect downstream receptors.

CAWS-014	Cumulative Effects	Cable Route Corridor: Construction Uncertainty and Cumulative Effect	6. Cable Route Corridor: Construction Uncertainty and Cumulative Effect 6.1 Scale and character of the Cable Route Corridor 6.1.1 The LDS proposal includes a 22 km underground Cable Route Corridor (CRC) connecting the site to Melksham Substation. 6.1.2 Although underground in operation, the CRC constitutes a linear, high-intensity construction project, with impacts arising from its length, repetition, duration, and interaction with other infrastructure projects.	Refer to response below.

CAWS-015	Cumulative Effects	Cable Route Corridor: Construction Uncertainty and Cumulative Effect	6.2 Design uncertainty and deferral 6.2.1 The final cable alignment, extent of trenchless sections, and construction methods will not be confirmed until detailed design. 6.2.2 The ES therefore relies on wide Order Limits, a 25m construction corridor, and interchangeable use of trenching and HDD. 6.2.3 This defers key decisions beyond examination and prevents a clear understanding of where impacts will concentrate or repeat.	The construction of the cable route has been assessed throughout the **ES [APP-052 to APP-265]**, which considers the likely significant construction effects associated with these works. The **ES [APP-052 to APP-265]** assesses the cable route within defined parameters, including limits on working width and trench dimensions, to ensure that a reasonable worst-case scenario is assessed. The detailed design and construction of the cable route would be undertaken within the parameters assessed and authorised by the DCO. Measures to manage and minimise construction effects, including reinstatement of land following installation, are set out in the **Outline Construction Environmental Management Plan (CEMP) [APP-277]**. Requirement 13 in Schedule 2 to the **Draft DCO [APP-016]** secures that prior to the operation of the Scheme, a CEMP must be submitted to and approved by the relevant planning authority, the CEMP must be substantially in accordance with the **Outline CEMP [APP-277]**, and all construction works associated must be carried out in accordance with the approved CEMP. **Requirement 13 in Schedule 2 to the Draft DCO [APP-016]** secures that part of the authorised development can commence until, a CEMP is submitted to and approved by the relevant planning authority. The CEMP must be substantially in accordance with the Outline CEMP, and all construction works associated must be carried out in accordance with the approved CEMP.

CAWS-016	Cumulative Effects	Cable Route Corridor: Construction Uncertainty and Cumulative Effect	6.3 Construction intensity and haul routes 6.3.1 Works involve deep and wide trenches, continuous working corridors, HDD launch pits, heavy plant movements, and temporary haul roads. 6.3.2 The ES treats these impacts as temporary and localised, but does not assess their combined effect when repeated along the full 22 km corridor.	The extent of work required for the Cable Route Corridor is set out in **ES Volume 1, Chapter 3: The Scheme [APP-055]**. Construction phase effects are temporary and localised. The spatial scope and the temporal scope including timescale and assessment years are set out within **ES Volume 1 Chapter 6: EIA Methodology [APP-058]** and further within the individual ES technical chapters **[APP 059 to 072]**. It is not correct that the ES does not assess the combined effect when construction activities are repeated along the corridor because each technical chapter **[APP-059 – APP-072]** has assessed the design identified to be the likely worst-case scenario for that discipline in order to determine effect significance. Taking traffic as an example, the impacts of Cable Route Corridor are assessed within **ES Volume 1, Chapter 13: Transport and Access [APP-065]**. The impact of construction traffic generated by the Cable Route Corridor during construction is set out in Table 13-34. This has assumed that all Cable Route Corridor access points are being used for construction at the same time and has therefore assessed the combined or 'worse case' effect along the full 22 km Cable Route Corridor.

CAWS-017	Cumulative Effects	Cable Route Corridor: Construction Uncertainty and Cumulative Effect	6.4 Drainage, watercourses and cumulative disturbance 6.4.1 The CRC crosses multiple watercourses and headwater systems within a flood-sensitive landscape. 6.4.2 The ES does not assess cumulative disturbance within shared catchments or the interaction of CRC works with other construction activity. 6.4.3 CAWS draws the Examining Authority's attention to relevant experience arising from National Grid's Visual Impact Provision (VIP) programme in the Cotswolds and North Wessex Downs, under which sections of overhead transmission infrastructure have been replaced with underground cable in sensitive rural landscapes. Evidence from the VIP project near Bishops Cannings, provided at Annex E, documents repeated construction-phase surface-water flooding associated with underground cable installation, including focused runoff, surcharge of drainage infrastructure, and off-site impacts beyond the immediate works area. While CAWS does not suggest direct equivalence between schemes, this experience demonstrates that underground cable works in rural headwater environments can materially alter surface-water behaviour during construction. In the context of the proposed Lime Down Cable Route Corridor and its proximity to Whitley, this precedent evidence reinforces the need for a corridor-wide, construction-phase hydrological assessment, rather than	The Cable Route Corridor has been assessed for hydrology, flood risk and drainage effects during construction, including crossings of watercourses and headwater systems. The assessment considers effects beyond the Order limits and concludes that, with the proposed construction approach and drainage controls in place, the Cable Route Corridor would not give rise to increased flood risk or adverse effects on downstream receptors, as set out in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [APP-063]**. Construction phase risks along the corridor, including focused runoff, temporary alteration of flow paths, interaction with drainage infrastructure and potential cumulative disturbance within shared catchments, are assessed and managed through corridor wide drainage principles and controls in **ES Volume 3, Appendix 11-9 Flood Risk Assessment and Drainage Strategy - Lime Down Cable Route Corridor [APP-218]**, supported by secured construction controls in **Outline Construction Environmental Management Plan [APP-277]**. The Applicant notes the experience cited from the VIP programme. While that scheme relates to different infrastructure, construction techniques and local ground and drainage conditions, the importance of robust construction-phase drainage management is recognised. The Lime Down Cable Route Corridor has been assessed on the basis of its specific catchment characteristics and is subject to corridor-wide drainage principles and

			reliance on outline construction methods and site-by-site assumptions.	secured construction controls set out in **Appendix 11-9 Flood Risk Assessment and Drainage Strategy – Lime Down Cable Route Corridor [APP-218]** and the **Outline Construction Environmental Management Plan [APP-277]**, which are designed to prevent focused runoff, surcharge of drainage infrastructure and off-site impacts.

CAWS-018	Cumulative Effects	Cable Route Corridor: Construction Uncertainty and Cumulative Effect	6.5 Corridor-wide cumulative construction effects and evidential sufficiency 6.5.1 The length, phasing and construction programme of the Cable Route Corridor mean that construction impacts do not arise from a single, isolated intervention, but from repeated and sequential works along a 22 km route over an extended period. 6.5.2 Even where a "*worst case*" construction scenario is assumed for an individual section, the Environmental Statement does not assess the effect of repeated worst-case conditions occurring sequentially or concurrently along the corridor, including where multiple sections intersect the same headwater catchments draining towards Shaw and Whitley. 6.5.3 The cumulative effect on downstream receptors arises not only from the magnitude of a single local impact, but from the repetition, duration and interaction of impacts across multiple locations within connected drainage systems, combined with reinstatement lag and overlapping construction activities. 6.5.4 In the absence of a corridor-wide, construction-phase cumulative assessment addressing these mechanisms, the Examining Authority cannot be satisfied that Cable Route Corridor impacts will remain acceptable when assessed in the round, nor that impacts affecting Shaw and Whitley have been adequately identified or mitigated.	It is not correct that the ES does not assess the combined effect when construction activities are repeated along the cable corridor: each technical chapter **[APP-059 – APP-072]** has assessed the design identified to be the likely worst-case scenario for that discipline in order to determine effect significance. Please refer to the traffic example provided above and the hydrology, flood risk and drainage example below. The Cable Route Corridor has been assessed on a corridor wide basis for hydrology, flood risk and drainage effects during construction, recognising the length, phasing and sequential nature of works rather than treating interventions as isolated activities. The assessment considers effects beyond the Order limits and downstream receptors and concludes that the Cable Route Corridor would not give rise to increased flood risk when assessed in the round, as set out in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [APP-063]**. Construction phase risks associated with repeated and sequential works, interaction within connected drainage systems, reinstatement lag and overlapping construction activities are addressed through corridor wide drainage principles and controls rather than reliance on section by section worst case assumptions. These principles are applied consistently along the full length of the corridor in **ES Volume 3, Appendix 11-9 Flood Risk Assessment and Drainage Strategy - Lime Down Cable Route Corridor [APP-218]**, and are designed to ensure no increase in runoff

				rates or volumes leaving the works at any point during construction. Cumulative construction phase controls are secured through the scheme wide construction environmental management framework in **Outline Construction Environmental Management Plan [APP-277]**, which integrates phasing, temporary drainage and water management measures to prevent cumulative downstream effects on receptors such as Shaw and Whitley during the construction period.

CAWS-019	Cumulative Effects	Cable Route Corridor: Construction Uncertainty and Cumulative Effect	6.5.5 Against this evidential background, and in light of the risks, uncertainties and constraints arising from the complex and highly interconnected local hydrology, particularly within sensitive headwater catchments draining towards Shaw and Whitley, CAWS submits that the Applicant should have given substantive consideration to reasonable alternative cable route alignments or connection strategies. This should include alternatives that would reduce construction-phase disturbance within shared catchments, avoid repeated crossings of headwater drainage pathways, and minimise cumulative surface-water exceedance and downstream flood risk. As demonstrated by the National Grid Visual Impact Provision underground cabling project at Bishops Cannings (see Section 6.4.3 and Annex E), construction-phase surface-water flooding and off-site impacts are credible and evidenced outcomes in rural headwater environments. In the absence of a corridor-wide, construction-phase hydrological assessment and a transparent comparison of reasonable alternatives, it has not been demonstrated that the selected Cable Route Corridor represents the least harmful reasonable option in cumulative or hydrological terms.	The hydrology, flood risk and drainage assessment for the Cable Route Corridor demonstrates that the proposed alignment can be constructed and operated without increasing flood risk or causing adverse effects on downstream receptors, without reliance on Flood Zone mapping alone. Construction phase mechanisms, including interaction with drainage features, temporary changes in runoff behaviour and sediment related effects, are explicitly considered and controlled through corridor wide drainage principles and mitigation, as set out in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [APP-063]** and **ES Volume 3, Appendix 11-9 Flood Risk Assessment and Drainage Strategy - Lime Down Cable Route Corridor [APP-218]**. The assessment does not identify a need for alternative cable route alignments on hydrological grounds because the conclusions are not sensitive to the precise routing of the corridor, provided the defined construction controls are applied. These controls are secured through **Outline Construction Environmental Management Plan [APP-277]**, the **Design Principles and Parameters [APP-545]**, and relevant Requirements of the draft Development Consent Order, and include protections for watercourses, management of temporary surface water and sediment, and reinstatement of drainage function. Any works within or near watercourses will be subject to the relevant consenting or permitting regime, or equivalent controls secured through the

				Development Consent Order, and any proposed disapplication of permitting would not remove the substantive protections for the water environment. Accordingly, the submitted evidence demonstrates that the selected Cable Route Corridor represents an acceptable option in hydrological and flood risk terms, with construction phase effects appropriately assessed and controlled.

CAWS-020	Cumulative Effects	Cable Route Corridor: Construction Uncertainty and Cumulative Effect	6.5.6 CAWS further submits that the continued deferral of fundamental matters — including the detailed alignment of the Cable Route Corridor, construction methods, drainage interactions, and mitigation performance under exceedance conditions — has substantive consequences for risk allocation. In a hydrologically complex, downstream-sensitive environment, deferral does not remove or reduce risk; it transfers that risk from the developer to affected communities, downstream receptors, and public services. Where construction-phase hydrological disturbance, surface-water exceedance, contamination pathways and emergency response capacity are central to the acceptability of the scheme, these matters cannot be treated as secondary details to be resolved post-consent. Their deferral prevents the Examining Authority from understanding how cumulative risks would arise, interact and be managed in practice, and therefore from being satisfied that impacts affecting Shaw and Whitley have been adequately assessed or reduced so far as reasonably practicable.	The application follows the NSIP assessment and consenting approach, with assessment of likely significant effects and the controls necessary to avoid off site impacts set at application stage, and detailed design secured through enforceable requirements post consent. For hydrology, flood risk and drainage, the assessment addresses construction phase disturbance, surface water exceedance, contamination pathways and downstream receptors, and concludes that the Scheme, including the Cable Route Corridor, would not increase flood risk or give rise to adverse effects off site when the defined controls are implemented, as set out in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [APP-063]** and **ES Volume 3, Appendix 11-9 Flood Risk Assessment and Drainage Strategy - Lime Down Cable Route Corridor [APP-218]**. Detailed alignment, method statements and exceedance controls are not deferred without control. They are governed by embedded design principles and parameters in **Design Principles and Parameters [APP-545]** and secured through the construction environmental management framework in **Outline Construction Environmental Management Plan [APP-277]**, which provides the mechanism for approving and enforcing detailed construction drainage, working methods near watercourses and pollution prevention measures. This approach allocates risk to the Applicant through enforceable requirements and controls, rather than

				transferring risk to communities or public services. The submitted assessment and secured control framework are sufficient to understand and manage cumulative construction phase hydrological risks for the purposes of the DCO decision.

CAWS-021	Cumulative and In-Combination Effects	Battery Energy Storage System	7.1 Introduction and clustered context 7.1.1 The Lime Down Solar (LDS) proposal includes a large-scale Battery Energy Storage System (BESS) which, although physically located away from Shaw and Whitley, connects into the Melksham Substation, a node that sits at the centre of a highly concentrated cluster of energy infrastructure. As a result, the LDS BESS contributes to cumulative and system-level impacts arising from the intensification of energy infrastructure associated with that node, with implications for communities, environments, and emergency response systems connected to it, including Shaw and Whitley. 7.1.2 While BESS technology plays a role in the transition to low-carbon energy, it is associated with distinct fire, explosion, toxic plume, and contamination hazards, as recognised in national fire service guidance and international incident experience. 7.1.3 The impact of the LDS BESS therefore cannot be assessed in isolation. The safety case must be considered in the context of: • clustered BESS installations (such as those near Shaw and Whitley); • shared hydrological pathways; • finite emergency response capacity; and • interacting cumulative risk mechanisms	The hydrology, flood risk and drainage effects associated with the Battery Energy Storage System have been assessed, including consideration of cumulative effects and interaction with other infrastructure, and the assessment concludes that the BESS would not give rise to increased flood risk or adverse effects on downstream receptors. This assessment is set out in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [APP-063],** which considers effects beyond the Order limits and does not assess the BESS in isolation from its surrounding hydrological context. The BESS drainage design incorporates engineered drainage, containment and pollution control measures to prevent uncontrolled release of water or contaminants to ground or surface waters, in line with national policy and guidance and relevant local policy. The site specific controls and performance basis are set out in **ES Volume 3, Appendix 11-6 Flood Risk Assessment and Drainage Strategy – Lime Down D BESS [APP-215],** and are designed to protect shared hydrological pathways and ensure there is no increase in flood risk or contamination potential.

CAWS-022	Cumulative and In-Combination Effects	Battery Energy Storage System	7.2 Status of NFCC guidance 7.2.1 The Applicant relies extensively on references to "*revised*" or "*updated*" National Fire Chiefs Council (NFCC) guidance within the Outline Battery Safety Management Plan and associated documents. 7.2.2 However, the only formally issued NFCC guidance currently in force is Grid Scale Battery Energy Storage System Planning – Guidance for Fire and Rescue Services, Version 1.0 (November 2022). 7.2.3 The NFCC guidance is explicit that it is intended to: • support safe and effective emergency response; • inform planning decisions; and • ensure risks are reduced so far as reasonably practicable, with public and responder safety as the primary consideration. 7.2.4 Reliance on draft, consultation, or anticipated revisions cannot displace or dilute the requirements of the extant 2022 guidance. Where departures occur, a clear, evidence-based justification is required. In several key respects, such justification has not been provided. 7.2.5 CAWS has set out its concerns regarding the adequacy, status, and application of current NFCC guidance in formal correspondence with the National Fire Chiefs Council, a copy of which is provided at Annex D. That	An **Outline Battery Safety Management Plan (OBSMP) [APP-286]** has been prepared for the Scheme using guidance from Dorset and Wiltshire Fire and Rescue Service (D&WFRS) and incorporating recommendations of the National Fire Chiefs Council. The OBSMP is fully compliant with the original NFCC Guidance and the revised guidance which was published in February 2026. The illustrative BESS enclosure and site layout integrated equipment spacing from a BESS supplier which had conducted LSFT with spacing of 150mm between adjacent BESS enclosures with BESS unit heat flux measurement panels located 2.5 metres from the BESS and an egress heat flux gauge at 1.25m from the BESS (positioned at the front and back side of the initiating BESS enclosure). Fire did not propagate between BESS enclosures and heat flux data at heat flux locations was within limits to demonstrate that fire safety and propagation risks are mitigated. Original NFCC guidance and revised NFCC guidance permit site layout distances to be validated through evidence-based reduction i.e. LSFT (full scale fire test data). Therefore, the Applicant's illustrative BESS site layout 3.5m with 0.9m back-to-back spacing is compliant with fully validated by LSFT. The safety objectives for the design of the BESS site are listed in Section 2.4 of the OBSMP. The OBSMP will be amended at Deadline 1 to fully accommodate the latest BESS safety requirements contained in NFPA 855 (2026) ensuring that any credible risks associated with

			correspondence highlights evidence of escalating and non-linear cumulative risk arising from clustered BESS development, the increasing gap between site-specific guidance and area-wide risk manifestation, and the growing tendency for developers to rely on draft or anticipated revisions to NFCC guidance to justify departures from the extant Version 1.0 (November 2022). While that correspondence is directed to the NFCC, it is material to this Examination insofar as it evidences wider, systemic concerns regarding the interpretation and application of NFCC guidance within the planning process, and reinforces the need for the Examining Authority to assess the Applicant's safety case against formally issued guidance rather than consultation drafts or future intentions.	battery storage are either prevented or fully mitigated if a BESS failure occurs. Section 2.4.2 of the OBSMP stipulates that: "*Final BESS design and site layout will have been validated through mandatory Large Scale Fire Testing (LSFT) and rigorous consequence modelling to minimise the requirement for any D&WFRS intervention in a thermal runaway incident. LSFT must establish minimum equipment spacing distances that demonstrate there is no fire propagation to adjacent BESS enclosures or ESS equipment. D&WFRS intervention in worst case scenarios would typically be limited to boundary cooling of adjacent BESS and Energy Storage System (ESS) units to prevent the fire from spreading. This strategy will be finalised with D&WFRS and be clearly communicated in the Emergency Response Plan (ERP);* *• To ensure that fire, smoke, and any release of toxic gases does not significantly impact site operatives, first responders, and the local community; and* *• To ensure that firewater run-off is contained and tested before release or, if necessary, removed by tanker and treated offsite."* Section 5 of the OBSMP covers all requisite firefighting requirements for the Scheme including fire service access, firefighting water supply, and emergency planning requirements. The Applicant is in the process of agreeing a Statement of Common Ground (SOCG) with D&WFRS to provide assurance that all safety and emergency response requirements are fulfilled.

				The **OBSMP [APP-286]** is secured through Requirement 6 (Battery safety management) in Schedule 2 of the **Draft DCO [APP-016]**, which provides that Work No. 2 must not commence until a Battery Safety Management Plan has been submitted to and approved by the relevant planning authority. The approved plan must be substantially in accordance with the Outline Battery Safety Management Plan. The Draft DCO also requires the relevant planning authority to consult with Dorset and Wiltshire Fire and Rescue Service and the Environment Agency before determining the application, and that the Battery Safety Management Plan must be implemented as approved.

CAWS-023	Cumulative and In-Combination Effects	Battery Energy Storage System	7.3 Site layout, spacing, and escalation risk 7.3.1 NFCC guidance states that a minimum separation distance of 6 metres between BESS units should be provided unless a competent, evidence-based fire engineering case demonstrates that reduced spacing will not increase fire propagation risk. 7.3.2 The LDS BESS layout assumes significantly reduced separation distances, with final spacing deferred to post-consent detailed design and future testing. 7.3.3 This approach: • reverses the NFCC precautionary logic; • relies on assumed performance rather than demonstrated outcomes; and • leaves the Examining Authority without assurance that escalation and propagation risks are acceptably managed at the consent stage. 7.3.4 The assessment is site-specific and does not address how reduced spacing interacts with clustered BESS development, where multiple installations exist within a limited geographic area and are connected to shared infrastructure and emergency response resources.	An **Outline Battery Safety Management Plan (OBSMP) [APP-286]** has been prepared for the Scheme using guidance from Dorset and Wiltshire Fire and Rescue Service (D&WFRS) and incorporating recommendations of the National Fire Chiefs Council. The OBSMP is fully compliant with the original NFCC Guidance and the revised guidance which was published in February 2026. The illustrative BESS enclosure and site layout integrated equipment spacing from a BESS supplier which had conducted LSFT with spacing of 150mm between adjacent BESS enclosures with BESS unit heat flux measurement panels located 2.5 metres from the BESS and an egress heat flux gauge at 1.25m from the BESS (positioned at the front and back side of the initiating BESS enclosure). Fire did not propagate between BESS enclosures and heat flux data at heat flux locations was within limits to demonstrate that fire safety and propagation risks are mitigated. Original NFCC guidance and revised NFCC guidance permit site layout distances to be validated through evidence-based reduction i.e. LSFT (full scale fire test data). Therefore, the Applicant's illustrative BESS site layout 3.5m with 0.9m back-to-back spacing is compliant with fully validated by LSFT. As now mandated under NFPA 855 (2026) the Applicant will only be able to select a BESS system that has undertaken Large Scale Fire Testing (LSFT). At the detailed design stage, the selected BESS LSFT data will be leveraged to fully inform inputs for risk

				assessment tools which will be utilised together with detailed consequence modelling to provide a comprehensive site operations and emergency response safety audit, this is stipulated in the OBSMP pre-construction requirements (Section 6). The Applicant is in the process of agreeing a Statement of Common Ground (SOCG) with D&WFRS to provide assurance that all safety and emergency response requirements are fulfilled. The **OBSMP [APP-286]** is secured through Requirement 6 (Battery safety management) in Schedule 2 of the **Draft DCO [APP-016]**, which provides that Work No. 2 must not commence until a Battery Safety Management Plan has been submitted to and approved by the relevant planning authority. The approved plan must be substantially in accordance with the Outline Battery Safety Management Plan. The Draft DCO also requires the relevant planning authority to consult with Dorset and Wiltshire Fire and Rescue Service and the Environment Agency before determining the application, and that the Battery Safety Management Plan must be implemented as approved.

CAWS-024	Other Environmental Matters	Battery Energy Storage System	7.4 Fire scenario assumptions and plume modelling 7.4.1 The Applicant's Fire Emissions Modelling is based on a single-container fire scenario, assuming that detection, suppression, and layout design prevent propagation beyond one enclosure. 7.4.2 NFCC guidance, by contrast, requires emergency planning to address credible worst-case scenarios, including escalation, prolonged incidents, vapour cloud release, and defensive firefighting strategies. 7.4.3 The modelling further relies on: • 1-hour averaging periods, despite acknowledging that peak conditions may occur over shorter timescales; • occupational exposure benchmarks for particulates rather than public-health-based thresholds; and • incomplete background datasets for certain toxic gases. 7.4.4 While such assumptions may be defensible for a single isolated site, they are not robust when considered cumulatively, where: • incident duration may be prolonged; • emergency response may be delayed or resource-constrained; and • concurrent or sequential incidents cannot be excluded.	The Applicant has followed National Fire Chiefs Council (NFCC) guidance and commissioned a Plume Assessment Study to model toxic gas emissions and visibility impacts from a BESS fire on all sensitive receptors within a 1km radius of the BESS area. The fire emissions modelled in the report were based upon recent UK Health Security Agency (UKHSA) requests for DCO BESS projects which explore both immediate air quality impacts together with annual UK air quality requirements. The UKHSA is a statutory consultee for the Scheme and has confirmed that they are satisfied with the Applicant's submitted documentation and Plume Assessment Study methodology and results. Six worst case BESS fire locations (i.e. locations within the BESS Area closest to sensitive receptors) have been modelled as depicted in **ES Volume 2, Figure 15-5: Battery Energy Storage System Fire Emissions Study Area [APP-239].** The Concentrations of carbon monoxide (CO), formaldehyde, hydrogen chloride (HCl), hydrogen cyanide (HCN), hydrogen fluoride (HF), ammonia (NH_3), nitrogen dioxide (NO2) and particulates from a potential BESS fire have been modelled using an air quality dispersion model to determine the likely effects on human health. A high-level visibility assessment has also been undertaken using the modelled particulates results to determine the effect of BESS fire emissions on visibility on the local road and rail network to inform the **Outline Battery Safety Management Plan (OBSMP) [APP-286].** The Plume

				Assessment Study has concluded that there are no significant toxic emission or visibility impacts at all sensitive receptor locations. The Applicant has also committed to commissioning an additional Plume Analysis Study at the detailed design stage as stipulated in Section 5.5.9 of the OBSMP and secured through the DCO: *"..at the detailed design stage a BESS system and site specific Plume Analysis study will be conducted to assess the environmental impact of a site incident to sensitive receptors within a 1 km radius. Toxic gas emissions to sensitive receptors must be below relevant public health exposure limit guidelines when the battery system of a BESS is fully consumed (burnt out), production of Particulate Matter (PM) and a visibility impact assessment on any transport links within a 1 km radius of the BESS area will also be included. The ERP produced at the detailed design stage (template outlined in Section 5.4.9 - 5.4.11) will incorporate all necessary emergency response procedures and actions based upon thermal runaway test data supplied by the BESS system provider."* As now mandated under NFPA 855 (2026) the Applicant will only be able to select a BESS system that has undertaken Large Scale Fire Testing (LSFT). At the detailed design stage, the selected BESS LSFT data will be leveraged to fully inform inputs for risk assessment tools which will be utilised together with detailed consequence modelling to provide a comprehensive site operations and emergency response

				safety audit, this is stipulated in the OBSMP pre-construction requirements (Section 6). The objective of the test is to evaluate the thermal exposure impacts from a developed BESS enclosure, to determine propagation risk to adjacent BESS or equipment. Testing also defines the length of burn, duration of Peak Heat Release Rate, maximum burn temperatures, etc. Final comprehensive risk assessment reports, BESS design and site-specific consequence modelling, and detailed Emergency Response Plans (ERPs) can only be drafted when based upon the specific BESS design selected at the detailed design stage. Key safety content requires that all equipment specifications within the BESS area are defined, battery system operating limits and test data are fully defined, and the BESS failure protection system is defined. Incident response tactics require significant test data and rigorous consequence modelling from the specific BESS design to develop safe protocols for incident response. Section 5.4.9 – 5.4.11 of the OBSMP stipulates that the ERP will follow NFCC and NFPA 855 (2026) guidelines and stipulates the minimum content that an ERP must contain, including: *"Emergency procedures for all credible hazards and risks, including building, infrastructure and vehicle fire, wildfires, impacts on local respondents, impacts on transport infrastructure."* All risk assessments to be conducted at detailed design for BESS projects required by the Health and Safety Executive (HSE) to assess fire and

				explosion risk are stipulated in Section 6.1.5. Further explosion prevention, mitigation, and safety requirements for the Scheme are stipulated in the OBSMP Sections: 1.1.6 – 1.1.7, 4.1.3 – 4.1.10, 4.1.18, 4.1.27, 4.1.30 - 4.1.33, 4.1.36 – 4.1.39, 5.1.3, and 5.1.6. Section 5 of the OBSMP covers all requisite firefighting requirements for the Scheme including fire service access, firefighting water supply, and emergency planning requirements. The Applicant is in the process of agreeing a Statement of Common Ground (SOCG) with D&WFRS to provide assurance that all safety and emergency response requirements are fulfilled.

CAWS-025	Other Environmental Matters	Battery Energy Storage System	7.5 Firewater, contamination, and hydrological connectivity 7.5.1 NFCC guidance requires explicit consideration of water supply, firewater runoff, and environmental protection, including containment and management of contaminated water. 7.5.2 CAWS has demonstrated that Shaw and Whitley sit within a highly interconnected headwater drainage network that feeds into the River Avon at Melksham. Surface water, firewater and any associated contaminants released at the LDS BESS site would be conveyed via Gauze Brook into the River Avon, while South Brook, which flows directly through Shaw and Whitley, also discharges into the same river system. These shared downstream pathways create functional hydrological connectivity between the LDS BESS and Shaw and Whitley, giving rise to cumulative contamination and water-quality risks that cannot be understood or mitigated on a site-by-site basis. 7.5.3 A credible cumulative pathway therefore exists: thermal runaway → toxic plume → contaminated firewater → headwater drainage → downstream receptors 7.5.4 The same hydrological characteristics that increase flood risk — shallow soils, rapid runoff response, connected ditches, and limited attenuation capacity — also facilitate	An **Outline Battery Safety Management Plan (OBSMP) [APP-286]** has been prepared for the Scheme using guidance from Dorset and Wiltshire Fire and Rescue Service and incorporating recommendations of the National Fire Chiefs Council. The safety objectives for the design of the BESS site are listed in Section 2.4 of the OBSMP. The OBSMP will be amended at Deadline 1 to fully accommodate the latest BESS safety requirements contained in NFPA 855 (2026) ensuring that any credible risks associated with battery storage are either prevented or fully mitigated if a BESS failure occurs. Section 2.4.2 of the OBSMP stipulates that: *"Final BESS design and site layout will have been validated through mandatory Large Scale Fire Testing (LSFT) and rigorous consequence modelling to minimise the requirement for any D&WFRS intervention in a thermal runaway incident. LSFT must establish minimum equipment spacing distances that demonstrate there is no fire propagation to adjacent BESS enclosures or ESS equipment. D&WFRS intervention in worst case scenarios would typically be limited to boundary cooling of adjacent BESS and Energy Storage System (ESS) units to prevent the fire from spreading. This strategy will be finalised with D&WFRS and be clearly communicated in the Emergency Response Plan (ERP);* *• To ensure that fire, smoke, and any release of toxic gases does not significantly impact site operatives, first responders, and the local community; and*

			contaminant conveyance. 7.5.5 The LDS application does not provide: • a satisfactory catchment-scale assessment of contaminated firewater flows; • analysis of exceedance or failure conditions during prolonged incidents; or • assessment of how cumulative BESS development alters contamination risk beyond the Order Limits. 7.5.6 In the absence of a detailed catchment-scale contamination and water-quality risk assessment, the Examining Authority cannot be satisfied that risks to Gauze Brook, the River Avon, or connected downstream receptors have been adequately identified, assessed, or mitigated.	• *To ensure that firewater run-off is contained and tested before release or, if necessary, removed by tanker and treated offsite."* Section 5 of the OBSMP covers all requisite firefighting requirements for the Scheme including fire service access, firefighting water supply, and emergency planning requirements and is fully compliant with NFCC guidance. The Applicant is currently drafting a Statement of Common Ground (SOCG) with the Environment Agency (EA) on Scheme environmental protection issues including the BESS area drainage strategy. The agreed strategy document will be appended to the OBSMP at Deadline 1, to provide further assurance that all water pollution risks from a BESS fire are fully mitigated. The EA is a statutory consultee for the OBSMP and drainage strategies and must approve the final BSMP and drainage design at detailed design before construction of the BESS commences. The **OBSMP [APP-286]** is secured through Requirement 6 (Battery safety management) in Schedule 2 of the **Draft DCO [APP-016],** which provides that Work No. 2 must not commence until a Battery Safety Management Plan has been submitted to and approved by the relevant planning authority. The approved plan must be substantially in accordance with the Outline Battery Safety Management Plan. The Draft DCO also requires the relevant planning authority to consult with Dorset and Wiltshire Fire and Rescue Service and the Environment Agency before determining the

				application, and that the Battery Safety Management Plan must be implemented as approved. Firewater runoff and contamination pathways from the BESS have been considered within the hydrology, flood risk and drainage assessment, including the potential for contaminated water to reach receiving waters and downstream receptors via connected watercourses. The assessment concludes that, with the proposed design and secured controls in place, the BESS would not give rise to adverse effects on water quality or increase risk to downstream receptors, as set out in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [APP-063]** and **ES Volume 3, Appendix 11-6 Flood Risk Assessment and Drainage Strategy – Lime Down D BESS [APP-215].** The representation describes a pathway from a BESS incident to contaminated firewater entering the drainage network. The BESS strategy is specifically designed to prevent uncontrolled release of contaminated water to ground or surface waters, using engineered drainage, containment and isolation measures that break the pathway to off site receptors, with the performance basis and controls set out in **ES Volume 3, Appendix 11-6 Flood Risk Assessment and Drainage Strategy – Lime Down D BESS [APP-215].** The submitted assessment therefore demonstrates that risks to Gauze Brook, the River Avon and connected downstream receptors are

				appropriately identified and controlled within the application.

CAWS-026	Other Environmental Matters	Battery Energy Storage System	7.6 Policy and decision-making implications 7.6.1 JMNP2 Policy 2 requires renewable energy infrastructure not to create unacceptable safety impacts, and Policy 12 requires protection of green and blue infrastructure networks. 7.6.2 National Policy Statements EN-1 and EN-3 require decision-makers to be satisfied that energy infrastructure is safe, that risks are adequately assessed, and that impacts beyond the site boundary are properly considered. 7.6.3 The NFCC guidance constitutes an important and relevant matter in this context. Where an application departs from that guidance, or addresses it only partially or prospectively, equivalent or superior protection must be demonstrated. 7.6.4 In the present case, reliance on: • site-specific assumptions; • future design refinement; and • non-binding draft guidance does not provide a sufficiently robust basis for concluding that BESS fire, plume, contamination, and escalation risks are acceptable when considered cumulatively. 7.6.5 This approach is consistent with appeal decisions such as Pound Road, Hawkchurch (APP/U1105/W/22/3312300), which confirm that, where the scale of harm is	The application includes an assessment of hydrology, flood risk and drainage effects associated with the Battery Energy Storage System, including potential off site impacts and water quality risks, and concludes that the Scheme would not increase flood risk or give rise to adverse effects on the water environment. This is set out in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [APP-063]**, supported by the BESS specific drainage, containment and pollution control strategy in **ES Volume 3, Appendix 11-6 Flood Risk Assessment and Drainage Strategy – Lime Down D BESS [APP-215].** The BESS water management approach is not reliant on unbound future refinement. The assessed drainage, containment and exceedance controls are defined in the submitted Flood Risk Assessment and Drainage Strategy for the BESS and will be delivered within the consented design envelope. The parameters governing detailed design are secured through **Design Principles and Parameters [APP-545],** and detailed drainage and pollution control measures will be subject to approval by the relevant consultees through Development Consent Order requirements, providing an enforceable mechanism for scrutiny and control prior to construction. The Applicant's **Outline Battery Safety Management Plan (OBSMP) [APP-286]** is fully compliant with NFCC Guidance for the Scheme. The OBSMP covers all credible fire, explosion, toxic emission, and pollution risks. As now mandated

			high and receptors are sensitive, fire safety is a determinative issue and not a matter capable of resolution through post-consent conditions. 7.6.6 Further, the Department for Energy Security and Net Zero's guidance "*Health and safety in grid scale electrical energy storage systems*" (April 2024) confirms that planning decisions should be taken only with a complete assessment of credible worst-case risks to both the project and its surroundings, including fire, explosion, toxic gas release and contaminated runoff. Failure to grapple with this guidance, which constitutes a material consideration, would undermine the lawfulness and robustness of decision-making.	under NFPA 855 (2026) the Applicant will only be able to select a BESS system that has undertaken Large Scale Fire Testing (LSFT). At the detailed design stage, the selected BESS LSFT data will be leveraged to fully inform inputs for risk assessment tools which will be utilised together with detailed consequence modelling to provide a comprehensive site operations and emergency response safety audit, this is stipulated in the OBSMP pre-construction requirements (Section 6). The **OBSMP [APP-286]** is secured through Requirement 6 (Battery safety management) in Schedule 2 of the **Draft DCO [APP-016],** which provides that Work No. 2 must not commence until a Battery Safety Management Plan has been submitted to and approved by the relevant planning authority. The approved plan must be substantially in accordance with the Outline Battery Safety Management Plan. The Draft DCO also requires the relevant planning authority to consult with Dorset and Wiltshire Fire and Rescue Service and the Environment Agency before determining the application, and that the Battery Safety Management Plan must be implemented as approved. An assessment of the effects of the Scheme on air quality is provided in **ES Volume 1, Chapter 15: Air Quality [APP-067]**, which considers potential air quality impacts during construction, operation and decommissioning. The assessment examines dust emissions, vehicle emissions, non-road mobile machinery emissions, back-up generator

				emissions and emissions associated with a potential BESS fire. Supporting technical assessments are provided in **ES Volume 3, Appendix 15-1: Construction Dust Methodology and Assessment [APP-238]** and **ES Volume 3, Appendix 15-2: BESS Fire Emissions Modelling [APP-239]**. The assessment concludes that, with embedded mitigation measures in place, the Scheme would not give rise to significant adverse air quality effects at human or ecological receptors.

CAWS-027	Cumulative Effects	Battery Energy Storage System	7.7 Conclusion 7.7.1 CAWS submits that the LDS application contains a material evidential gap between the requirements and principles of the National Fire Chiefs Council (NFCC) Grid Scale BESS Guidance (Version 1.0, November 2022) and the Applicant's site-led safety case, which is framed predominantly around single-container incidents and scheme-specific mitigation. 7.7.2 That gap is compounded by the fact that, although the LDS BESS is geographically distant from Shaw and Whitley, it is functionally and opera Substation, a node at the centre of a highly concentrated cluster of energy infrastructure. In this context, cumulative impacts arise not from proximity alone, but from the intensification of system-level risk, emergency response demand, and environmental consequence associated with that shared infrastructure. 7.7.3 The contamination and hydrological pathways arising from BESS fire and firewater runoff are set out in detail at Section 7.5 and are not repeated here. 7.7.4 In the absence of: • a cumulative BESS major accident assessment addressing clustered and system-level risk; • a catchment-scale assessment of contaminated firewater mobilisation and downstream receptors; and	An **Outline Battery Safety Management Plan (OBSMP) [APP-286]** has been prepared for the Scheme using guidance from Dorset and Wiltshire Fire and Rescue Service (D&WFRS) and incorporating recommendations of the National Fire Chiefs Council. The OBSMP is fully compliant with the original NFCC Guidance and the revised guidance which was published in February 2026. The revised guidance integrates revisions and refinements to the 2024 draft which were already included in the OBSMP, except that the Applicant will still integrate a 10m vegetation clearance distance around BESS enclosures. The illustrative BESS enclosure and site layout integrated equipment spacing from a BESS supplier which had conducted LSFT with spacing of 150mm between adjacent BESS enclosures with BESS unit heat flux measurement panels located 2.5 metres from the BESS and an egress heat flux gauge at 1.25m from the BESS (positioned at the front and back side of the initiating BESS enclosure). Fire did not propagate between BESS enclosures and heat flux data at heat flux locations was within limits to demonstrate that fire safety and propagation risks are mitigated. Original NFCC guidance and revised NFCC guidance permit site layout distances to be validated through evidence-based reduction i.e. LSFT (full scale fire test data). Therefore, the Applicant's illustrative BESS site layout 3.5m with 0.9m back-to-back spacing is compliant with fully validated by LSFT.

			• evidence of cluster-wide emergency response planning aligned with formally issued NFCC guidance, the Examining Authority cannot be satisfied that BESS-related risks have been reduced so far as reasonably practicable, or that the proposal complies with national policy and guidance when impacts are assessed in the round and cumulatively.	The OBSMP already incorporates rigorous explosion prevention and mitigation stipulates based upon NFPA 855 requirements which are now integrated into the 2026 NFCC guidance. Site design ensures that D&WFRS would not have to travel or operate in a smoke plume / vapour cloud. The OBSMP specifies that the indicative site design will accommodate as follows: *"The BESS Area will contain a minimum of two firefighting water storage units of no less than 228,000 litres in capacity, capable of delivering 1900 litres per minute for 4 hours (exceeding NFCC guidance)."* As now mandated under NFPA 855 (2026) the Applicant will only be able to select a BESS system that has undertaken Large Scale Fire Testing (LSFT). At the detailed design stage, the selected BESS LSFT data will be leveraged to fully inform inputs for risk assessment tools which will be utilised together with detailed consequence modelling to provide a comprehensive site operations and emergency response safety audit, this is stipulated in the OBSMP pre-construction requirements (Section 6). Section 5.3.2 stipulates that: *"The firefighting water requirement will be fully assessed at the detailed design stage based upon BESS fire and explosion test data by an independent Fire Protection Engineer and water storage volumes will be agreed with D&WFRS during detailed design."* The Applicant is in the process of agreeing a Statement of Common Ground

				(SOCG) with D&WFRS to provide assurance that all safety and emergency response requirements are fulfilled. Potential hydrology, flood risk and drainage effects associated with the Battery Energy Storage System, including contamination pathways and firewater runoff, have been assessed and the assessment concludes that the Scheme would not give rise to increased flood risk or adverse effects on the water environment, including beyond the Order limits. This is set out in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [APP-063]** and the BESS specific assessment in **ES Volume 3, Appendix 11-6 Flood Risk Assessment and Drainage Strategy – Lime Down D BESS [APP-215].** The BESS drainage and water management measures include engineered containment and pollution control to prevent uncontrolled release to ground or surface waters, and these measures will be secured and subject to approval by the relevant consultees through Development Consent Order requirements prior to construction.

CAWS-028	Cumulative Effects	Emergency Response Capacity	8. Emergency Response Capacity 8.1 Rural emergency services have finite capacity. BESS incidents are prolonged and resource-intensive, including scenarios where toxic plume behaviour constrains safe access, appliance positioning or sustained deployment, further compounding response limitations within a clustered infrastructure context. 8.2 The application does not provide cumulative emergency response modelling or evidence of preparedness for clustered incidents. 8.3 Risk is therefore transferred from developers to communities and public services. 8.4 CAWS notes that information obtained through Freedom of Information (FOI) requests indicates that Dorset & Wiltshire Fire and Rescue Service (DWFRS) preparedness to respond to a BESS incident remains uncertain, notwithstanding the Applicant's stated engagement with the Service. The FOI responses indicate that detailed, site-specific operational planning, training, and resourcing arrangements for BESS incidents are either undeveloped or contingent, and that reliance is placed on evolving guidance and future engagement rather than established operational readiness. In this context, Applicant–FRS discussions cannot be treated as evidence that emergency response capacity is assured. Rather, they highlight a material uncertainty as to whether	In relation to the Lime Down project, a comprehensive Cumulative and In-Combination Effects Assessment has been undertaken in accordance with Planning Inspectorate Advice Note 17 and the relevant requirements of NPS EN-1, NPS EN-3 and NPS EN-5, as set out within **ES Volume 1, Chapter 21: In-Combination and Cumulative Effects [APP-073]** and its associated Appendices **[APP-264].** Interaction with proposed or consented, but not yet constructed, developments has been fully assessed across the technical topics **[APP-059 – APP-072**], with a summary of these assessments presented within **ES Volume 1, Chapter 21: In-Combination and Cumulative Effects [APP-073].** Existing schemes are captured within the baseline environment, and the four-stage cumulative assessment methodology is described in **ES Volume 1, Chapter 6 EIA Methodology [APP-058].** The list of developments included within the cumulative assessment was reviewed and refined in consultation with Wiltshire Council. A cumulative major accident assessment (including Building Failure, Fire and Associated Explosions) has also been undertaken in **ES Volume 1, Chapter 20: Other Environmental Matters [APP-072].** This assessment concludes that with the mitigation measures listed in Table 20-19 to reduce the risk of fire and other shortlisted events, no cumulative effects are predicted. Moreover, An **Outline Battery Safety Management Plan (OBSMP) [APP-286]**

			DWFRS currently has the capability, capacity, and defined operational framework to respond effectively to a prolonged or complex BESS incident within a clustered energy infrastructure environment. This uncertainty is directly relevant to the Examination, as emergency response readiness is a core component of risk acceptability and cannot be deferred beyond the consent stage.	has been submitted with the Application. The OBSMP confirms that a robust and validated Emergency Response Plan (ERP) will be developed at the detailed design stage in consultation with Dorset & Wiltshire Fire and Rescue Service. Section 5.4 of the OBSMP sets out the typical emergency response protocols, procedures and safety information that will be included in the ERP. The ERP will apply across all phases of the Scheme, including construction, operation and decommissioning. These measures would further ensure that in the unlikely event a BESS fire broke out, nearby Schemes would remain unaffected. The Applicant's OBSMP is fully compliant with NFCC Guidance for the Scheme. The OBSMP covers all credible fire, explosion, toxic emission, and pollution risks. As now mandated under NFPA 855 (2026) the Applicant will only be able to select a BESS system that has undertaken Large Scale Fire Testing (LSFT). At the detailed design stage, the selected BESS LSFT data will be leveraged to fully inform inputs for risk assessment tools which will be utilised together with detailed consequence modelling to provide a comprehensive site operations and emergency response safety audit, this is stipulated in the OBSMP pre-construction requirements (Section 6). Section 2.4.2 of the OBSMP stipulates that: *"Final BESS design and site layout will have been validated through mandatory Large Scale Fire Testing (LSFT) and rigorous consequence modelling to minimise the requirement for*

				any D&WFRS intervention in a thermal runaway incident. LSFT must establish minimum equipment spacing distances that demonstrate there is no fire propagation to adjacent BESS enclosures or ESS equipment. D&WFRS intervention in worst case scenarios would typically be limited to boundary cooling of adjacent BESS and Energy Storage System (ESS) units to prevent the fire from spreading. This strategy will be finalised with D&WFRS and be clearly communicated in the Emergency Response Plan (ERP); *• To ensure that fire, smoke, and any release of toxic gases does not significantly impact site operatives, first responders, and the local community; and* *• To ensure that firewater run-off is contained and tested before release or, if necessary, removed by tanker and treated offsite."* The Applicant is in the process of agreeing a Statement of Common Ground (SOCG) with D&WFRS to provide assurance that all safety and emergency response requirements are fulfilled. D&WFRS will have separate Risk Management and Site Specific Risk Information (SSRI) plans for every BESS facility in the area, the Applicant's OBSMP section 5.4 covers information that must be provided for this documentation in addition to ERPs information requirements. The **OBSMP [APP-286]** is secured through Requirement 6 (Battery safety management) in Schedule 2 of the **Draft DCO [APP-016],** which provides that Work No. 2 must not commence until a Battery Safety Management Plan has

				been submitted to and approved by the relevant planning authority. The approved plan must be substantially in accordance with the Outline Battery Safety Management Plan. The Draft DCO also requires the relevant planning authority to consult with Dorset and Wiltshire Fire and Rescue Service and the Environment Agency before determining the application, and that the Battery Safety Management Plan must be implemented as approved.

CAWS-029	Cumulative Effects	Landscape, Heritage, and Settlement Identity	9. Landscape, Heritage, and Settlement Identity 9.1 Assessments are largely asset-by-asset and do not address cumulative coalescence. 9.2 The cumulative effect of LDS contributes to the erosion of Shaw and Whitley's separate rural identity, engaging JMNP2 Policies 18 and 19.	The potential effects of the Scheme on cultural heritage assets,including cumulative effects, are assessed in **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, supported by **ES Volume 3, Appendix 12-1: Heritage Statement [APP-219].** The assessment identifies heritage assets, considers their significance and the contribution of setting, and evaluates effects during construction, operation and decommissioning phases of the Scheme. The cumulative impacts have been assessed with consideration to the Scheme and other proposed and identified developments are assessed in Section 12.12 of **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**. This approach is in line with the methodology detailed in Section 6.8 of **ES Volume 1, Chapter 6: Environmental Impact Assessment Methodology [APP-058],** consultation undertaken with Wiltshire Council (see Section 12.2 of **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, as well as guidance and policy (i.e. Paragraph 56 of Historic England Advice Note 15: Commercial Renewable Energy Development and the Historic Environment and Nationally Significant Infrastructure Projects: Advice on Cumulative Effects Assessment). Table 8-31 in the LVIA in **ES Volume 1, Chapter 38: Landscape and Visual[APP060**] identifies the 'Included Cumulative Development Sites' assessed in the Cumulative Landscape and Visual Assessment. The list includes, solar and BESS schemes within the 10km extended

				Cumulative Study Area, but does not include residential, commercial, road infrastructure, and other types of development.
CAWS-030	Cumulative and In-Combination Effects	Melksham Substation and System-Level Vulnerability	10. Melksham Substation and System-Level Vulnerability 10.1 LDS further intensifies reliance on Melksham Substation as a regional hub. 10.2 No system-level resilience or cascading failure assessment is provided, contrary to EN-1.	The Applicant confirms that the Existing National Grid Melksham Substation was identified as the point of connection following extensive engagement with National Grid. This selection was based on available capacity, network resilience, and strategic grid planning. High-voltage electricity transmission at 400kV is specifically designed to enable the efficient bulk transfer of energy across the NETS, allowing any surplus generated by the Scheme to be used to cover shortfalls elsewhere in the national network. Contrary to the suggestion that the Scheme increases vulnerability, the

				Statement of Need [APP-266] explains that connecting to the NETS ensures the Scheme does not impact the feasibility or timing of distribution network connections required for local growth. Furthermore, the inclusion of a Battery Energy Storage System (BESS) provides essential flexibility and improves grid reliability by enabling rapid response to network fluctuations and supporting grid balancing. Under the framework of NPS EN-1, the responsibility for maintaining the operational integrity and preventing cascading failures of the national network rests with the National Energy System Operator (NESO). The Scheme has been integrated into NESO's connection queue reprioritisation process, with the solar prioritised as a Gate 2 Phase 1 connection (connecting by 2030). This demonstrates that the Scheme has undergone rigorous technical review by the statutory body responsible for national network stability. The Applicant is currently engaging with National Grid Electricity Transmission to progress a Statement of Common Ground (SoCG) to ensure all technical interfaces and protective provisions are agreed.

CAWS-031	Cumulative and In-Combination Effects	Evidence Base and Cumulative Impact	11. Evidence Base and Cumulative Impact 11.1 CAWS's evidence demonstrates that risks are cumulative, interactive, and capacity-limited. 11.2 Failure to engage with this evidence undermines decision-making robustness. 11.3 CAWS notes that the Applicant has submitted a High-Level Electromagnetic Field Assessment concluding that predicted EMF levels are below applicable public exposure limits. CAWS does not pursue EMF as a residual health risk. CAWS's concern remains focused on cumulative system behaviour, construction-phase risk, and cluster-scale safety, environmental and emergency response capacity.	Refer below. The Cumulative Assessment is set out within each of the technical assessments **[APP-059 - APP-072]** with a summary of each of these assessments provided within **Environmental Statement Chapter 21 In-Combination and Cumulative Effects [APP-073]**.

CAWS-032	Cumulative and In-Combination Effects	Requests to the Examining Authority	12. Requests to the Examining Authority 12.1 CAWS respectfully requests that the Examining Authority require: • a construction-phase, catchment-scale hydrology and flood-risk assessment; • a corridor-wide cumulative construction impact assessment; • a cumulative BESS major accident and emergency response assessment; • a firewater containment and contamination management strategy; • a cumulative landscape and settlement-setting assessment; • a cumulative public health assessment; • a system-level resilience assessment for Melksham Substation. 12.2 CAWS further submits that any additional assessments or information required by the Examining Authority should explicitly include Shaw and Whitley within their scope, having regard to their down-slope, downstream, and down-network position relative to the Lime Down proposal and associated infrastructure. Assessments that are confined to the immediate Order Limits or the LDS site alone would not address the cumulative impact pathways identified in this Relevant Representation and would therefore be insufficient to inform a robust assessment of effects on affected communities.	The application already includes assessment and control of hydrology, flood risk and drainage effects during construction and operation, including consideration of effects beyond the Order limits and on downstream receptors such as Shaw and Whitley. This is set out in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [APP-063]**, supported by the Flood Risk Assessment and Drainage Strategy suite which demonstrates no increase in runoff rates or volumes leaving the Site. The NSIP process secures detailed design and construction controls through enforceable Development Consent Order requirements. Construction phase drainage, soil and pollution controls will be delivered through the construction environmental management framework in **Outline Construction Environmental Management Plan [APP-277]**, with detailed method statements and drainage measures subject to approval by the relevant consultees prior to commencement of works. On this basis, the submitted evidence and secured control framework provide a sufficient basis for the Examining Authority to consider hydrology, flood risk and drainage effects as part of the DCO decision. A cumulative major accident assessment (including Building Failure, Fire and Associated Explosions) has also been undertaken in **ES Volume 1, Chapter 20: Other Environmental Matters [APP-072].** This assessment concludes that with the mitigation measures listed in

				Table 20-19 to reduce the risk of fire and other shortlisted events, no cumulative effects are predicted. Moreover, An **Outline Battery Safety Management Plan (OBSMP) [APP-286]** has been submitted with the Application. The OBSMP confirms that a robust and validated Emergency Response Plan (ERP) will be developed at the detailed design stage in consultation with Dorset & Wiltshire Fire and Rescue Service. Section 5.4 of the OBSMP sets out the typical emergency response protocols, procedures and safety information that will be included in the ERP. The ERP will apply across all phases of the Scheme, including construction, operation and decommissioning. These measures would further ensure that in the unlikely event a BESS fire broke out, nearby Schemes would remain unaffected. The Applicant's OBSMP is fully compliant with NFCC Guidance for the Scheme. The OBSMP covers all credible fire, explosion, toxic emission, and pollution risks. As now mandated under NFPA 855 (2026) the Applicant will only be able to select a BESS system that has undertaken Large Scale Fire Testing (LSFT). At the detailed design stage, the selected BESS LSFT data will be leveraged to fully inform inputs for risk assessment tools which will be utilised together with detailed consequence modelling to provide a comprehensive site operations and emergency response safety audit, this is stipulated in the OBSMP pre-construction requirements (Section 6).

				Section 2.4.2 of the OBSMP stipulates that: *"Final BESS design and site layout will have been validated through mandatory Large Scale Fire Testing (LSFT) and rigorous consequence modelling to minimise the requirement for any D&WFRS intervention in a thermal runaway incident. LSFT must establish minimum equipment spacing distances that demonstrate there is no fire propagation to adjacent BESS enclosures or ESS equipment. D&WFRS intervention in worst case scenarios would typically be limited to boundary cooling of adjacent BESS and Energy Storage System (ESS) units to prevent the fire from spreading. This strategy will be finalised with D&WFRS and be clearly communicated in the Emergency Response Plan (ERP); • To ensure that fire, smoke, and any release of toxic gases does not significantly impact site operatives, first responders, and the local community; and • To ensure that firewater run-off is contained and tested before release or, if necessary, removed by tanker and treated offsite."* The Applicant is in the process of agreeing a Statement of Common Ground (SOCG) with D&WFRS to provide assurance that all safety and emergency response requirements are fulfilled. The Applicant is currently drafting a Statement of Common Ground (SOCG) with the Environment Agency (EA) on Scheme environmental protection issues including the BESS area drainage strategy. The agreed strategy document

				will be appended to the OBSMP at Deadline 1, to provide further assurance that all water pollution risks from a BESS fire are fully mitigated. The EA is a statutory consultee for the OBSMP and drainage strategies and must approve the final BSMP and drainage design at detailed design before construction of the BESS commences. The **OBSMP [APP-286]** is secured through Requirement 6 (Battery safety management) in Schedule 2 of the **Draft DCO [APP-016]**, which provides that Work No. 2 must not commence until a Battery Safety Management Plan has been submitted to and approved by the relevant planning authority. The approved plan must be substantially in accordance with the Outline Battery Safety Management Plan. The Draft DCO also requires the relevant planning authority to consult with Dorset and Wiltshire Fire and Rescue Service and the Environment Agency before determining the application, and that the Battery Safety Management Plan must be implemented as approved. The Applicant confirms that a cumulative assessment of public health effects has been included at Section 18.13 of **ES Volume 1, Chapter 18: Human Health [APP-070]**. This finds no cumulative significant adverse effects to human health as a result of the identified developments, and no cumulative effect to human health that is of a greater significance than the assessment of the Scheme in isolation.

				Table 8-31 in the LVIA presented in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]** identifies the 'Included Cumulative Development Sites' assessed in the Cumulative Landscape and Visual Assessment. Where effects of the Lime Down Scheme were recorded, cumulative effects were assessed.

CAWS-033	Cumulative and In-Combination Effects	Requests to the Examining Authority	12.3 CAWS further submits that, given the material hydrological sensitivity of the area and the cumulative construction risks associated with the 22 km Cable Route Corridor, the Examining Authority cannot be satisfied that the Applicant has complied with the requirement to consider reasonable alternatives. The relevance of construction-phase flood risk associated with underground cabling in rural headwater environments is demonstrated by the National Grid Visual Impact Provision project at Bishops Cannings, as set out at Section 6.4.3 and Annex E. That evidence confirms that surface-water exceedance, focused runoff and off-site impacts are credible outcomes where cable works intersect sensitive drainage networks. This evidential gap is directly relevant to Question AQ9 and reinforces CAWS's position that, without a corridor-wide, construction-phase hydrological assessment and a documented appraisal of reasonable alternatives, the Examining Authority lacks a robust basis on which to conclude that cumulative impacts have been minimised or that the proposed route is acceptable in principle.	The Cable Route Corridor has been assessed for hydrology, flood risk and drainage effects during construction, including watercourse crossings and interaction with connected drainage systems, and the assessment concludes that the corridor can be constructed without increasing flood risk or giving rise to off site effects when the defined controls are implemented, as set out in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [APP-063]** and **ES Volume 3, Appendix 11-9 Flood Risk Assessment and Drainage Strategy - Lime Down Cable Route Corridor [APP-218]**. Construction phase mechanisms such as surface water exceedance, focused runoff, temporary alteration of flow paths and sediment related effects are addressed through corridor wide drainage principles and secured construction controls, rather than reliance on Flood Zone classification alone. Construction phase measures for the corridor will be delivered through the construction environmental management framework in **Outline Construction Environmental Management Plan [APP-277]**, with detailed method statements and drainage measures subject to approval by the relevant consultees through Development Consent Order requirements prior to commencement of works. This provides the enforceable mechanism to manage construction phase flood risk at sensitive locations along the corridor and to avoid off site impacts.

				The consideration of reasonable alternatives for route alignment is addressed through the scheme design and EIA process, and the hydrology and drainage assessment demonstrates that the proposed corridor is capable of being constructed and operated without adverse hydrological effects.

CAWS-034	Cumulative and In-Combination Effects	Conclusion	13. Conclusion 13.1 This Relevant Representation has focused on whether the Lime Down Solar Park application provides a sufficiently robust and complete evidence base to enable the Examining Authority to assess cumulative impacts affecting Shaw and Whitley in the round. 13.2 As set out in Section 1, CAWS's concern is not the principle of renewable energy development, but whether the evidence before the Examination is sufficient to assess cumulative and system-level impacts affecting Shaw and Whitley. 13.3 The evidence presented demonstrates that Shaw and Whitley occupy a down-slope, downstream, and down-network position relative to a highly concentrated cluster of energy infrastructure. In this context, impacts arising from construction activity, hydrology, cable routes, Battery Energy Storage Systems, emergency response, and system-level reliance on Melksham Substation do not operate independently, but interact and compound. 13.4 The Environmental Statement and supporting documents assess these matters largely on a site-by-site and asset-specific basis, with key elements deferred to outline plans or post-consent stages. CAWS submits that this approach does not provide the Examining Authority with sufficient certainty to understand how cumulative effects arise, how thresholds	The Applicant notes this comment. Detailed responses to all the points raised have been provided above in Sections 1 to 12 of the CAWs response.

			are approached or exceeded, or how risks are managed when multiple schemes operate concurrently. 13.5 In particular, the absence of: • a construction-phase, catchment-scale hydrology and flood-risk assessment; • a corridor-wide cumulative assessment of cable route construction impacts; • a cumulative BESS major accident and emergency response assessment; an • a system-level resilience assessment for Melksham Substation means that material questions remain unanswered at the consent stage. 13.6 CAWS submits that, without this further information, the Examining Authority cannot be satisfied that cumulative impacts affecting Shaw and Whitley have been adequately identified, assessed, and mitigated, or that the proposal complies with relevant development plan policies and national policy when impacts are considered cumulatively. 13.7 CAWS therefore respectfully invites the Examining Authority to require the additional assessments and information identified in Section 12, in order to support a properly informed, robust, and legally resilient decision on the Lime Down Solar Park application.	

CAWS-035	Cumulative and In-Combination Effects	Hydrology and Flood Risk (Construction Phase and Cumulative Effects)	ANNEX A – EXAMINING AUTHORITY QUESTIONS A. Hydrology and Flood Risk (Construction Phase and Cumulative Effects) AQ1 How has the Applicant assessed construction-phase hydrological impacts arising from cable trenching, haul roads, soil compaction, and temporary drainage interference on surface-water flood risk affecting Shaw and Whitley? AQ2 Why has a catchment-scale hydrology and flood-risk assessment not been undertaken, given the exceptionally dense headwater drainage network feeding directly through Shaw and Whitley? Please refer to Annex C in responding. AQ3 How does the Applicant demonstrate that simultaneous disturbance of multiple headwaters by different energy and enabling schemes will not result in cumulative downstream flood risk affecting Shaw and Whitley and their receiving watercourses?	**AQ1** The Cable Route Corridor has been assessed for hydrology, flood risk and drainage effects during construction, including potential impacts arising from cable trenching, temporary haul routes, soil disturbance and interaction with local drainage features. The assessment is set out in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [APP-063]** and the corridor specific assessment in **ES Volume 3, Appendix 11-9 Flood Risk Assessment and Drainage Strategy – Lime Down Cable Route Corridor [APP-218]**. These assessments consider construction phase mechanisms including surface water exceedance, focused runoff, temporary alteration of flow paths, soil disturbance and temporary drainage interference. The assessments conclude that, with the defined construction controls in place, the Cable Route Corridor can be constructed without increasing flood risk or giving rise to offsite hydrological effects affecting downstream receptors including Shaw and Whitley. Construction phase risks are controlled through the construction management framework secured in **Outline Construction Environmental Management Plan [APP-277]**, which includes measures to protect soils, manage temporary drainage, maintain existing land drainage pathways, control sediment and runoff, and prevent

				mobilisation of soils during trenching and reinstatement. **AQ2** A separate catchment scale flood risk assessment has not been required because the Scheme does not alter the wider hydrological functioning of the catchments draining to Shaw and Whitley. The Cable Route Corridor does not introduce permanent drainage diversions or extensive impermeable surfaces within the headwater systems. Works within the corridor are linear, temporary and localised in nature. The hydrology and flood risk assessment therefore focuses on the mechanisms by which construction activities could influence surface water pathways and runoff behaviour. These mechanisms are assessed in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [APP-063]** and **ES Volume 3, Appendix 11-9 Flood Risk Assessment and Drainage Strategy – Lime Down Cable Route Corridor [APP-218]**, which demonstrate that the defined construction controls ensure that headwater drainage systems are not materially disturbed and that catchment scale hydrological behaviour is not altered. Consideration of the routing of the Cable Route Corridor and reasonable alternatives is described in **Design Approach Document [APP-575]**, including the environmental and technical

				constraints that informed the selected alignment. AQ3 The Applicant does not agree that the Scheme would result in simultaneous disturbance of multiple headwaters that could materially alter downstream flood risk. Construction works within the Cable Route Corridor are undertaken sequentially along the route rather than across the full corridor simultaneously, and disturbance to soils and drainage features is temporary and subject to reinstatement. The potential for cumulative hydrological effects arising from disturbance of headwater drainage features has been considered through the hydrology and flood risk assessment presented in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [APP-063]**, together with the corridor specific assessment in **ES Volume 3, Appendix 11-9 Flood Risk Assessment and Drainage Strategy – Lime Down Cable Route Corridor [APP-218]**. Construction phase controls secured through **Outline Construction Environmental Management Plan [APP-277]** ensure that existing drainage pathways are maintained, soils are protected from compaction, temporary runoff is managed and disturbed ground is reinstated following installation of the cable. These measures prevent material disturbance of headwater systems and ensure that construction activities do not

				give rise to cumulative downstream flood risk affecting Shaw, Whitley or their receiving watercourses.

CAWS-036	Cumulative and In-Combination Effects	Cable Route Corridor (CRC): Construction Uncertainty and Cumulative Impact	B. Cable Route Corridor (CRC): Construction Uncertainty and Cumulative Impact AQ4 The Cable Route Construction Method Statement confirms that the final cable alignment, locations of trenchless sections, and selection of construction techniques will be determined at detailed design stage. Please explain how the Examining Authority can be satisfied at the consent stage that cumulative construction impacts along the 22 km Cable Route Corridor are acceptable in principle. AQ5 Please confirm whether any corridor-wide assessment has been undertaken to consider the cumulative effects of repeated trenching, haul road construction, HDD operations, and reinstatement along the full length of the Cable Route Corridor, and if not, why not. AQ6 Please provide information on: a) the anticipated duration that haul routes will remain in place along different sections of the Cable Route Corridor; and b) how repeated compaction, use, and reinstatement effects are assessed cumulatively rather than on a section-by-section basis.	AQ4 and AQ5: The full extent or 'worse case' effects arising from installation of the 400 kV cable have been assessed, identified and reported in the ES. The ES has been undertaken adopting the principles set out in the Planning Inspectorate's Advice Note Nine: Rochdale Envelope. The advice note acknowledges there may be aspects of the Scheme design that are not yet fixed and, therefore, it may be necessary for the EIA to assess likely worst-case variations to ensure all foreseeable significant environmental effects of the Scheme are considered. Aspects of the Scheme that require design flexibility include, but are not limited to, the arrangement of the: Solar PV Panels and panel type/specification; Conversion Units/33 kV Sub-distribution Switch Rooms; Associated Development such as the Battery Energy Storage System (BESS) Area, and Substations; and Grid Connection Cables and Interconnecting Cables, i.e. the routing of the cables within the Cable Route Corridor. Each technical chapter **[APP-059 – APP-072]** has assessed the design identified to be the likely worst-case scenario for that discipline in order to determine effect significance. Where necessary and appropriate, the technical chapter also sets out mitigation measures that would be implemented as part of the Scheme to address the effects identified.

			AQ7 Given the number of watercourse and drainage crossings along the Cable Route Corridor, how have cumulative effects within shared catchments been assessed, including the potential for simultaneous or sequential disturbance at multiple locations, and their implications for downstream receptors including Shaw and Whitley? AQ8 Please identify whether construction of the Cable Route Corridor overlaps temporally or spatially with other major energy or infrastructure projects in the area, and how any resulting cumulative construction impacts have been assessed. AQ9 Please explain what consideration has been given to reasonable alternative cable route alignments or connection strategies to Melksham Substation, including alternatives that would reduce construction-phase flood risk, drainage disturbance, or proximity to Shaw and Whitley, and how the selected route was determined to represent the least harmful reasonable option.	AQ6: a) for the purposes of assessing a worst case scenario, the cable corridor haul route is assumed to be in place for an 18-month duration as shown in Table 3-4 **[APP-055].** b) refer to the response to Q4 and Q5 above - each of the technical assessments considers the maximum envelope and worst case scenario. AQ7: Cumulative effects within shared catchments have been assessed through the hydrology and flood risk assessment in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [APP-063]** and the supporting **Flood Risk Assessment and Drainage Strategy – Lime Down Cable Route Corridor [APP-218]**. The assessment considers the full extent of the 22 km Cable Route Corridor and identifies all watercourse crossings, drainage interactions and construction-phase mechanisms, including temporary runoff generation, disturbance to field drainage and interaction with headwater systems. The assessment does not treat each crossing in isolation. It considers the potential for downstream propagation of effects through shared drainage networks and assesses impacts at the level of downstream receptors. Construction-phase disturbance is assessed on a reasonable worst-case basis, including the potential for sequential works along the corridor. Embedded mitigation and

				corridor-wide drainage principles are applied consistently along the route. Construction controls to manage temporary drainage, protect existing land drainage and prevent mobilisation of sediment are secured through the **Outline Construction Environmental Management Plan [APP-277]**, with detailed construction arrangements approved under the **Draft Development Consent Order [APP-016]**. With these controls in place, the assessment concludes that there would be no significant cumulative adverse effects on downstream receptors, including Shaw and Whitley, and no increase in flood risk elsewhere. AQ8: A number of proposed developments overlap with the southern portion of the Cable Route adjacent to Melksham sub-station. The developments are identified in Environmental Statement **Chapter 21 Cumulative and In Combination Effects** [**APP-264**]. Each development is considered within the technical ES Chapters' cumulative assessment [**APP-059 - APP-072**] and a summary provided in Environmental Statement **Chapter 21 Cumulative and In Combination Effects** [**APP-264**]. With implementation of construction phase mitigation and the secured **Outline Construction Environmental Management Plan (OCEMP)** [**APP-278],** no significant cumulative effects are identified. AQ9:

				Details on the alternative cable route alignments considered are set out in **ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP-056].** The alignment of the Cable Route Corridor was chosen in consideration of, and to balance the effects on, a number of environmental factors including hydrology, flood risk and drainage, and proximity to residential receptors.

CAWS-037	Cumulative and In-Combination Effects	Battery Energy Storage Systems (BESS): Cumulative Fire and Major Accident Risk	AQ10 How has the Applicant assessed cumulative BESS fire and major accident risk arising from clustered installations connected to the same grid node in the Melksham–Shaw–Whitley area? AQ11 What assessment has been undertaken of cascading, concurrent, or sequential BESS incidents within the cluster, and how is this reflected in the safety case, including consideration of impacts on connected and downstream communities such as Shaw and Whitley?	The air quality assessment (**ES Volume 1, Chapter 15: Air Quality [APP-067]**) considers emissions from a single BESS fire within the Lime Down BESS area only. BESS fire emissions associated with other schemes identified in **Appendix 21-1: Long List of In-Combination Effects and Cumulative Developments [APP-264]** are located several kilometres from the Lime Down BESS area and therefore fall well outside the BESS fire emissions study area. On this basis, significant cumulative air quality effects from clustered BESS fire incidents were not identified. The air quality assessment does not model cascading, concurrent or sequential BESS fires across multiple sites. The assessment is based on a single container fire at Lime Down BESS, consistent with the assumptions set out in the **Outline Battery Safety Management Plan [APP-286]**, which identifies multiple layers of prevention and design measures intended to limit credible fire spread. Worst case receptors where public exposure could reasonably occur have been modelled, including residential properties, public rights of way and transport corridors. The modelling demonstrates that concentrations reduce rapidly with distance, and beyond 1 km, the effects would be negligible due to atmospheric dispersion and dilution. The scope of the Plume Assessment Study fully aligns with NFCC guidance and UKHSA BESS emissions modelling requirements. The UKHSA is a statutory consultee for the Scheme and has stated

				they are satisfied with the scope and methodology of the BESS fire emissions modelling. The spacing distances of illustrative BESS site design are based upon Large Scale Fire Testing (LSFT) where no fire propagation occurred, therefore this is a credible worst-case scenario. The **OBSMP [APP-286]** stipulates that the Applicant at detailed design will only select a BESS system that as mandated under NFPA 855 (2026) must have undertaken Large Scale Fire Testing (LSFT) as part of UL 9540A tests and / or 3rd party full scale destruction testing. This testing involves burning the full BESS system to validate safe equipment spacing and performance test active and passive mitigation systems integrated into the BESS design. The objective of the test is to evaluate the thermal exposure impacts from a developed BESS enclosure, to determine propagation risk to adjacent BESS or equipment. Testing also defines the length of burn, duration of Peak Heat Release Rate, maximum burn temperatures, etc. The detailed design phase of the Scheme will consider the lifecycle of the battery system from installation (during the construction phase of the Scheme) to decommissioning. At the detailed design stage, the selected BESS will have undertaken Large Scale Fire Testing (LSFT) to fully inform inputs for risk assessment tools which will be utilised together with detailed consequence modelling to provide a comprehensive site operations and

				emergency response safety audit. LSFT of the selected BESS design is conducted to establish minimum equipment spacing distances (no fire propagation to adjacent BESS or infrastructure) and site-specific consequence modelling will provide a clear, evidence-based case for the final BESS area installation plans at the detailed design phase and will be agreed with D&WFRS. Section 5.5.9 of the OBSMP stipulates: *"at the detailed design stage a BESS system and site-specific Plume Analysis study will be conducted to assess the environmental impact of a site incident to sensitive receptors within a 1 km radius. Toxic gas emissions to sensitive receptors must be below relevant public health exposure limit guidelines when the battery system of a BESS is fully consumed (burnt out), production of Particulate Matter (PM) and a visibility impact assessment on any transport links within a 1 km radius of the BESS area will also be included. The ERP produced at the detailed design stage will incorporate all necessary emergency response procedures and actions based upon thermal runaway test data supplied by the BESS system provider."* Section 6.1.3 – 6.1.7 of the OBSMP defines key risk assessments and consequence modelling reports required by NFPA 855, NFCC guidance, and HSE BESS safety requirements. These risk assessment tools minimize BESS failure risks, mitigate BESS failure scenarios, and minimize fire propagation risks.

				Final comprehensive risk assessment reports, BESS design and site-specific consequence modelling, and detailed Emergency Response Plans (ERPs) can only be drafted when based upon the specific BESS design selected at the detailed design stage. Key safety content requires that all equipment within the BESS area is defined, battery system operating limits and test data are fully defined, and the BESS failure protection system is defined. Incident response tactics require significant test data and rigorous consequence modelling from the specific BESS design to develop safe protocols for incident response. The **OBSMP [APP-286]** is secured through Requirement 6 (Battery safety management) in Schedule 2 of the **Draft DCO [APP-016]**, which provides that Work No. 2 must not commence until a Battery Safety Management Plan has been submitted to and approved by the relevant planning authority. The approved plan must be substantially in accordance with the Outline Battery Safety Management Plan. The Draft DCO also requires the relevant planning authority to consult with Dorset and Wiltshire Fire and Rescue Service and the Environment Agency before determining the application, and that the Battery Safety Management Plan must be implemented as approved.

CAWS-038	Other Environmental Matters	Status and Application of NFCC Guidance	AQ12 The Applicant refers to revised or updated National Fire Chiefs Council (NFCC) guidance within its Battery Safety Management Plan. Please confirm: a) which version of NFCC Grid Scale BESS Planning Guidance has been formally issued and was relied upon in preparing the application; and b) where draft or anticipated revisions have been relied upon, what weight the Examining Authority should attach to those drafts when assessing safety and emergency response compliance.	An **Outline Battery Safety Management Plan (OBSMP) [APP-286]** has been prepared for the Scheme using guidance from Dorset and Wiltshire Fire and Rescue Service (D&WFRS) and incorporating recommendations of the National Fire Chiefs Council. The OBSMP is fully compliant with the original NFCC Guidance and the revised guidance which was published in February 2026. The revised guidance integrates revisions and refinements to the 2024 draft which were already included in the OBSMP, except that the Applicant will still integrate a 10m vegetation clearance distance around BESS enclosures, rather than reducing to 3 metres. The illustrative BESS enclosure and site layout integrated equipment spacing from a BESS supplier which had conducted LSFT with spacing of 150mm between adjacent BESS enclosures with BESS unit heat flux measurement panels located 2.5 metres from the BESS and an egress heat flux gauge at 1.25m from the BESS (positioned at the front and back side of the initiating BESS enclosure). Fire did not propagate between BESS enclosures and heat flux data at heat flux locations was within limits to demonstrate that fire safety and propagation risks are mitigated. Original NFCC guidance and revised NFCC guidance permit site layout distances to be validated through evidence-based reduction i.e. LSFT (full scale fire test data). Therefore, the Applicant's illustrative BESS site layout

				3.5m with 0.9m back-to-back spacing is compliant with fully validated by LSFT. The OBSMP already incorporates rigorous explosion prevention and mitigation stipulates based upon NFPA 855 requirements which are now integrated into the 2026 NFCC guidance. Site design ensures that D&WFRS would not have to travel or operate in a smoke plume / vapour cloud. The OBSMP specifies that the indicative site design will accommodate as follows: *"The BESS Area will contain a minimum of two firefighting water storage units of no less than 228,000 litres in capacity, capable of delivering 1900 litres per minute for 4 hours (exceeding NFCC guidance)."* As now mandated under NFPA 855 (2026) the Applicant will only be able to select a BESS system that has undertaken Large Scale Fire Testing (LSFT). At the detailed design stage, the selected BESS LSFT data will be leveraged to fully inform inputs for risk assessment tools which will be utilised together with detailed consequence modelling to provide a comprehensive site operations and emergency response safety audit, this is stipulated in the OBSMP pre-construction requirements (Section 6). Section 5.3.2 stipulates that: *"The firefighting water requirement will be fully assessed at the detailed design stage based upon BESS fire and explosion test data by an independent Fire Protection Engineer and water storage volumes will*

				be agreed with D&WFRS during detailed design." The Applicant is in the process of agreeing a Statement of Common Ground (SOCG) with D&WFRS to provide assurance that all safety and emergency response requirements are fulfilled.

CAWS-039	Other Environmental Matters	BESS Layout, Spacing, and Escalation Scenarios	AQ13 NFCC Guidance (Version 1.0, November 2022) suggests a minimum separation distance of 6 metres between BESS units unless a competent, evidence-based fire engineering case demonstrates that reduced spacing will not increase propagation risk. Please provide the fire engineering justification relied upon for the proposed separation distances at Lime Down, including how that justification accounts for clustered BESS development. AQ14 The Fire Emissions Modelling is based on a single-container fire scenario. Please explain: a) why multi-container escalation scenarios have been excluded; and b) whether prolonged or defensive firefighting scenarios have been considered, and if not, why they are not considered credible in the context of clustered BESS development.	The air quality assessment does not model cascading, concurrent or sequential BESS fires across multiple sites. The assessment is based on a single container fire at Lime Down BESS, consistent with the assumptions set out in the **Outline Battery Safety Management Plan (OBSMP) [APP-286]**, which identifies multiple layers of prevention and design measures intended to limit credible fire spread. The OBSMP stipulates that minimum site equipment spacing distances are established through Large Scale Fire Testing (LSFT) as mandated through NFPA 855 (2026) and NFCC (2026) guidance requirements. Worst case receptors where public exposure could reasonably occur have been modelled, including residential properties, public rights of way and transport corridors. The modelling demonstrates that concentrations reduce rapidly with distance, and beyond 1 km, the effects would be negligible due to atmospheric dispersion and dilution. The Applicant has followed National Fire Chiefs Council (NFCC) guidance and commissioned a Plume Assessment Study to model toxic gas emissions and visibility impacts from a BESS fire on all sensitive receptors within a 1km radius of the BESS area. The fire emissions modelled in the report were based upon recent UK Health Security Agency (UKHSA) requests for DCO BESS projects which explore both immediate air quality impacts together with annual UK air quality requirements. The UKHSA is a statutory consultee for the Scheme and

				has confirmed that they are satisfied with the Applicant's submitted documentation and Plume Assessment Study methodology and results. The spacing distances of the illustrative BESS site design are based upon Large Scale Fire Testing (LSFT) where no fire propagation occurred, therefore, this is a credible worst-case scenario. The **OBSMP [APP-286]** stipulates that the Applicant at detailed design will only select a BESS system that as mandated under NFPA 855 (2026) must have undertaken Large Scale Fire Testing (LSFT) as part of UL 9540A tests and / or 3rd party full scale destruction testing. This testing involves burning the full BESS system to validate safe equipment spacing and performance test active and passive mitigation systems integrated into the BESS design. The objective of the test is to evaluate the thermal exposure impacts from a developed BESS enclosure, to determine propagation risk to adjacent BESS or equipment. Testing also defines the length of burn, duration of Peak Heat Release Rate, maximum burn temperatures, etc. The detailed design phase of the Scheme will consider the lifecycle of the battery system from installation (during the construction phase of the Scheme) to decommissioning. At the detailed design stage, the selected BESS will have undertaken Large Scale Fire Testing (LSFT) to fully inform inputs for risk assessment tools which will be utilised together with detailed

				consequence modelling to provide a comprehensive site operations and emergency response safety audit. LSFT of the selected BESS design is conducted to establish minimum equipment spacing distances (no fire propagation to adjacent BESS or infrastructure) and site-specific consequence modelling will provide a clear, evidence-based case for the final BESS area installation plans at the detailed design phase and will be agreed with D&WFRS. Section 5.5.9 of the OBSMP stipulates: *"at the detailed design stage a BESS system and site-specific Plume Analysis study will be conducted to assess the environmental impact of a site incident to sensitive receptors within a 1 km radius. Toxic gas emissions to sensitive receptors must be below relevant public health exposure limit guidelines when the battery system of a BESS is fully consumed (burnt out), production of Particulate Matter (PM) and a visibility impact assessment on any transport links within a 1 km radius of the BESS area will also be included. The ERP produced at the detailed design stage will incorporate all necessary emergency response procedures and actions based upon thermal runaway test data supplied by the BESS system provider."* Section 6.1.3 – 6.1.7 of the OBSMP defines key risk assessments and consequence modelling reports required by NFPA 855, NFCC guidance, and HSE BESS safety requirements. These risk assessment tools minimize BESS failure

				risks, mitigate BESS failure scenarios, and minimize fire propagation risks. Section 5 of the OBSMP covers all requisite firefighting requirements for the Scheme including fire service access, firefighting water supply, and emergency planning requirements and is fully compliant with NFCC guidance.
CAWS-040	Other Environmental Matters	Firewater, Contamination, and Hydrological Connectivity	AQ15 Please explain how the proposed firewater containment and drainage measures would perform under exceedance or failure conditions during a prolonged BESS fire, including scenarios involving heavy rainfall or delayed emergency response, and how contaminated water would be prevented from entering connected headwater drainage systems or downstream receptors, including those affecting Shaw and Whitley and the River Avon catchment.	The Applicant is currently drafting a Statement of Common Ground (SOCG) with the Environment Agency (EA) on Scheme environmental protection issues including the BESS area drainage strategy. The agreed strategy document will be appended to the OBSMP at Deadline 1, to provide further assurance that all water pollution risks from a BESS fire are fully mitigated. The EA is a statutory consultee for the OBSMP and drainage strategies and must approve the final BSMP and drainage design at detailed design before construction of the BESS commences. The **OBSMP [APP-286]** is secured through Requirement 6 (Battery safety management) in Schedule 2 of the **Draft DCO [APP-016]**, which provides that Work No. 2 must not commence until a Battery Safety Management Plan has been submitted to and approved by the relevant planning authority. The approved plan must be substantially in accordance with the Outline Battery Safety

				Management Plan. The Draft DCO also requires the relevant planning authority to consult with Dorset and Wiltshire Fire and Rescue Service and the Environment Agency before determining the application, and that the Battery Safety Management Plan must be implemented as approved. The BESS drainage and firewater management approach is designed to prevent contaminated water from entering ground or surface water receptors, including during exceedance conditions, and the assessment concludes that off site pathways to connected watercourses and downstream communities would be prevented through engineered containment and isolation measures. This is set out in **ES Volume 3, Appendix 11-6 Flood Risk Assessment and Drainage Strategy – Lime Down D BESS [APP-215]**, supported by the assessment of off site receptors in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [APP-063]**. The approach to firewater containment, exceedance scenarios and emergency response has been informed by relevant National Fire Chiefs Council guidance on grid scale Battery Energy Storage Systems and is reflected in the submitted safety and management framework. The operational controls, incident response principles and management of retained and potentially contaminated water are set out in **Outline Battery Safety Management Plan [APP-286]**, which sits alongside the drainage strategy to ensure

				that contaminated firewater can be isolated, retained and managed without discharge to connected drainage systems or downstream receptors, including those draining towards Shaw and Whitley and the River Avon catchment. Detailed operational procedures and final arrangements will be secured through Development Consent Order requirements and will be subject to approval by the relevant consultees prior to operation, ensuring that the assessed measures are implemented and maintained in practice.

CAWS-041	Other Environmental Matters	Emergency Response Capacity	AQ16 What evidence demonstrates that emergency services have sufficient capacity to respond to prolonged or concurrent BESS incidents within the Melksham–Shaw–Whitley infrastructure cluster? AQ17 How has emergency response planning accounted for non-linear escalation of risk arising from clustered energy infrastructure, including the potential for resource saturation?	In relation to the Lime Down project, a comprehensive Cumulative and In-Combination Effects Assessment has been undertaken in accordance with Planning Inspectorate Advice Note 17 and the relevant requirements of NPS EN-1, NPS EN-3 and NPS EN-5, as set out within **ES Volume 1, Chapter 21 [APP-074]** and its associated Appendices [**APP-264].** Interaction with proposed or consented, but not yet constructed, developments has been fully assessed across the technical topics **[APP-059 – APP-072]**, with a summary of these assessments presented within **ES Volume 1, Chapter 21 In-Combination and Cumulative Effects [APP-073]**. Existing schemes are captured within the baseline environment, and the four-stage cumulative assessment methodology is described in **ES Volume 1, Chapter 6 EIA Methodology [APP-058]**. The list of developments included within the cumulative assessment was reviewed and refined in consultation with Wiltshire Council. In addition to environmental topic assessments, a cumulative major accident assessment (including Building Failure, Fire and Associated Explosions) has also been undertaken in **ES Volume 1, Chapter 20: Other Environmental Matters [APP-072].** This assessment concludes that with the mitigation measures listed in Table 20-19 to reduce the risk of fire and other shortlisted events, no cumulative effects are identified.

				The air quality assessment (**ES Volume 1, Chapter 15: Air Quality [APP-067]**) considers emissions from a single BESS fire within the Lime Down BESS area only. BESS fire emissions associated with other schemes identified in **Appendix 21-1: Long List of In-Combination Effects and Cumulative Developments [APP-264]** are located several kilometres from the Lime Down BESS area and therefore fall well outside the BESS fire emissions study area. On this basis, significant cumulative air quality effects from clustered BESS fire incidents were not identified. The air quality assessment does not model cascading, concurrent or sequential BESS fires across multiple sites. The assessment is based on a single container fire at Lime Down BESS, consistent with the assumptions set out in the **Outline Battery Safety Management Plan [APP-286]**, which identifies multiple layers of prevention and design measures intended to limit credible fire spread. Worst case receptors where public exposure could reasonably occur have been modelled, including residential properties, public rights of way and transport corridors. The modelling demonstrates that concentrations reduce rapidly with distance, and beyond 1 km, the effects would be negligible due to atmospheric dispersion and dilution. The scope of the Plume Assessment Study fully aligns with NFCC guidance and UKHSA BESS emissions modelling requirements. The UKHSA is a statutory

				consultee for the Scheme and has stated they are satisfied with the scope and methodology of the BESS fire emissions modelling. The spacing distances of illustrative BESS site design are based upon Large Scale Fire Testing (LSFT) where no fire propagation occurred, therefore this is a credible worst-case scenario. Moreover, An **Outline Battery Safety Management Plan (OBSMP) [APP-286]** has been submitted with the Application. The OBSMP confirms that a robust and validated Emergency Response Plan (ERP) will be developed at the detailed design stage in consultation with Dorset & Wiltshire Fire and Rescue Service. Section 5.4 of the OBSMP sets out the typical emergency response protocols, procedures and safety information that will be included in the ERP. The ERP will apply across all phases of the Scheme, including construction, operation, and decommissioning. These measures would further ensure that in the unlikely event a BESS fire broke out, nearby Schemes would remain unaffected. The Applicant's OBSMP is fully compliant with NFCC Guidance for the Scheme. The OBSMP covers all credible fire, explosion, toxic emission, and pollution risks. As now mandated under NFPA 855 (2026) the Applicant will only be able to select a BESS system that has undertaken Large Scale Fire Testing (LSFT). At the detailed design stage, the selected BESS LSFT data will be leveraged to fully inform inputs for risk assessment tools which will be utilised

				together with detailed consequence modelling to provide a comprehensive site operations and emergency response safety audit, this is stipulated in the OBSMP pre-construction requirements (Section 6). Section 2.4.2 of the OBSMP stipulates that: *"Final BESS design and site layout will have been validated through mandatory Large Scale Fire Testing (LSFT) and rigorous consequence modelling to minimise the requirement for any D&WFRS intervention in a thermal runaway incident. LSFT must establish minimum equipment spacing distances that demonstrate there is no fire propagation to adjacent BESS enclosures or ESS equipment. D&WFRS intervention in worst case scenarios would typically be limited to boundary cooling of adjacent BESS and Energy Storage System (ESS) units to prevent the fire from spreading. This strategy will be finalised with D&WFRS and be clearly communicated in the Emergency Response Plan (ERP); • To ensure that fire, smoke, and any release of toxic gases does not significantly impact site operatives, first responders, and the local community; and • To ensure that firewater run-off is contained and tested before release or, if necessary, removed by tanker and treated offsite."* The Applicant is in the process of agreeing a Statement of Common Ground (SOCG) with D&WFRS to provide assurance that all safety and emergency response requirements are fulfilled.

				D&WFRS will have separate Risk Management and Site Specific Risk Information (SSRI) plans for every BESS facility in the area, the Applicant's OBSMP section 5.4 covers information that must be provided for this documentation in addition to ERPs information requirements. The **OBSMP [APP-286]** is secured through Requirement 6 (Battery safety management) in Schedule 2 of the **Draft DCO [APP-016],** which provides that Work No. 2 must not commence until a Battery Safety Management Plan has been submitted to and approved by the relevant planning authority. The approved plan must be substantially in accordance with the Outline Battery Safety Management Plan. The Draft DCO also requires the relevant planning authority to consult with Dorset and Wiltshire Fire and Rescue Service and the Environment Agency before determining the application, and that the Battery Safety Management Plan must be implemented as approved.

CAWS-042	Cumulative and In-Combination Effects	Landscape, Heritage, and Settlement Identity	H. Landscape, Heritage, and Settlement Identity (Cumulative Effects) AQ18 How has cumulative visual coalescence arising from multiple energy and grid developments affecting Shaw and Whitley been assessed? AQ19 How does the proposal comply with policies protecting settlement separation and rural identity when impacts are assessed cumulatively rather than scheme-by-scheme?	Table 8-31 in the **LVIA [APP060]** identifies the 'Included Cumulative Development Sites' assessed in the Cumulative Landscape and Visual Assessment. The list includes those schemes from the Cumulative Short list (**ES Volume 1, Chapter 21 Cumulative and In Combination Effects [APP-073])** that have the potential to give rise to cumulative landscape & visual effects. Policy 18 Landscape Character of the Joint Melksham Neighbourhood Plan, which makes reference to rural identify, is considered in Annex B: Local Policy Accordance Tables of the **Planning Statement [APP-267]** which explains the relevant assessments and the proposed landscaping and ecological measures that form part of the Scheme. It is also explained that with regard to the Cable Route Corridor, no significant landscape effects would occur within the Cable Route Corridor Study Area with all effects being short term and temporary as a result of the cables being underground. Policy 19 Separation of Settlements of the Joint Melksham Neighbourhood Plan is considered in Annex B: Local Policy Accordance Tables of the **Planning Statement [APP-267]** where it confirms that the Scheme is not located between the settlements stated in the policy, namely: • Whitley and Shaw; • Shaw and Melksham; • Beanacre and Melksham; and • Berryfield and Semington.

CAWS-043	Cumulative and In-Combination Effects	Grid and Substation Resilience	I. Grid and Substation Resilience AQ20 What assessment has been undertaken of system-level resilience and cascading failure risk associated with increased reliance on Melksham Substation? AQ21 How has the Applicant considered the implications of single-node dependency for safety, reliability, and community risk?	AQ20: The Applicant has accepted an offer from NESO to connect to connect the Scheme to the existing Melksham National Grid Substation. Prior to issuing a connection offer, the Applicant understands that NESO followed their due processes including conducting all necessary studies to confirm that the connection as proposed is technically feasible and compatible with well-established technical requirements including those related to system security, system stability and fault conditions. AQ21: The Applicant has accepted an offer for a firm connection to an existing part of the NETS which has historically operated with a high degree of reliability and availability. The connection will be designed, built and operated to well established industry standards to mitigate relevant foreseeable risks, in accordance with industry standards.
CAWS-044	Cumulative and In-Combination Effects	Procedural Sufficiency	AQ22 In the absence of the cumulative and system-level assessments identified above, on what basis does the Applicant consider that the Examining Authority can reach a robust, reasoned, and lawful conclusion on cumulative impacts affecting Shaw and Whitley?	There is no absence of cumulative assessment within the Application. Refer to responses to AQ4, 5 and 6 above. The project alone scenario considers all elements on the Lime Down Scheme for each Environmental Statement technical discipline **[APP-059 - APP-072]**; the in-combination effects assessment considers the combined effect of individual impacts from the Scheme, for example, where a single receptor is affected by both noise and traffic during the construction phase **[APP-073]**; and the cumulative assessment reports the combined effects of other proposed schemes which may interact cumulative with the Scheme **[APP-073].**

CAWS-045	Cumulative and In-Combination Effects	Procedural Sufficiency	AQ23 – Deferral of Fundamental Matters and Risk Allocation The application defers key matters integral to the acceptability of the proposal — including detailed Cable Route Corridor alignment, construction methods, drainage interactions under exceedance conditions, and aspects of construction-phase mitigation — to outline plans, post-consent approval mechanisms or future engagement. Please explain: a) how the Examining Authority can be satisfied at the consent stage that construction-phase hydrological, contamination and safety risks affecting downstream receptors, including Shaw and Whitley, are acceptable in principle; b) why deferral of these matters does not result in the transfer of unresolved risk from the Applicant to affected communities and public services; and c) on what basis such deferral is considered compatible with the precautionary approach required by the EIA Regulations, NPPF paragraphs 159–169, and National Policy Statement EN-1 paragraph 5.7.	The Examining Authority can be satisfied at the consent stage because the application assesses construction phase hydrology, flood risk and contamination effects on downstream receptors, including Shaw and Whitley, and demonstrates that these risks can be controlled within the consented envelope. This assessment is set out in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [APP-063]**, supported by the Flood Risk Assessment and Drainage Strategy suite, including the Cable Route Corridor and BESS specific appendices, which address construction phase mechanisms, exceedance scenarios and off site pathways and conclude that no increase in flood risk or adverse effects would arise when the defined controls are implemented. Deferral of detailed alignment and method statements does not transfer unresolved risk to communities or public services because the parameters and mitigation measures that control hydrological, contamination and safety risks are defined at application stage and secured through enforceable Development Consent Order requirements. Detailed construction drainage, pollution prevention and exceedance controls will be subject to approval by the relevant consultees through the **Outline CEMP [APP-277]** and associated requirements, ensuring that the Applicant remains responsible for delivering the assessed mitigation prior to and during construction.

				This approach is compatible with the precautionary principle as applied through the EIA Regulations, the NPPF and National Policy Statement EN-1, as the likely significant effects have been identified and assessed on a maximum realistic 'worst case' basis, the conclusions are not dependent on undefined future design, and the consent framework ensures that residual detail is controlled within clear limits and subject to regulatory approval rather than left unexamined.

4.9 North Wiltshire Friends of the Earth

Table 4-9 RR-3558

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response

NWFOE-001	Description and DCO Process	Economic and Community Impact	The area is historically an agricultural, rural area and this is reflected in its economy and pattern of residence. This development, which is over a very extensive area, will profoundly alter its rural nature and impact on its pattern of settlement. Therefore, whilst it is up to the community to represent to the Inspectorate the precise nature of their community and its historical, traditional relationship with this area, it is important that the Inspectorate clearly interrogates the developer as to the nature of the impact and change that they will bring to the area in terms of alteration from its historical and current character. The impact should be assessed both economically and in terms of impact on the communities living there, and it is important the Inspectorate arrives at its own judgment of this impact. In other words, on balance and using the foregoing criteria, is the nature of the impact sufficiently beneficial or detrimental in terms of being a significant determinant of the final planning decision? The Inspectorate needs to form an opinion in this regard, and to make recommendations, because the size of the development is so large that it will undeniably have an impact.	The Applicant has committed to understanding the affect the Scheme will have on local communities and has sought to provide a robust assessment of the likely significant effects generated by the Scheme. Employment and economic effects have been assessed in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** which finds no significant beneficial or adverse effects to employment or economic performance in the industry sectors that have been included (construction, engineering, agriculture, accommodation services, and tourism and recreation-dependent industries). Furthermore, the likely effects from the Scheme on communities with respect to social changes and community wellbeing have been assessed in **ES Volume 1, Chapter 18: Human Health [APP-070]**. This assessment has considered access to the countryside, physical health from environmental changes, and community wellbeing and mental health through assessment of changes to community identity and culture. The assessment finds no significant adverse effects to health and wellbeing at any phase of the Scheme.

NWFOE-002	Description and DCO Process	Land Ownership	The Inspectorate needs to establish, and the Inquiry make public, the ownership of the land on which the development will take place, and the Inspectorate should publish the nature and terms of the financial benefit to the landowners of the development sites if they are receiving a financial benefit from this development should the Inspectorate approve it.	The Applicant notes the comments made. All parties that have an interest in land can be found within the **Book of Reference [APP-020]** and those where rights are being sought by the Applicant and an update on negotiations can be found in the **Land and Rights Negotiation Tracker [APP-021]**. At the initial stage of developing proposals for the Scheme, the Applicant has entered into option agreements with landowners. These agreements put in place legally binding obligations to lease land that is being proposed for solar panels, substations, energy storage and other associated developments relating to the Scheme. These agreements are industry standard and provide landowners with certainty and protection over the use of their land while securing development rights for the Scheme. The option agreements give the Applicant exclusive rights during both the option period and the lease term.

NWFOE-003	Construction and Decommissioning	Decommissioning	The development, if it occurs, will convert the land from agricultural to developed status in planning terms. Therefore, the Inspectorate needs to establish from the developer whether it intends to restore the development sites so that they may once again be used for agriculture at the end of the term of the planning consent. If the developer says that will be the case and will allow this requirement to be a specific condition of the planning consent, then the Inspectorate should establish whether there should be a need for the developer to be bound under the terms of planning consent to establish a fund, contributed to by the developer during the lifetime of the development, that will enable the owner of the development at the time of the expiry of the planning consent, to have available the full funds that are necessary to restore the sites to agricultural use. This should be a fund established on an ESCROW financial basis. If the developer has no such plans for a fund of this nature, the Inspectorate should form an opinion whether such a fund is necessary and, if it is, to establish the terms on which its should operate, and include these matters as a condition of planning consent.	The Applicant confirms that, if consent is granted, it has the capability to build, own, and operate the Scheme. The Applicant may also consider the option to sell or transfer the Scheme to another suitably qualified party. Regardless of any future ownership, the undertaker as defined in the draft Development Consent Order **[APP-016]** will remain bound by the legally enforceable requirements of the DCO. The decommissioning of the Scheme has been assessed within the **ES [APP-052 to APP-265]** which considers the likely significant effects associated with decommissioning activities. Where likely significant effects are identified, appropriate mitigation measures are incorporated into the Scheme. At the end of the Scheme's operational life, all Solar PV Sites would be decommissioned and the land restored to its original use and condition as far as practicable. The Applicant expects that most of the solar equipment – including panels, cabling, inverters, BESS and substations – to be recycled and disposed of, in line with industry practice. The Applicant expects there to be even greater opportunities for recycling at the end of the Scheme's design life. There will be opportunities for the retention of a range of biodiversity improvements, including established habitats, hedgerows and woodland, beyond the decommissioning of the Scheme,

				ultimately enhancing the ecological value of the area. Decommissioning is secured through Requirement 20 in Schedule 2 of the **Draft Development Consent Order [APP-016]**. The Applicant has produced an **Outline Decommissioning Strategy [APP-279]** as part of the EIA submitted with the DCO Application. A final decommissioning strategy will be prepared and agreed with the relevant authorities at that time of decommissioning and will include detailed measures and timescales. Failing to comply with Requirement 20 would be a criminal offence. Decommissioning is also covered in agreements with landowners, which includes decommissioning securities to cover the cost of decommissioning in the event of any breach by the Applicant or in the event of the insolvency of the Applicant. The amount of such decommissioning security is regularly re-valued throughout the lifecycle of the Scheme and topped up if necessary to ensure the Scheme can be decommissioned and the land restored back to its existing use.

NWFOE-004	Ecology and Biodiversity	Biodiversity Net Gain	The Inspectorate should establish from the developer, and from the authorities that regulate these matters. e.g. Natural England and Defra, the precise meaning and terms of Biodiversity Net Gain. Once the Inspectorate has obtained this clear definition of Biodiversity Net Gain, the Inspectorate needs to establish precisely from the developer and the regulatory authorities how the measurement of Biodiversity Net Gain will apply in this development, how it will be measured during the lifetime of the development, and the nature of the actions that the regulator must enforce upon the developer during the lifetime of the development to ensure that Biodiversity Net Gain occurs. And the Inspectorate needs to establish, if the regulator believes that the developer is ignoring this duty during the lifetime of the development, the nature of the enforcement that the regulator will impose on the developer. Thus, the Inspectorate needs to interrogate both the developer and the regulatory authorities as to the meaning of Biodiversity Net Gain in terms of this development, and to make such conditions in the planning consent that will ensure that Biodiversity Net Gain will occur.	The Applicant notes this comment. In the context of development and relevant primary legislation (Environment Act 2021), Biodiversity Net Gain (BNG) is measured in standardised biodiversity units which are generated based on the size, quality, location and distinctiveness of linear and area-based habitats.

NWFOE-005	Ecology and Biodiversity	Biodiversity Net Gain	One of the essential criteria for Biodiversity Net Gain, and the overall gain for the area and its community, is that the carbon content of the soil on the development sites should rise during the lifetime of the development, and that this should be at a rate of 1% annually. This is a necessary requirement for two reasons. Firstly, carbon in soil is a significant factor in the sound physical, chemical and biological condition of the soil and, therefore, continual improvement in this feature of the structure of the soils should be a requirement of Biodiversity Net Gain and, similarly, an obligation upon the developer. Secondly, the sequestration of carbon into soil is a significant climate restoration tool in order to reduce the carbon level in the atmosphere and, therefore, this renewable energy project should not just be harnessing solar energy but also storing carbon in the soil in order to help the broader endeavour of the nation to reduce the retention of solar energy in the planet's atmosphere due to the excessive levels of carbon (C02). Thus, the Inspectorate needs to interrogate the developer and the regulatory authorities on the necessity for an annual increase of 1% in the carbon content of the soil, both for reasons of biodiversity net gain and the wider campaign to reduce global atmospheric carbon levels. And, if the Inspectorate concludes that such carbon sequestration in the development site's soils is a vital feature of the development, the Inspectorate should include this requirement as a condition of planning	The Applicant notes this comment. Carbon content is not a criteria measured within the DEFRA-published Statutory Biodiversity Net Gain (BNG) Metric for calculating BNG. Instead the Metric takes into account the distinctiveness and condition of habitats, which are a reflection of various biotic and abiotic factors, with soil health undoubtedly having a large influence on the habitats which materialise. The ecological development of habitats over the lifespan of the Scheme will be monitored in line with the monitoring strategy set out in the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]**, which includes monitoring of soil conditions. The overall health, quality and structure of soil within the Solar PV Sites is expected to improve over the lifespan of the array, as set out in **ES Volume 1, Chapter 17: Soils and Agriculture [APP-069]**.

			consent, along with the manner in which this requirement will be enforced.	
NWFOE-006	Arboriculture	Trees and Hedgerows	The Inspectorate should interrogate the developer as to the precise nature of the plans to plant hedges and trees in the development area, the location and nature of that planting, and the Inspectorate needs to establish from the regulatory authorities, e.g. Environment Agency and Natural England, the precise potential for hedge and tree enhancement and whether the developer's current proposals are adequate. Having formed and opinion on adequacy, and the regime to be established by the developer for the maintenance and delivery of hedges and trees, these matters and their enforcement should take the form of conditions of planning consent.	The Applicant notes these comments. A comprehensive package of habitat creation and enhancement measures, including new tree and hedgerow planting are shown in **ES Volume 2, Figure 3-4: Landscape and Ecological Mitigation Plan [APP-084]** and detailed in the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]**. The preparation, approval and implementation of the detailed Landscape and Ecological Management Plan, substantially in accordance with the **OLEMP [APP-283]**, are secured through Requirement 7 in Schedule 2 of the **Draft Development Consent Order [APP-016]**,

NWFOE-007	Soils and Agriculture	Agricultural Land Classification	The Inspectorate needs to establish the precise grading of the agricultural soils in the development area, e.g. Grade 1, 2 , 3a, 3b and 4. This grading needs to be verified by an authority independent of the developer. The Inspectorate needs to establish whether soils of Grade 3a and above should be excluded from development, and, if they are not to be excluded, the reasons for this decision, given that the existing planning rules prevent development of agricultural soils of Grade 3a and above. At the present time (2025) it is believed that around 20% of the soils in the development are potentially Grade 3a and above, hence the need for independent verification.	Agricultural land within the Order Limits has been subject to detailed Agricultural Land Classification (ALC) and soil survey work, undertaken by an experienced practitioner in accordance with published guidance and following consultation with Natural England. The survey methodology and results, including the extent of land within each ALC grade, are set out in **ES Volume 3, Appendix 17 1: Agricultural Land Classification and Soil Resource Survey Report [APP 243]**. The assessment identifies that a proportion of the land within the Scheme is classified as Best and Most Versatile (BMV) agricultural land, including Subgrade 3a. This information has informed the site selection and design, as detailed in **ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP 056],** and assessment of effects, as reported in **ES Volume 1, Chapter 17: Soils and Agriculture [APP 069]**. Neither national planning policy nor the relevant National Policy Statements preclude the use of BMV agricultural land for development. The assessment of effects on agricultural land therefore considers the significance of the effects and the balance of considerations in accordance with policy, rather than assuming the exclusion of land classified as Grade 3a or above. As shown in Table 2-2 of **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]**, the

				Applicant has considered previously developed land / brownfield land over 1 hectare within the area of search, based on the brownfield land registers of the relevant Local Planning Authorities, and concluded that none of the sites are large enough to provide a viable land parcel of at least 40 ha and sites were not considered to be available as they have planning permission for residential development and/or are allocated for residential/mixed use development.
NWFOE-008	Other Environmental Matters	BESS	The battery storage technology requires very careful examination by the Inspectorate. Lithium batteries carry a fire risk, which, should it occur at this site, is remote from the county Fire Brigade and served only by narrow lanes and limited fire fighting means, e.g. water. and chemical suppressants Thus, if lithium batteries are to be used, the Inspectorate need to establish both from the developer and the county Fire Brigade precisely how such a fire will be safely extinguished and the speed at which that can be achieved. If necessary, fire fighting equipment	As now mandated under NFPA 855 (2026) the Applicant will only be able to select a BESS system that has undertaken Large Scale Fire Testing (LSFT). At the detailed design stage, the selected BESS LSFT data will be leveraged to fully inform inputs for risk assessment tools which will be utilised together with detailed consequence modelling to provide a comprehensive site operations and emergency response safety audit, this is stipulated in the

			adequate to extinguish a fire at the time when it first arises should be a feature of planning consent, along with a fire-fighting plan to enable a fire to be extinguished should it not be immediately extinguished. It is to be noted that sodium batteries are generally regarded to be of a lower fire risk. Therefore, the Inspectorate needs to establish from the developer, the county Fire Brigade and other technical authorities the best technology for use in the battery storage system, and to make recommendations on conditions of planning consent in this regard.	OBSMP pre-construction requirements (Section 6). An **Outline Battery Safety Management Plan (OBSMP) [APP-286]** has been prepared for the Scheme using guidance from Dorset and Wiltshire Fire and Rescue Service and incorporating recommendations of the National Fire Chiefs Council. The safety objectives for the design of the BESS site are listed in Section 2.4 of the OBSMP. The OBSMP will be amended at Deadline 1 to fully accommodate the latest BESS safety requirements contained in NFPA 855 (2026) ensuring that any credible risks associated with battery storage are either prevented or fully mitigated if a BESS failure occurs. Section 2.4.2 of the OBSMP stipulates that: *"Final BESS design and site layout will have been validated through mandatory Large Scale Fire Testing (LSFT) and rigorous consequence modelling to minimise the requirement for any D&WFRS intervention in a thermal runaway incident. LSFT must establish minimum equipment spacing distances that demonstrate there is no fire propagation to adjacent BESS enclosures or ESS equipment. D&WFRS intervention in worst case scenarios would typically be limited to boundary cooling of adjacent BESS and Energy Storage System (ESS) units to prevent the fire from spreading. This strategy will be finalised with D&WFRS and be clearly communicated in the Emergency Response Plan (ERP);*

				• *To ensure that fire, smoke, and any release of toxic gases does not significantly impact site operatives, first responders, and the local community; and* • *To ensure that firewater run-off is contained and tested before release or, if necessary, removed by tanker and treated offsite."* Section 1.1.14 of the OBSMP stipulates: *"This document details the types of safety systems available on the market at present, along with risk reduction barriers which are likely to be incorporated into the system to be installed at Lime Down D. It is possible that by the time of construction that a new battery chemistry may be integrated but this would be fully tested and certified to the latest BESS safety standards and this will be reflected in the final BSMP approved by the relevant local planning authority in consultation with Dorset and Wiltshire Fire and Rescue Service (D&WFRS) and the Environment Agency (EA)."* As set out in the OBSMP, the BESS Area will have a robust and validated Emergency Response Plan (ERP), developed in consultation with Dorset & Wiltshire Fire and Rescue Service at the detailed design stage. Section 5.4 of the OBSMP specifies the typical emergency response protocols, procedures and safety information that will be included in ERPs. ERPs will be drafted and approved for all stages of the Scheme, including construction, operation and decommissioning. The Applicant's ERP template includes all requirements

				specified in both NFCC and NFPA 855 guidance and recommendations. Section 5 of the OBSMP covers all requisite firefighting requirements for the Scheme including fire service access, firefighting water supply, and emergency planning requirements. The Applicant is currently drafting a Statement of Common Ground (SOCG) with the Environment Agency (EA) on Scheme environmental protection issues including the BESS area drainage strategy. The agreed strategy document will be appended to the OBSMP at Deadline 1, to provide further assurance that all water pollution risks from a BESS fire are fully mitigated. The EA is a statutory consultee for the OBSMP and drainage strategies and must approve the final BSMP and drainage design at detailed design before construction of the BESS commences. The **OBSMP [APP-286]** is secured through Requirement 6 (Battery safety management) in Schedule 2 of the **Draft DCO [APP-016],** which provides that Work No. 2 must not commence until a Battery Safety Management Plan has been submitted to and approved by the relevant planning authority. The approved plan must be substantially in accordance with the Outline Battery Safety Management Plan. The Draft DCO also requires the relevant planning authority to consult with Dorset and Wiltshire Fire and Rescue Service and the Environment Agency before determining the application, and that the Battery Safety

				Management Plan must be implemented as approved.
NWFOE-009	Transport and Access	Cable Route	The laying of the cable from the main battery storage site at the development to the National Grid will be installed using horizontal tunnelling, and this tunnelling will require three, possibly more sites along the course of the cable's route to enable horizontal tunnelling equipment to operate. These sites have been identified by the developer, but they appear to occur in rural sites where access for the construction traffic is very limited and traffic volumes and impact on normal traffic patterns are unassessed. For example, two of these sites are within the parish of Chippenham Without, both of which are serviced by limited access - the Fowlswick lane /Yatton Keynell site, and the Stowells Farm site on the C road from Sheldon to Corsham. At the present time, neither site is assessed for traffic impact, noise impact, length of construction time on site, or on the manner of the restoration of the site following completion of installation of the cable. Therefore, the Inspectorate needs to interrogate the developer on all of these matters, to obtain an assessment from Wiltshire	As confirmed in **ES Volume 1, Chapter 3: The Scheme [APP-055]**, the cables within the Solar PV Site and Grid Connection Cables will be installed via a combination of open cut trenching and Horizontal Directional Drilling (HDD) with the latter used if needed to avoid and reduce adverse environmental effects. At this stage, 13 HDD locations (see **ES Volume 2, Figure 3-1 [APP-082]**) have been identified as required for the Scheme. Details regarding methodology for installing the cables is found in **ES Volume 3, Appendix 3-2: Cable Route Construction Method Statement [APP-183]**. The impact on the HDD locations on transport and access and noise and vibration have been assessed in **ES Volume 1, Chapter 13: Transport and Access [APP-065]** and **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**, respectively. These conclude that there are no significant impacts as a result of HDD with appropriate mitigation in place.

			Council on highways impact and environmental impact, particularly noise, and, if development is to be allowed, the precise terms and conditions that will operate at these sites, and how those terms and conditions will be enforced.	An **oCEMP [APP-277]** and **oCTMP [APP-287]** support the DCO Application and includes outline measures to ensure impacts from HDD and associated construction traffic are minimised as far as practicable. Links through both areas (Fowlswick lane /Yatton Keynell site, and the Stowells Farm site) are assessed within **ES Volume 1, Chapter 13: Transport and Access [APP-065]**. The impact of construction traffic generated by the Cable Route Corridor during construction is set out in Table 13-34. A final CEMP and CTMP would be prepared post consent and must be substantially in accordance with the **oCEMP [APP-277]** and **oCTMP [APP-287]** and approved by the relevant local planning authorities, as secured by Requirement 13 and 15 in Schedule 2 of the **Draft DCO [APP-016]**, respectively.
NWFOE-010	Cultural Heritage	Fosse Way and CNL	The development will impact on the Fosse Way (Roman road) and the Cotswolds Area of Outstanding Natural Beauty (AONB). The Inspectorate needs to obtain a clear understanding of the precise nature of the impact on both of these features because any adverse impact will be enduring and, at a minimum, for 60 years. The Inspectorate needs to interrogate the developer to establish whether this impact has been correctly assessed, and precisely what form the impact will take. And, the Inspectorate needs to obtain from the regulatory authorities e.g. Historic	The potential effects of the Scheme on the Roman Roads (i.e. the Fosse Way), as well as other Roman archaeological assets are fully assessed in **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, supported by detailed technical appendices in in **ES Volume 1 Chapter 8: Landscape and Visual**. Where an adverse effect has been identified to Roman archaeological assets appropriate mitigation is proposed. See Section 12.9 of **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]** for embedded mitigation and Section 12.11 for additional mitigation. An overarching archaeological

			England and National Parks Authority their own assessment of impact. If development is to be allowed, then a clear strategy of mitigation needs to be established in order to diminish the adverse impact. A mitigation strategy does not appear to exist at the present time. Therefore, the Inspectorate needs to establish the precise nature of the mitigation strategy, how it will be delivered by the developer, how it will be enforced by the regulators, and all such matters should be the subject of conditions of planning consent.	mitigation strategy is provided in **ES Volume 3, Appendix 12.6 Archaeological Mitigation Strategy [APP-230].** The visual effects of the Scheme on the Fosse Way have been undertaken within the LVIA in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060].** The Fosse Way runs adjacent to Sites B and C through the Scheme and is made of seven separate receptors which have been assessed in full. The Sequential effects for users of the Fosse Way are not considered to be any greater than those effects identified for the individual sections as set out within ES Volume 3, Appendix 8.3 ES LVIA Assessment Sheets. Moderate Adverse effects on Receptor No TR145: Fosse Way were identified as a result of Site C with no greater effects identified as a result of Site B. Refer to **ES Volume 3**, **Appendix 8-3-2-2-2 - Landscape and Visual Assessment Sheets [APP-191].** The Cotswolds National Landscape (CNL) is fully assessed as a standalone receptor within **ES Volume 3, Appendix 8.6: Assessment of Effects on the Special Qualities of the Cotswolds National Landscape [APP-197]**. This assessment considers the effects of the Scheme on landscape character, visual amenity and the special qualities of the CNL, including tranquillity. The assessment found that there would be some short term impact to landscape character within the setting of the CNL but due to the avoidance measures

				embedded within the Scheme, harm to the CNL itself would be minimal with beneficial effects in the long term which would further the purposes of the designation. In respect of visual amenity, some short-term adverse effects would be experienced by a small number of visual receptors with views to and from the CNL. However, these would reduce over time as a result of the proposed mitigation. The assessment of effects on the special qualities of the CNL scoped out 3 SQs as there is no association with the Site. The assessment found that there are no direct effects on the remaining SQs. There are some Minor/ Negligible short-term effects on a small number of visual receptors within the setting of the CNL which effect SQ7 -Tranquillity and SQ13 Archaeology and historic associations. However, these effects are mitigated by Year 15 when proposed vegetation has matured. The assessment also found that there would be beneficial effects on SQ 6 – Biodiversity and nature recovery as a result of the delivery of approximately 119.7 hectares of flower-rich neutral grassland (as defined in the BNG assessment) and SQ 12 - An accessible landscape as a result of the delivery of approximately 12.8km of new permissive paths within the setting of the CNL. The remaining SQs would remain entirely intact. The Scheme was refined through an iterative design process to avoid and reduce effects on the CNL and its setting. Panels along the edge of the CNL were removed from the Order Limits in fields

				C2, C3 and C4 where significant visual effects on receptors within the CNL were identified. Panels were also removed from fields C1, C6, C8, the western section of C9 and the majority of C10, with this land now proposed for ecological mitigation to protect the setting of the CNL. In addition, panels within fields A11 and A12 were removed and the land repurposed for ecological mitigation to protect the setting of the CNL towards Sherston. All land parcels adjacent to the CNL are proposed to deliver habitat enhancement, informed by the CNL Management Plan and the Cotswolds National Landscape Strategy and Guidelines, to further the purposes of the designation. Details of the proposed landscape and ecological mitigation and enhancement measures such as the avoidance measures to remove panels from the boundary of CNL are provided in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060], Figure 3-4-1 to 3-4-5.2 Landscape and Ecology Mitigation Plan [APP-084]** and secured within the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283],** and the **Outline Ecological Protection and Mitigation Strategy (EPMS) [APP-284]**. The preparation, approval and implementation of the detailed Landscape and Ecological Management Plan, substantially in accordance with the **OLEMP [APP-283]**, are secured through Requirement 7 in Schedule 2 of the **Draft Development Consent Order [APP-**

				016]. The preparation, approval and implementation of the detailed Ecological Protection and Mitigation Strategy, substantially in accordance with the **EPMS [APP-284]**, are secured through Requirement 8 in Schedule 2 of the **Draft Development Consent Order [APP-016]**. These requirements ensure that the identified mitigation and enhancement measures are delivered and maintained throughout the lifetime of the Scheme.

4.10 Campaign to Protect Rural England Wiltshire Branch

Table 4-10 RR-0576

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
CPREW-001	Landscape and Visual	Focus of Representation	Our concerns focus on the following issues. Landscape change. The cumulative industrialising effects of the panels and the BESS unit sites on the settings of the characteristic villages and farmsteads in this very rural area which is highly esteemed by visitors as much as the resident population. This includes the visual effects on the multiple rights of way corridors over the whole area.	The LVIA presented in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]** has been undertaken with consideration of the appropriate and relevant guidance and robustly assesses both the landscape and visual effects of the Scheme independently to ensure both the impacts and effects on the fabric and character of the landscape are taken into account as well as the views and visibility. The proposed mitigation is sensitive to the existing landscape and has been informed by the Landscape Character Assessment Guidelines [APP195] and Wiltshire's Nature Recovery Strategy to

				protect and enhance the landscape through the landscape- led design. Table 8-20 of the LVIA in **[APP-060**] recognises that there are some visual effects on PRoW receptors which cannot be mitigated. These predominantly are associated with footpaths which diagonally cross fields within the Scheme where new hedgerows to form screening would be inappropriate to landscape character and the legacy landscape.
CPREW-002	Landscape and Visual	Mitigation	Mitigation in the form of new plantings to mask the industrialising of the fields introduces an unnatural element. It does not act for any agricultural motive, unlike historical hedge boundaries and field shelter belts. In 60 years these will have permanently changed the landscape.	As noted above the LVIA presented in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]** the proposed mitigation has been designed to be sensitive to the existing landscape character and has been informed by the Landscape Character Assessment Guidelines set out in **ES Volume 3, Appendix 8-4: Landscape Character Area Descriptions [APP-195]** and Wiltshire's Nature Recovery Strategy to protect and enhance the landscape through the landscape- led design. Measures to avoid uncharacteristic or harmful mitigation Have been avoided. As noted above, Table 8-20 of the LVIA in **[APP-060]** recognises that there are some visual effects on PRoW receptors which cannot be mitigated. These predominantly are associated with footpaths which diagonally cross fields within the Scheme where new hedgerows to form screening

				would be inappropriate to landscape character and the legacy landscape.
CPREW-003	Hydrology, Flood Risk and Drainage	Drainage and Surfaces	Drainage and Surfaces. The quality of the agricultural soils as a result of radical change to the surface of the fields is unknown. What the effect of the panels and the control of surface drainage will be over a 60 years period is purely speculative.	The Applicant does not agree that the effects of the Scheme on surface drainage over the operational period are speculative. The assessment in **Environmental Statement Chapter 11 Hydrology, Flood Risk and Drainage [APP-063]** demonstrates that solar PV arrays are elevated and allow rainfall to drain to ground beneath and between panels, maintaining existing drainage pathways. The introduction of permanent grass cover and elimination of trafficking improves infiltration capacity and soil structure relative to the existing arable baseline. National policy recognises that ground-mounted solar PV generally drains to ground and does not create significant drainage impacts where ground cover is maintained (NPS EN-3 paragraph 3.10.75). The assessment is informed by published research including Cook and McEwan (2013), which demonstrates that vegetated solar arrays do not result in significant increases in runoff volumes or peak discharge over operational lifetimes. Drainage controls for supporting infrastructure are secured through Requirements in the **Draft Development**

				Consent Order [APP-016], with ongoing grassland management secured through the **Outline Landscape and Ecological Management Plan [APP-283]**. Soil quality effects are addressed separately in the soils and agriculture assessment. No amendments to the application documents are required.

CPREW-004	Soils and Agriculture	Loss of Productive Agricultural Land	Loss of productive agricultural land. At a time of rapid climate change all such land should be protected for food security. To say it will be returned to its present state in 60 years is irrelevant as the need for land for food will be in the next two decades. New ways of generating power are rapidly coming on stream through technology but there is no way of creating new food producing land for the current population let alone the predicted increase.	The effects of the Scheme on agricultural land, including Best and Most Versatile (BMV) land, are assessed in **ES Volume 1, Chapter 17: Soils and Agriculture [APP 069],** supported by **ES Volume 3, Appendix 17 1: Agricultural Land Classification and Soil Resource Survey Report [APP 243].** That assessment identifies that the Scheme will result in significant adverse effects on BMV agricultural land, arising from the temporary and reversible loss of BMV land during the operational period, with land reinstated and returned to agricultural use as far as practicable following decommissioning. The assessment of effects on food production and food security is considered within the Environmental Statement and supporting policy context. National evidence cited within the application recognises that solar development occupies a very small proportion of UK land and that food security is influenced by a range of factors beyond land take, including climate change, soil degradation and wider environmental pressures. Agricultural land quality is therefore one of several sustainability considerations relevant to the Scheme. The consideration of alternatives, including the availability and suitability of land of lower agricultural quality, is set out in **ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP-056]** and **ES Volume 3, Appendix 4 1: Site Selection Assessment Report [APP-**

				185]. This assessment explains how alternative sites, including areas of brownfield land and lower grade agricultural land, were considered in accordance with planning policy.

4.11 EATDRINKSLEEP

Table 4-11 RR-1221

Reference	Theme	Subtheme	Comments/Issues Raised	Applicant's Response
EDS-001	Description and DCO Process	Introduction	I am writing on behalf of EATDRINKSLEEP the company behind dining pubs with rooms in Cornwall and Wales. Our venues are deliberately located in areas of the countryside, chosen for their landscape quality, tranquillity, and access to well-used walking routes that are central to our guests' experience.	The Applicant notes this comment and has responded to EATDRINKSLEEPs response in full below.
EDS-002	Description and DCO Process Socio-Economics, Tourism and Recreation Landscape and Visual	Impacts to Tourism, Business, and Access to the Countryside	We object to the Lime Down Solar proposal due to its significant and adverse impact on rural tourism, local businesses, public access, and the character of the countryside.	<u>Tourism</u> The potential effects of the Scheme on tourism and recreation are assessed in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]**, supported by **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241].** The assessment considers baseline tourism activity, visitor attractions, recreational assets and tourism-dependent businesses within the Study Area. The assessment evaluates potential effects on the use, enjoyment and desirability of nearby tourism destinations, including impacts on individual visitor attractions, recreational routes, events and businesses reliant on tourism. It also considers whether changes to landscape character or visual amenity could influence visitor behaviour. The assessment identifies a worst-case scenario in which a temporary loss of up to 50 tourism-related jobs could occur locally during construction, and a long-term loss of up to 11 tourism-related jobs could occur during the operational phase of the Scheme. This represents a precautionary

Reference	Theme	Subtheme	Comments/Issues Raised	Applicant's Response
				estimate based on conservative assumptions. The assessment concludes that, while some localised effects on tourism receptors are anticipated to occur, significant adverse effects on the wider tourism economy are not anticipated. These findings are fully reported in the ES and will be weighed in the planning balance alongside the Scheme's wider economic and environmental benefits. The Applicant is discussing the approach to assessment of tourism impacts with Wiltshire Council's Economic and Regeneration Team and those discussions will be set out in the Statement of Common Ground with Wiltshire Council to be submitted at Deadline 1. <u>Local Businesses</u> An assessment of the likely effects of the Scheme on the local economy and employment is provided in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068].** This chapter considers potential impacts on construction and engineering sectors, agricultural activity, tourism-related businesses, and wider local economic conditions during construction, operation and decommissioning. Supporting evidence is provided in **ES Volume 3, Appendix 16-3: Socio-Economics, Tourism and Recreation – Summary of Non-Significant Effects [APP-242]**, which summarises that effects on the local economy and economic prosperity are assessed as negligible to minor beneficial, with construction expenditure and employment generation contributing positive, temporary effects on local economic activity.

Reference	Theme	Subtheme	Comments/Issues Raised	Applicant's Response
				The assessment therefore concludes that the Scheme would not result in significant adverse effects on local businesses or the wider local economy, and that socio-economic benefits, including job creation and local supply-chain opportunities, are expected during the construction phase, with more modest economic and skills and supply chain opportunities during the operational phase. The Applicant notes that the approach to assessment of socio-economic effects has been agreed with Wiltshire Council's Economic and Regeneration Team, with the exception of matters relating to agricultural employment, which the Applicant is discussing with the team. This discussion is set out in the Statement of Common Ground with Wiltshire Council to be submitted at Deadline 1. <u>Public access</u> A detailed assessment of the likely significance of effects from the Scheme on the use and desirability of individual PRoWs and recreational access to the countryside is included in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** and **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]**. This assessment considers the impact on individual recreational routes, including their practical use, enjoyment and desirability. The assessment finds no significant residual effects to individual PROWs or the PROW network overall. However, residual significant effects are anticipated to some long-distance recreation routes during all phases of the Scheme due to their regional or national importance. The assessment in **ES Volume 1, Chapter 18: Human Health [APP-070]** goes on to assess the physical and mental health impacts of changes to recreation and

Reference	Theme	Subtheme	Comments/Issues Raised	Applicant's Response
				countryside access under the assessment topic 'open space, leisure and play', finding that no significant adverse effects are anticipated at any phase of the Scheme. The Applicant notes that the approach to recreation and access to the countryside has been agreed with Wiltshire Council's Public Health team and the Applicant is discussing this approach with Wiltshire Council's Countryside Access Team. This discussion is set out in the Statement of Common Ground with Wiltshire Council to be submitted at Deadline 1. <u>Landscape</u> An assessment of landscape and visual effects are presented in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**. The Landscape and Visual Impact Assessment (LVIA) assesses effects on identified landscape and visual receptors, including residential properties, users of public rights of way and roads, and identifies where significant effects may occur. The LVIA found no significant long term visual effects to residential properties as a consequence of the Scheme. The visual effects of the Scheme are summarised in **ES Volume 3, Appendix 8-3-3 [APP-192]**. Temporary Major/Moderate and Moderate Adverse effects on visual receptors have been recorded across the Scheme during construction and at Year 1. However, for the majority of these receptors, the effects reduce to non –significant levels as a result of the embedded mitigation measures which are set out in Section 8.9 of **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]** and include landscape buffers, retention of existing hedgerows and

Reference	Theme	Subtheme	Comments/Issues Raised	Applicant's Response
				woodland, and new planting to provide screening and integration over time. The assessment also identifies that there would be some long-term significant effects on the visual amenity of users of some localised footpaths, as a result of the Scheme. This predominantly relates to locations where footpaths diagonally cross fields and mitigation planting would be inappropriate to landscape character and the legacy landscape. Those receptors which would experience Significant Long Term Visual Effects are listed in Table 8-30 of the **LVIA [APP-060].** The scale of development within the Order Limits has been significantly reduced from the layout assessed in the Preliminary Environmental Information Report (PEIR) through an iterative design process undertaken in response to consultation and in accordance with the mitigation hierarchy to avoid, reduce and mitigate adverse effects. As part of this design evolution, panels along the edge of the Cotswolds National Landscape and along the Fosse Way have been removed. Mitigation measures to address landscape and visual effects are set out in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**, **Figure 3-4-1 to 3-4-5.2 Landscape and Ecology Mitigation Plan [APP-084]** and secured within the **Outline Landscape and Ecological Mitigation Plan (LEMP) [APP-283]** and the **Outline Ecological Protection and Mitigation Strategy (EPMS) [APP-284]**. These documents include proposals for new and enhanced planting, retention of existing hedgerows and woodland, and landscape integration measures to reduce visual effects over time. In addition, the Scheme design incorporates minimum offsets from existing landscape features, including residential properties, ancient

Reference	Theme	Subtheme	Comments/Issues Raised	Applicant's Response
				woodland, woodland, hedgerows, public rights of way and watercourses, to further limit visual impacts. Although these measures reduce the effects of the Scheme on nearly all receptors, as noted above there are 10 receptors which would experience Significant Visual Effects for the duration of the Scheme as set out Table 8-30 of the **LVIA [APP-060]**. Mitigation measures to address landscape and visual effects are set out in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**, **Figure 3-4-1 to 3-4-5.2 Landscape and Ecology Mitigation Plan [APP-084]**. The preparation, approval and implementation of detailed landscape and ecological management plans, substantially in accordance with the **OLEMP [APP-283]** and **EPMS [APP-284]**, are secured through requirements in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that the identified mitigation measures are delivered and maintained throughout the lifetime of the Scheme.
EDS-003	Landscape and Visual	Landscape Character	Our business model relies on visitors who actively seek unspoilt landscapes, peaceful walking routes, and an authentic rural environment. The proposed immense scale of the Lime Down Solar development with 650,000 panels, 4.5m high and their associated infrastructure, fencing, and service roads — would fundamentally alter and ruin the landscape character of the area.	An assessment of landscape and visual effects are presented in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**. The Landscape and Visual Impact Assessment (LVIA) assesses effects on identified landscape and visual receptors, including residential properties, users of public rights of way and roads, and identifies where significant effects may occur. The LVIA found no significant long term visual effects to residential properties as a consequence of the Scheme. The visual effects of the Scheme are summarised in **ES Volume 3, Appendix 8-3-3 [APP-192]**. Temporary Major/Moderate and Moderate Adverse effects on visual receptors have been recorded across the Scheme

Reference	Theme	Subtheme	Comments/Issues Raised	Applicant's Response
				during construction and at Year 1. However, for the majority of these receptors, the effects reduce to non –significant levels as a result of the embedded mitigation measures which are set out in Section 8.9 of **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]** and include landscape buffers, retention of existing hedgerows and woodland, and new planting to provide screening and integration over time. The assessment also identifies that there would be some long-term significant effects on the visual amenity of users of some localised footpaths, as a result of the Scheme. This predominantly relates to locations where footpaths diagonally cross fields and mitigation planting would be inappropriate to landscape character and the legacy landscape. Those receptors which would experience Significant Long Term Visual Effects are listed in Table 8-30 of the **LVIA [APP-060].** The scale of development within the Order Limits has been significantly reduced from the layout assessed in the Preliminary Environmental Information Report (PEIR) through an iterative design process undertaken in response to consultation and in accordance with the mitigation hierarchy to avoid, reduce and mitigate adverse effects. As part of this design evolution, panels along the edge of the Cotswolds National Landscape and along the Fosse Way have been removed. Mitigation measures to address landscape and visual effects are set out in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**, **Figure 3-4-1 to 3-4-5.2 Landscape and Ecology Mitigation Plan [APP-084]** and secured within the **Outline Landscape and Ecological Mitigation Plan (LEMP) [APP-283]** and the **Outline Ecological Protection and Mitigation Strategy (EPMS) [APP-284]**. These documents include proposals for new and enhanced planting, retention of

Reference	Theme	Subtheme	Comments/Issues Raised	Applicant's Response
				existing hedgerows and woodland, and landscape integration measures to reduce visual effects over time. In addition, the Scheme design incorporates minimum offsets from existing landscape features, including residential properties, ancient woodland, woodland, hedgerows, public rights of way and watercourses, to further limit visual impacts. Although these measures reduce the effects of the Scheme on nearly all receptors, as noted above there are 10 receptors which would experience Significant Visual Effects for the duration of the Scheme as set out Table 8-30 of the **LVIA [APP-060]**. Mitigation measures to address landscape and visual effects are set out in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**, **Figure 3-4-1 to 3-4-5.2 Landscape and Ecology Mitigation Plan [APP-084]**. The preparation, approval and implementation of detailed landscape and ecological management plans, substantially in accordance with the **OLEMP [APP-283]** and **EPMS [APP-284]**, are secured through requirements in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that the identified mitigation measures are delivered and maintained throughout the lifetime of the Scheme.
EDS-004	Socio-Economics, Tourism and Recreation	Tourism	This change would directly undermine the very qualities that attract visitors.	The potential effects of the Scheme on tourism and recreation are assessed in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]**, supported by **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]**. The assessment considers baseline tourism activity, visitor attractions, recreational assets and tourism-dependent businesses within the Study Area.

Reference	Theme	Subtheme	Comments/Issues Raised	Applicant's Response
				The assessment evaluates potential effects on the use, enjoyment and desirability of nearby tourism destinations, including impacts on individual visitor attractions, recreational routes, events and businesses reliant on tourism. It also considers how changes to landscape character or visual amenity (as assessed in **ES Volume 1 Chapter 8: Landscape and Visual Impact [APP-060]** as a result of the Scheme are anticipated to influence visitor behaviour. The assessment acknowledges the Scheme is likely to have an adverse effect on the tourism economy overall, however this is not anticipated to be a significant effect at any phase of the Scheme.
EDS-005	Socio-Economics, Tourism and Recreation	Tourism	Importantly, the owners of EATDRINKSLEEP had been actively considering investment in this area, including potential acquisition and development opportunities. That interest has now been withdrawn. The reason is clear: guests will not choose to visit locations where countryside views are dominated by industrial-scale solar installations, walking routes are reduced or compromised, and construction and maintenance traffic increases pressure on narrow rural roads.	The potential effects of the Scheme on tourism and recreation are assessed in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068],** supported by **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]**. This assessment considers the changes to landscape character or visual amenity, changes to the use and desirability of PROWs and recreational routes, and the impacts of HGV and other Scheme-generated traffic on the local road network. The Applicant has sought to ensure this assessment is robust and allows any stakeholders to gain an understanding of the likely worst case effects the Scheme may generate. The Applicant seeks to reinforce that the likely effects to tourism receptors are based on embedded mitigation only and does consider additional mitigation secured by the requirements in Schedule 2 to the **Draft DCO [APP-016].**

Reference	Theme	Subtheme	Comments/Issues Raised	Applicant's Response
EDS-006	Socio-Economics, Tourism and Recreation	Recreational Amenity	We are particularly concerned about: Loss of walking appeal: Public footpaths and informal walking routes are a primary driver of overnight stays and repeat visits. The perceived and actual loss of open countryside will significantly reduce footfall.	The Applicant confirms that impacts to PRoW, unsurfaced roads, and the recreational use of the highway network have been assessed in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** and the supporting **ES Volume 3 Appendix 16-2 Tourism and Recreation Receptor Tables [APP-241]**. The Applicant confirms that the majority of significant adverse effects can be appropriately mitigated through landscaping, traffic control and PROW protections set out in the management plans secured by the requirements in Schedule 2 to **the Draft DCO [APP-016]**. However, the Applicant confirms that some significant adverse effects to users of individual routes in Lime Down E cannot be mitigated further during construction. The assessment has considered the impacts to individual routes to build a picture of the likely impact on the overall PRoW and highway network, determining that the overall effects within the 2 km Study Area is not a significant adverse effect at any stage of the Scheme. This is largely owing to the large number of PRoW and rural routes, giving a great level of optionality to users, even in the presence of the Scheme.
EDS-007	Landscape and Visual	Visual Impact	Visual and experiential harm: Solar infrastructure at this scale represents an industrial intrusion into a valued rural setting, changing how the area is experienced by residents and visitors alike.	An assessment of landscape and visual effects are presented in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**. The Landscape and Visual Impact Assessment (LVIA) assesses effects on identified landscape and visual receptors, including residential properties, users of public rights of way and roads, and identifies where significant effects may occur. The LVIA found no significant long term visual effects to residential properties as a consequence of the Scheme. The visual effects of the Scheme are summarised in **ES Volume 3, Appendix 8-3-3 [APP-192]**. Temporary

Reference	Theme	Subtheme	Comments/Issues Raised	Applicant's Response
				Major/Moderate and Moderate Adverse effects on visual receptors have been recorded across the Scheme during construction and at Year 1. However, for the majority of these receptors, the effects reduce to non –significant levels as a result of the embedded mitigation measures which are set out in Section 8.9 of **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]** and include landscape buffers, retention of existing hedgerows and woodland, and new planting to provide screening and integration over time. The assessment also identifies that there would be some long-term significant effects on the visual amenity of users of some localised footpaths, as a result of the Scheme. This predominantly relates to locations where footpaths diagonally cross fields and mitigation planting would be inappropriate to landscape character and the legacy landscape. Those receptors which would experience Significant Long Term Visual Effects are listed in Table 8-30 of the **LVIA [APP-060].** The scale of development within the Order Limits has been significantly reduced from the layout assessed in the Preliminary Environmental Information Report (PEIR) through an iterative design process undertaken in response to consultation and in accordance with the mitigation hierarchy to avoid, reduce and mitigate adverse effects. As part of this design evolution, panels along the edge of the Cotswolds National Landscape and along the Fosse Way have been removed. Mitigation measures to address landscape and visual effects are set out in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**, **Figure 3-4-1 to 3-4-5.2 Landscape and Ecology Mitigation Plan [APP-084]** and secured within the **Outline Landscape and Ecological Mitigation Plan (LEMP) [APP-283]** and the **Outline Ecological Protection and Mitigation**

Reference	Theme	Subtheme	Comments/Issues Raised	Applicant's Response
				Strategy (EPMS) [APP-284]. These documents include proposals for new and enhanced planting, retention of existing hedgerows and woodland, and landscape integration measures to reduce visual effects over time. In addition, the Scheme design incorporates minimum offsets from existing landscape features, including residential properties, ancient woodland, woodland, hedgerows, public rights of way and watercourses, to further limit visual impacts. Although these measures reduce the effects of the Scheme on nearly all receptors, as noted above there are 10 receptors which would experience Significant Visual Effects for the duration of the Scheme as set out Table 8-30 of the **LVIA [APP-060]**. Mitigation measures to address landscape and visual effects are set out in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**, **Figure 3-4-1 to 3-4-5.2 Landscape and Ecology Mitigation Plan [APP-084]**. The preparation, approval and implementation of detailed landscape and ecological management plans, substantially in accordance with the **OLEMP [APP-283]** and **EPMS [APP-284]**, are secured through requirements in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that the identified mitigation measures are delivered and maintained throughout the lifetime of the Scheme.
EDS-008	Noise and Vibration	Noise Pollution	Noise pollution: the construction noises will make the area unbearable to live in and were Lime Down to go ahead the continual buzzing and whirring of the panels, the converters and the batteries	An assessment of the effects of the Scheme on noise and vibration is provided in **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**, with supporting technical information supplied in **ES Volume 3, Appendix 14-4: Noise Modelling [APP-237]**. The assessment considers potential noise and vibration impacts during construction, operation and decommissioning, including from Solar PV

Reference	Theme	Subtheme	Comments/Issues Raised	Applicant's Response
			would completely override the tranquility of the area.	Panels and associated infrastructure. The Applicant notes that the approach to noise and vibration has been discussed with Wiltshire Council, as described in Section 14.2 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066].** Construction phase The noise and vibration impacts arising from construction activities are assessed in Section 14.10 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**. For the purposes of the assessment, a reasonable worst-case scenario assuming piling activities has been considered. Mitigation measures associated with construction activity are presented in Section 14.9 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]** and are committed to through the **Outline Construction Environmental Management Plan (OCEMP_ [APP-277].** With these measures in place, the assessment concludes that no significant effects from construction noise or vibration are expected. A noise monitoring programme agreed with Wiltshire Council will be carried out during construction. The preparation, approval and implementation of the Construction Environmental Management Plan, substantially in accordance with the **Outline CEMP [APP-277],** is secured through Requirement 13 in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that construction noise and vibration are appropriately controlled. Operational phase The noise impacts from the operation of the Scheme and its components are assessed in Section 14.10 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066],** with

Reference	Theme	Subtheme	Comments/Issues Raised	Applicant's Response
				supporting modelling provided in **ES Volume 3, Appendix 14-4: Noise Modelling [APP-237].** A penalty has been applied to predicted noise levels from the Solar PV Sites to account for the distinctive nature of the sound. Potential mitigation measures are detailed in Section 14.9 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**, and with such measures in place, significant effects from operational noise are not expected. The **Outline Operational Environmental Management Plan (OCEMP) [APP-278]** commits to noise levels from the Scheme at residential dwellings being the same as or below those modelled in the ES. This provides assurance that significant effects from operational noise will be avoided, while allowing flexibility in how this is achieved. The preparation, approval and implementation of the detailed OEMP, substantially in accordance with the outline operational environmental management plan, are secured through Requirement 14 of Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring operational noise is appropriately controlled throughout the lifetime of the Scheme.
EDS-009	Transport and Access	Traffic Impact	Traffic and disruption: Increased construction and operational traffic will detract from the peaceful rural environment and negatively affect both visitors and local communities.	The potential effects of construction traffic on the local highway network are assessed in **ES Volume 1, Chapter 13: Transport and Access [APP-065]**, which considers construction vehicle movements, traffic volumes, road safety and effects on road users. This concludes that there would be negligible to minor adverse effects to the highway network which are non-significant. Construction vehicle movements will be managed through a Construction Traffic Management Plan. An **Outline Construction Traffic Management Plan (CTMP) [APP-287]** has been prepared and submitted with the DCO

Reference	Theme	Subtheme	Comments/Issues Raised	Applicant's Response
				application. The aim of the CTMP is to ensure that the effect of the construction phase on the local highway network is minimised. The **Outline CTMP [APP-287]** sets out measures to coordinate construction deliveries by HGVs to arrive and depart between 09:30 and 16:30 where possible, to avoid peak network hours of 08:00–09:00 and 17:00–18:00. It also includes a community liaison element to keep local communities informed about the construction process and to provide a contact for feedback should any issues arise. Compliance with the CTMP will be monitored by the Developer, Contractor and Wiltshire Council as local highway authority. The preparation, approval and implementation of the detailed CTMP, substantially in accordance with the outline CTMP, are secured through Requirement 15 of Schedule 2 of the **Draft Development Consent Order [APP-016],** ensuring construction traffic impacts are appropriately managed throughout the construction phase of the Scheme. Operational and maintenance vehicle types and movements are quantified in Section 13.10 of **ES Volume 1, Chapter 13: Transport and Access [APP-065]**. They will not give rise to any residual significant effects, in line with relevant thresholds set out in the ISEP Guidelines 2023. Measures from the **OCTMP [APP-287]** will be implemented during the programme of replacement for the Solar PV Panels, Conversion Units, and BESS Batteries during the operational and maintenance phase.
EDS-010	Socio-Economics,	Tourism	Economic harm: Hospitality and tourism businesses depend on landscape quality. This proposal	The Applicant confirms the assessment in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** has identified employment and economic losses

Reference	Theme	Subtheme	Comments/Issues Raised	Applicant's Response
	Tourism and Recreation		risks long-term damage to the rural visitor economy, with fewer visitors, reduced spending, and lost investment opportunities.	to tourism as a result of the Scheme. These are worst-case estimates based on the likely significance of effects from the Scheme, and do not account for additional mitigation measures being applied. The Applicant does not consider that these effects on tourism employment (loss of up to 50 FTE jobs) and economic value (loss of up to £1.76 million per annum during construction) are significant, accounting for approximately 0.17% of tourism employment and less than 0.15% of the value of the combined tourism industry value across Wiltshire (Visit Wiltshire, 2021). This is also a temporary effect, anticipated to occur during construction, with recovery to tourism businesses anticipated to begin as soon as construction works are complete. Additional mitigation measures through the **Outline Skills, Supply Chain and Employment Plan [APP-285]** seek to reduce tourism employment losses through focussing on local recruitment, promoting local suppliers where practicable, and through providing retraining opportunities for workers in agriculture or tourism-dependent industries. The Applicant seeks to clarify that the measures in the **Outline Skills, Supply Chain and Employment Plan [APP-285]** are intended to be implemented throughout construction and the operational lifetime of the Scheme to support ongoing skills and employment opportunities. While retraining opportunities would largely focus on disciplines related to the Scheme (such as engineering, logistics, and land management), retraining into other industries adjacent or similar to agriculture or tourism-based employment is not excluded from this offer.
EDS-011	Description and DCO Process	Conclusion	While we support the transition to renewable energy, it must be delivered in a way that is	The Scheme has been designed to deliver the greatest possible benefit from the available land and the available grid connection, whilst avoiding, minimising and/or

Reference	Theme	Subtheme	Comments/Issues Raised	Applicant's Response
			proportionate, sensitively sited, and does not sacrifice thriving rural economies and public enjoyment of the countryside. The immense scale of Lime Down is completely inappropriate for the area.	mitigating harmful environmental effects. As per the description set out in **ES Volume 1, Chapter 3: The Scheme [APP-055]** the total area within the DCO Order Limits encompasses approximately 1,237 hectares (ha). Of this, the 'Solar PV Sites' comprise approximately 749.1 ha of land. Around 479.5 ha of this land is proposed as being required for installation of solar PV, battery storage, and associated infrastructure. The remaining 269.5 ha would provide areas dedicated to ecological mitigation, measurable Biodiversity Net Gain (BNG) delivery, landscaping, offsets and agricultural land managed for environmental enhancement and habitat creation. The Applicant remains committed to delivering a Scheme that makes a meaningful contribution to the UK's transition to net zero, while also seeking to minimise adverse impacts and maximise opportunities for environmental enhancement and community benefits. As to the siting of the Scheme, further details on site selection, including a discussion of other alternatives considered, is set out in **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185].** The report explains how the Applicant has sought to avoid the most constrained land (such as land within the Cotswolds National Landscape and the highest grades of agricultural land where possible) and the factors that have been considered when selecting the site. The report concludes that there are no more suitable and available locations within the 20km search area than the proposed location for the Scheme. The Scheme's location is assessed to be suitable for the scale of solar development proposed and the basis on which the Applicant has selected the Solar PV Sites accords with the duty to consider alternatives as set out in NPS EN-1 and NPS EN-3.

Reference	Theme	Subtheme	Comments/Issues Raised	Applicant's Response
				The scale of development within the Order Limits has been significantly reduced from the layout assessed in the Preliminary Environmental Information Report (PEIR) through an iterative design process undertaken in response to consultation and in accordance with the mitigation hierarchy to avoid, reduce and mitigate adverse effects. As part of this design evolution, panels along the edge of the Cotswolds National Landscape and along the Fosse Way have been removed. Regarding impacts of the Scheme on rural communities and public enjoyment of the countryside, assessments set out in the various chapters of the **ES [APP-052 to APP-265]** detail what impacts are expected as a result of the Scheme based on the minimum and maximum parameters of the Scheme, and the mitigation and enhancement measures that are proposed to reduce these impacts. The potential effects of the Scheme on tourism and recreation are assessed in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]**, supported by **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]**. The assessment considers baseline tourism activity, visitor attractions, recreational assets and tourism-dependent businesses within the study area. The assessment acknowledges the Scheme is likely to have an adverse effect on the tourism economy, and while some localised effects on tourism receptors are anticipated to occur, overall, there is not anticipated to be a significant effect on the wider tourism economy. Additional mitigation measures through the **Outline Skills, Supply Chain and Employment Plan [APP-285]** seek to reduce tourism employment losses through focussing on local recruitment, promoting local suppliers where practicable, and through providing retraining opportunities for workers in tourism-dependent industries. A detailed skills, supply chain and employment

Reference	Theme	Subtheme	Comments/Issues Raised	Applicant's Response
				plan for each part of the authorised development (substantially in accordance with the **Outline Skills, Supply Chain and Employment Plan [APP-285]**) must be submitted to and approved by the local planning authority before that part of the authorised development may commence. This approach is secured by Requirement 18 in Schedule 2 to the **Draft DCO [APP-016]**. Impacts on mental health and wellbeing are assessed in **ES Volume 1, Chapter 18: Human Health [APP-070]**. This chapter provides a comprehensive assessment of the Scheme's potential effects on human health, including mental health and wellbeing, through consideration of a broad range of health determinants. These include access to open space and recreation, transport and connectivity, community identity and cohesion, employment and income, noise and vibration, air quality, and access to health and social care services. The assessment applies a health "*lens*" to the findings of relevant technical chapters and concludes that, with embedded mitigation and additional measures secured, the Scheme would not give rise to significant adverse effects on population health, including mental health and wellbeing. Mitigation measures to address landscape and visual effects are set out in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**, Figure 3-4-1 to 3-4-5.2 **Landscape and Ecology Mitigation Plan [APP-084]** and detailed within **the Outline Landscape and Ecological Mitigation Plan (OLEMP) [APP-283]** and **the Outline Ecological Protection and Mitigation Strategy (OEPMS) [APP-284]**. These documents include proposals for new and enhanced planting, retention of existing hedgerows and woodland, and landscape integration measures to reduce visual effects over time.

Reference	Theme	Subtheme	Comments/Issues Raised	Applicant's Response
EDS-012	Description and DCO Process	Conclusion	For these reasons, we strongly urge the planning authority to refuse this application to prevent irreversible harm to local businesses, tourism, and public access to the countryside. Yours faithfully, Philippa Hodson, onbehalf of EATDRINKSLEEP	The Applicant confirms that these matters have been addressed in detail in the responses above.
EDS-013	Description and DCO Process	Conclusion	I am writing on behalf of EATDRINKSLEEP the company behind dining pubs with rooms in Cornwall and Wales. Our venues are deliberately located in areas of the countryside, chosen for their landscape quality, tranquillity, and access to well-used walking routes that are central to our guests' experience.	The Applicant notes this comment and has responded to EATDRINKSLEEPs response in full below.

4.12 Norton Parochial Church

Table 4-12 RR-3560

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
NPC-001	Cultural Heritage	All Saints Church	All Saints Church, Norton is a Grade 1 listed building with foundations dating back to the 12th century. It is part of a group of eight ancient churches in the Gauzebrook Group benefice. These churches are linked by the Athelstan Pilgram Way walking and cycling trails, drawing visitors who currently enjoy the rural landscapes. These landscapes will be physically and visually fragmented by the proposed project, which cuts through the benefice and encircles much of Norton parish. These changes are likely to reduce total visitors to our church, lowering donations.	The Grade I Listed Church of All Saints and associated monuments (NHLE: 1023214 and 1199000) is situated approximately 440m south and approximately 880m east of Lime Down B at its nearest points, and approximately 250m north of Lime Down D at its nearest points. Since the design presented at PEIR stage, Solar PV Panels have been removed entirely from within Fields B1-B5, with the nearest panels situated within Fields B9 and B10 to the north and Fields D19-D21 to the south. No significant effects have been identified as a result of the Scheme to the Church of All Saints (see **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, supported by **Volume 3, Appendix 12.1: Heritage Statement [APP-219]**) The sequential effects of scheme on the Pilgrim Way have been assessed within the LVIA in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060**], Panels in field B2 –B5, along the Fosse Way which connects to the Pilgrim Way near Norton, were removed from the Scheme at the PEIR stage following consultation. As a result of this, the visual impact of the Scheme on the Pilgrim Way and any perceived fragmentation has significantly reduced.
NPC-002	Socio-Economics, Tourism and Recreation	Recreational Activity	The project will also adversely impact key fundraising events such as the Wiltshire Historic Churches Ride and Stride.	PRoW such as bridleways and byways and the use of the highway network for recreational users have been considered as specific recreational receptors in the assessment in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]**. The likely effects on individual PRoW are specifically assessed in **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]**. This assessment covers each phase of the Scheme: construction, operation, peak replacement works, and decommissioning, and is based on likely visual and amenity impacts, traffic movements, and changes to the usability and desirability of PRoW. The Applicant confirms that the majority of significant adverse effects can be mitigated, however understands that some significant adverse effects to users of routes in Lime Down E cannot be mitigated further during construction. No

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				significant residual effects are anticipated during the operational phase of the Scheme. The Applicant has committed to ensuring the operation or recreational use of PRoW is protected as much as possible through the implementation of embedded and additional mitigation measures set out in the **OCTMP [APP-287]** and **OPROWPPMP [APP-282]**, secured respectively by Requirements 15 and 16 in Schedule 2 to the **Draft DCO [APP-016]**. The Applicant therefore considers that the Scheme would not cause significant detriment to the ability for The Wiltshire Historic Churches Ride and Stride to take place or continue fundraising in future.

4.13 Foxley Road Nurseries

Table 4-13 RR-1454

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
FRN-001	Description and DCO Process	Introduction	We own a family run nursery supplying plants primarily to local customers for them to improve the environment and biodiversity in which they live. Giving Lime Down permission would have a huge adverse effect on our business, in particular:	The Applicant notes this comment and has addressed individual concerns below.
FRN-002	Transport and Access	Traffic Impact	Traffic Additional traffic/roadworks will deter customers from visiting us. I know from previous experience this will continue to have a major effect on customer footfall long after any delays are resolved. It will also make life very difficult for our incoming deliveries.	The Applicant has undertaken an assessment of potential transport and access impacts of the Scheme in **ES Volume 1, Chapter 13: Transport and Access [APP-065]**. This included the capacity of local roads and infrastructure to accommodate construction vehicles with consideration of construction traffic volumes, vehicle types, route suitability, and network performance. The assessment concludes the Scheme is not likely to result in any significant residual Transport and Access effects during the construction, operation and decommissioning phases. An **Outline CTMP [APP-287]** and **Outline Public Rights of Way and Permissive Paths Management Plan [APP-282]** have been prepared to manage construction vehicle movement during the construction phase and operation and maintenance phase. An **OCTMP [APP-287]** supports the DCO Application and includes outline measures to minimise transport and access impacts as far as practicable. With these measures in place, there would be no significant adverse effects to driver delay from HGV movements. Furthermore, closures are anticipated to be required only for construction works within the Cable Route Corridor and would be prioritised for nighttime work, and kept as short in duration as possible. The works are secured within the works plans and DCO wording, however, road space booking with the highway authority will still be required. As such, the Applicant does not

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				anticipate that traffic delay will have a substantial effect on access to Foxley Road Nurseries. A final CTMP would be prepared post consent and must be substantially in accordance with the **OCTMP [APP-287]** and approved by the relevant local planning authorities (in consultation with the relevant highway authorities), as secured by Requirement 15 in Schedule 2 of the **Draft DCO [APP-016]**.
FRN-003	Socio-Economics, Tourism and Recreation	Tourism	Caravan Site Caravanners stay with us to enjoy the local countryside, they will not want to visit an industrial landscape and access will be difficult due to increased traffic, particularly of HGVs.	The Applicant has assessed the likely impacts to the tourism-based economy in **ES Volume 1 Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]**, based on a worst-case scenario determined by likely significant effects from the Scheme at each phase of the Scheme. The most substantial considerations within this are visual and amenity impacts to tourism destinations and PROWs that may dissuade visitors from accessing the areas affected by the Scheme. Impacts from construction traffic have also been considered in specific locations where interactions with construction HGVs are most likely to occur, and have been assessed in relation to specific tourism receptors in **ES Volume 3, Appendix 16-2 Tourism and Recreation Receptor Tables [APP-241]**. The assessment finds effects on tourism locations from HGVs on the highway network are not anticipated to be significant. This has been based on the assessment of impacts to driver delay and driver safety as assessed in **ES Volume 1 Chapter 13: Transport and Access [APP-065]**, and therefore it is not considered likely that there would be any significant effect to the ability for visitors to access the affected areas by road.
FRN-004	Socio-Economics, Tourism and Recreation	Employment	Employment For many of our staff working in a peaceful rural environment is a major reason for choosing to work for us. This will no longer be the case and will make recruitment difficult.	The assessment of employment effects as a result of the Scheme in **ES Volume 1 Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** has focused on direct impacts to employment and economic performance. Employment preference by individuals has not been assessed due to its subjectivity and as it would be disproportionate to the scope of assessment required for DCO consent. That

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				notwithstanding, the Applicant has assessed the landscape and visual impact of the Scheme in **ES Volume 1 Chapter 8: Landscape and Visual Impact [APP-060]** and has determined the likely social and community wellbeing impacts from the Scheme on the basis of those effects in **ES Volume 1 Chapter 18: Human Health [APP-070]**. The assessment in the latter finds there are no significant adverse effects to community identity and culture as a result of the Scheme. Using this metric, it is unlikely that the Scheme will significantly change the amount to which people wish to work in this area.
FRN-005	Soils and Agriculture	Food Production	Food Production A large part of our business is producing fruit and vegetable plants for local customers to grow their own, which I encourage wholeheartedly .I strongly disagree with the ethos of covering huge areas of good farmland in solar panels which will further increase our reliance on imported food.	The effects of the Scheme on agricultural land, including land quality and productivity, are assessed in **ES Volume 1, Chapter 17: Soils and Agriculture [APP069]**, supported by **ES Volume 3, Appendix 171: Agricultural Land Classification and Soil Resource Survey Report [APP243]**. That assessment identifies that the majority of agricultural land affected is not Best and Most Versatile (BMV) land, comprising predominantly Subgrade 3b and Grade 4 land, which is not considered highquality agricultural land in planning terms. Governmentled agricultural initiatives, such as the Sustainable Farming Incentive which is relaunching later in 2026, have prioritised soil health, environmental enhancement and climate resilience, recognising that longterm food security is influenced by a range of factors beyond land take alone, including soil condition, climate change and environmental pressures. The Scheme allows soils to remain in situ and undisturbed during operation, supporting soil recovery and longterm land health, with land reinstated and returned to agricultural use as far as practicable following decommissioning. No permanent loss of agricultural land is anticipated. The Applicant does not consider that food security will be compromised by the Scheme (or solar energy more widely). The latest figures to September 2024 indicate that solar occupied around 21,200 ha of agricultural land in the UK. In

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				2025, 545,000 ha of arable land in England were left uncropped (source: Department for Environment, Food & Rural Affairs, Agricultural land use in England at 1 June 2025). It should also be noted that food security is not identified as an issue within the suite of Energy National Policy Statements or the National Planning Policy Framework (NPPF). Further, the Government's UK Solar Roadmap (2025) states that solar development is not considered to compromise food security, but that the climate and nature crisis poses the greatest long-term risk to food security - a risk which the Scheme directly helps to address by providing a secure, low-carbon source of electricity. As set out in Section 2 of the **Outline Decommissioning Strategy [APP-279],** post-decommissioning of the Scheme, the landowners would choose how the land is to be used and managed. The landowner may return all of the land to arable use, although it is likely that established habitats such as hedgerows and woodland would be retained given their potential benefits to agricultural land and the wider farming estate.
FRN-006	Description and DCO Process	Conclusion	Having spoken to many of our customers since the announcement of this scheme, there is huge concern about many aspects of this scheme – the huge size of the panels, the destruction of the countryside, damage to wildlife, proximity to local heritage sites, the BESS, the noise, light and chemical pollution from runoff, and industrialisation of good farmland. Solar panels should primarily be installed on factory and warehouse roofs. This application must be turned down.	Panel Size The height of the solar PV panels has been assessed using clearly defined design parameters, including a maximum height of 4.5 metres above ground level at maximum tilt, as set out in **ES Volume 1, Chapter 3: The Scheme [APP-055]** and secured in the **Design Principles and Parameters [APP-269]**. These parameters represent a realistic worst-case scenario for the purposes of the Environmental Impact Assessment. The landscape and visual effects of the Scheme, including the effects of the maximum panel height, are assessed in the Landscape and Visual Impact Assessment (LVIA) presented in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**. The LVIA assesses effects on identified landscape and visual

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				receptors during construction, operation and decommissioning, using the maximum design parameters to ensure a robust assessment. The LVIA recognises that there would be temporary Moderate Adverse effects on Landscape Character within the 1 km as a result of the change in land use from arable farmland to solar infrastructure. However, the Scheme proposes significant mitigation measures informed by Wiltshire's Nature Recovery Strategy to reduce the effects of the Scheme on landscape character which will provide significant beneficial effects to the fabric of the Sites and the legacy Landscape. The visual effects of the Scheme are summarised in ES Volume 3, Appendix 8-3-3 **[APP-192].** Temporary Major/Moderate and Moderate Adverse effects on visual receptors have been recorded across the Scheme during construction and at Year 1. However, for the majority of these receptors, the effects reduce to non –significant levels as a result of the embedded mitigation measures which are set out in Section 8.9 of **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]** and include landscape buffers, retention of existing hedgerows and woodland, and new planting to provide screening and integration over time. The assessment also identifies that there would be some long term significant effects on the visual amenity of users of some localised footpaths, as a result of the Scheme. This predominantly relates to locations where footpaths diagonally cross fields and mitigation planting would be inappropriate to landscape character and the legacy landscape. Those receptors which would experience significant long term visual effects are listed in Table 8-30 of the LVIA **[APP-060]**. Mitigation measures to address landscape and visual effects, including measures that reduce the perceived height and prominence of panels in views, are set out in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**, Figure 3-4-1 to 3-4-5.**2 Landscape and Ecology Mitigation Plan [APP-084]**

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				and detailed within the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]**. These include new and enhanced planting, retention of existing hedgerows and woodland, and landscape integration measures to reduce visual effects over time. The preparation, approval and implementation of the detailed Landscape and Ecological Management Plan, substantially in accordance with the **OLEMP [APP-283]**, are secured through Requirement 7 in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that the identified mitigation measures are delivered and maintained throughout the lifetime of the Scheme. <u>Wildlife</u> Potential impacts on ecology and biodiversity are fully assessed in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**. This assessment considers baseline ecological conditions and evaluates likely significant effects arising during the construction, operation and decommissioning phases of the Scheme. It identifies avoidance, mitigation and enhancement measures to address potential impacts on habitats and protected and notable species. It also identifies opportunities for ecological enhancement, including the creation and long-term management of habitats, and delivery of biodiversity net gain. The assessment concludes that, with embedded and additional mitigation measures in place, no unacceptable significant adverse effects on ecology and biodiversity are anticipated. The Applicant notes that the approach to the assessment in relation to ecology and biodiversity in general is under discussion with Wiltshire Council and Natural England and is set out in the relevant Statements of Common Ground to be submitted at Deadline 1. During construction, specific measures are proposed to avoid disturbance and displacement of wildlife. These include

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				protective buffers around sensitive habitats and features, timing restrictions on vegetation clearance, pre-construction ecological surveys, species-specific mitigation, and pollution prevention controls which are set out in the **Outline Ecological Protection and Mitigation Strategy (EPMS) [APP-284]**. Measures to protect trees and hedgerows are also set out in **ES Volume 1, Chapter 10: Arboriculture [APP-062]**. The Scheme will also result in the cessation of intensive arable farming within the Solar PV Sites. As identified in **ES Volume 1, Chapter 9 [APP-061]**, this is expected to reduce the ongoing application of herbicides and pesticides, supporting improvements in habitat quality over the operational lifetime of the Scheme. The reversion of existing arable land within the Solar PV Sites to predominantly grassland habitats can be expected to benefit a wide range protected and notable species, as identified in **ES Volume 1, Chapter 9 [APP-061]**. Mitigation and enhancement measures are detailed in the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]** and the **Outline Ecological Protection and Mitigation Strategy (OEPMS) [APP-284]**, which set out habitat creation, species protection measures, buffer zones and long-term ecological management. The preparation, approval and implementation of the detailed Landscape and Ecological Management Plan, substantially in accordance with the **OLEMP [APP-283]**, are secured through Requirement 7 in Schedule 2 of the **Draft Development Consent Order [APP-016]**. The preparation, approval and implementation of the detailed Ecological Protection and Mitigation Strategy, substantially in accordance with the **OEPMS [APP-284]**, are secured through Requirement 8 in Schedule 2 of the **Draft Development Consent Order [APP-016]**. These requirements ensure that ecological protection and enhancement measures are delivered and maintained throughout construction and operation of the Scheme.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				Cultural Heritage The potential effects of the Scheme on cultural heritage, including archaeological assets dated to the Roman and medieval periods, are fully assessed in **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, supported by detailed technical appendices in **ES Volume 3, Appendices 12-1 to 12-7 [APP-219 to APP-231]**. The chapter considers baseline conditions, identifies built and archaeological heritage assets within the study area, and assesses likely effects during construction, operation and decommissioning, including effects on setting. The chapter concluded that, following mitigation, the residual effects on any archaeological assets including Roman and medieval period remains, would be neutral/negligible and therefore not significant (see **Volume 3, Appendix 12-8 Cultural Heritage Impact Assessment Tables [APP-232]**). The assessment is underpinned by extensive desk-based research, geophysical survey and evaluation trenching, as detailed in **ES Volume 3, Appendix 12-2: Archaeological Desk-Based Assessments [APP-220]**, **Appendix 12-4: Archaeological Geophysical Survey Reports [APP-224]**, and **Appendix 12-5: Interim Evaluation Trial Trenching Reports [APP-225]**. The Applicant notes that the approach to the assessment has been agreed with Wiltshire Council and the methodology for the mitigation strategy is under discussion with Wiltshire Council and is set out in the relevant Statement of Common Ground to be submitted at Deadline 1. Embedded mitigation measures to avoid or reduce harm to heritage assets are set out in Section 12.9 of **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, with additional mitigation measures detailed in Section 12.11. An overarching archaeological mitigation strategy is provided in **ES Volume 3, Appendix 12-6: Outline Archaeological Mitigation Strategy**

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				[APP-230], which sets out the framework for further archaeological investigation, recording and protection where ground disturbance cannot be avoided. The preparation, approval and implementation of detailed archaeological Written Schemes of Investigation, substantially in accordance with the Outline Archaeological Mitigation Strategy, are secured through Requirement 12 of Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that appropriate protection, recording and mitigation are delivered before and during construction. <u>BESS</u> As set out in Section 4.7 of **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]**, the location of the BESS was determined through an options appraisal and iterative design process, having regard to technical requirements, environmental constraints and potential effects on nearby receptors. The BESS Area is located at Lime Down D, close to the Solar PV Sites and the on-site substation, which provides operational and efficiency benefits, including minimising transmission losses, maximising storage efficiency, supporting grid balancing, and enabling a rapid and reliable response to network fluctuations. Among the options considered for co-locating the BESS with the Solar PV Sites, Lime Down D was identified as the preferred location due to its central position within the Scheme, the presence of existing and proposed screening, its limited proximity to many residential properties, and its relationship with existing infrastructure, including the adjacent railway line. The various chapters of the **ES [APP-052 to APP-265]** assess the likely significant effects arising from the BESS at this location and identify mitigation measures where necessary. Overall, the assessment concludes that the siting of the BESS

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				at Lime Down D presents the lowest potential for significant adverse effects when compared with reasonable alternatives. Further detail on the consideration of alternatives, the design evolution of the Scheme and the assessment of potential effects is provided in **ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP-056]**, which sets out the iterative process undertaken to identify the preferred location and layout for the Scheme, including the BESS Area in Section 4.7. <u>Noise</u> An assessment of the effects of the Scheme on noise and vibration is provided in **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**, with supporting technical information supplied in **ES Volume 3, Appendix 14-4: Noise Modelling [APP-237]**. The assessment considers potential noise and vibration impacts during construction, operation and decommissioning, including from solar PV panels and associated infrastructure, and concludes that significant effects can be avoided. The Applicant notes that the approach to noise and vibration has been discussed with Wiltshire Council, as described in Section 14.2 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**. Construction phase The noise and vibration impacts arising from construction activities are assessed in Section 14.10 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**. For the purposes of the assessment, a reasonable worst-case scenario assuming piling activities has been considered. Mitigation measures associated with construction activity are presented in Section 14.9 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]** and are committed to through the **Outline Construction Environmental Management Plan [APP-277]**. With these

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				measures in place, the assessment concludes that no significant effects from construction noise or vibration are expected. A noise monitoring programme agreed with Wiltshire Council will be carried out during construction. This is also committed to in the **Outline Construction Environmental Management Plan [APP-277]**. The preparation, approval and implementation of the Construction Environmental Management Plan, substantially in accordance with the **Outline CEMP [APP-277]**, is secured through Requirement 13 in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that construction noise and vibration are appropriately controlled. Operational phase The noise impacts from the operation of the Scheme and its components are assessed in Section 14.10 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**, with supporting modelling provided in **ES Volume 3, Appendix 14-4: Noise Modelling [APP-237]**. A penalty has been applied to predicted noise levels from the Solar PV Sites to account for the distinctive nature of the sound. Potential mitigation measures are detailed in Section 14.9 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**, and with such measures in place, significant effects from operational noise are not expected. The **Outline Operational Environmental Management Plan [APP-278]** commits to noise levels from the Scheme at residential dwellings being the same as or below those modelled in the ES. This provides assurance that significant effects from operational noise will be avoided, while allowing flexibility in how this is achieved. The preparation, approval and implementation of the detailed OEMP, substantially in accordance with the outline plan, are

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				secured through Requirement 14 of Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring operational noise is appropriately controlled throughout the lifetime of the Scheme. Light pollution Potential effects relating to lighting are considered within the LVIA in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**, which considers the implications of construction, operational and decommissioning lighting on landscape and visual receptors. No significant effects of lighting, above those recorded for landscape and visual receptors, were recorded. The Landscape and Visual Impact Assessment (LVIA) has considered the construction, operational and decommissioning lighting proposals for the Scheme, with details of lighting design, directionality and intermittent lighting set out in **ES Volume 1, Chapter 3: The Scheme [APP-055]**. The Scheme has been designed to minimise the need for external lighting. Lighting is not required within the Solar PV Arrays during the operational phase. Motion-sensing security lighting will be provided within substations and the BESS Area and will be used only for maintenance and security purposes. Temporary site lighting during construction and decommissioning will be required to enable safe working during hours of darkness. This lighting will be designed, as far as reasonably practicable, to minimise light spill outside the Site and Cable Route Corridor, particularly towards residential properties, highways and ecological receptors. Standard good practice measures will be employed to minimise glare and light spill during construction, operation and decommissioning. There will be no lighting on perimeter fencing. The mitigation measures to control construction lighting stated above are secur

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				ed within the **Outline Construction Environmental Management Plan [APP-277]**, and operational lighting controls (also referenced above) form part of the **Outline Operational Environmental Management Plan [APP-278]**. The preparation, approval and implementation of detailed management plans, substantially in accordance with these outline plans, are secured through requirements in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring lighting impacts are appropriately controlled throughout the lifetime of the Scheme. <u>Contamination</u> An assessment of potential contamination risks is provided in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [APP-063]** and **ES Volume 1, Chapter 19: Ground Conditions [APP-071]**, which consider risks to surface water, groundwater and sensitive receptors during construction, operation and decommissioning of the Scheme. These assessments conclude that, with appropriate mitigation and management measures in place, no significant contamination effects are anticipated. The Scheme incorporates sealed and isolatable drainage principles for the BESS and substations to ensure that operational spillages or firewater can be contained and managed without discharge to the surrounding environment. In the event of an incident, drainage isolation measures allow potentially contaminated water to be retained on site and tested prior to any controlled release or removal by a licensed waste contractor. These principles are consistent with the approach described in the **Outline Battery Safety Management Plan [APP-286]** and will be further developed through the detailed drainage design secured through the DCO discharge process. The Applicant notes that the approach to pollution resulting from battery fire is under discussion with both the Environment Agency and the Lead Local Flood Authority (LLFA) and is set

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				out in the relevant Statement of Common Ground to be submitted at Deadline 1. Mitigation measures to control contamination risk during construction are set out in the **Outline Construction Environmental Management Plan [APP-277]**. Routine maintenance and panel cleaning will use minimal water and no detergents or chemical cleaning agents, in line with industry standards and best practice, so there is no expected risk from cleaning runoff. In addition, the removal of agrichemical inputs through the cessation of farming activities will further reduce contamination risks compared to existing use. The preparation, approval and implementation of a Construction Environmental Management Plan substantially in accordance with the **Outline Construction Environmental Management Plan [APP-277]** is secured through Requirement 13 in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that construction works are carried out in accordance with the approved CEMP and that contamination risks are appropriately managed throughout construction of the Scheme. <u>Farmland</u> An assessment of the potential effects of the Scheme on soils and agricultural land is provided in **ES Volume 1, Chapter 17 Soils and Agriculture [APP-069]**. This chapter considers baseline agricultural land quality, including Best and Most Versatile (BMV) land, and assesses likely significant effects arising from construction, operation and decommissioning of the Scheme, together with embedded mitigation measures. The areas of each Agricultural Land Classification (ALC) grade affected by the Scheme are set out **in ES Volume 1, Chapter 17, Section 17.7 [APP-069]**. Of the agricultural land within the Solar PV Sites, approximately 477.4 hectares (around 67%) is classified as Subgrade 3b or Grade 4 and is therefore not BMV

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				land. There is no Grade 1 land, around 30.8 hectares (approximately 4%) of Grade 2 land, and approximately 209.3 hectares (around 29%) of Subgrade 3a land. The distribution of ALC grades is shown in **ES Volume 2, Figure 17-2: Agricultural Land Classification Mapping [APP-172]**. The Applicant has had regard to agricultural land quality in the design and site selection process and has sought, where practicable, to locate infrastructure on lower quality land. The Scheme will result in a temporary but long-term and reversible loss of agricultural land for the operational life of the Scheme. As set out in **ES Volume 1, Chapter 17, Section 17.10 [APP-069]**, this gives rise to a temporary, long-term moderate adverse effect on agricultural land overall, and a temporary, long-term major/moderate adverse effect on BMV land, both of which are assessed as significant. These effects are fully reported in the ES and are a matter for the Secretary of State to weigh in the planning balance against the need for the Scheme and its wider benefits. There are no significant permanent effects on agricultural land, as all land will be returned to its original use and condition as far as practicable following decommissioning. The Applicant notes that the approach to assessing the quality of the agricultural land is under further discussion with Natural England and is set out in the relevant Statement of Common Ground to be submitted at Deadline 1. Measures to avoid and minimise effects on soils and agricultural land are embedded within the Scheme design and secured through Schedule 2, Requirement 17 of the **Draft DCO [APP-016]** which includes the preparation and implementation of a Soil Resources Management Plan (SRMP) in accordance with the **Outline SRMP [APP-280].** The SRMP will control soil handling, storage and reinstatement during construction, operation and decommissioning, and a requirement to prepare and implement a Decommissioning Strategy in accordance with the **Outline**

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				Decommissioning Strategy [APP-279], which is secured by Schedule 2, Requirement 20 of the **Draft DCO [APP-016]**. The **Outline Landscape and Ecological Management Plan [APP-283]** details how grassland and other habitat will be established beneath and between the solar panels. The detailed LEMP will be secured through Schedule 2, Requirement 7 of the **Draft DCO [APP-016]**. Through the establishment and maintenance of long-term grassland beneath and between the solar arrays, soil health, quality and structure are anticipated to improve over the lifetime of the Scheme, resulting in a temporary, moderate beneficial effect on soil resources at decommissioning, which is assessed as significant (**ES Volume 1, Chapter 17, Sections 17.10 and 17.12 [APP-069]**). <u>Solar panels on factory and warehouse roofs.</u> In relation to suggestions that brownfield land or alternative locations should be used, including rooftop, these matters are addressed in **ES Volume 1, Chapter 4: Alternatives and Design Evolution and in the Statement of Need [APP-056 and APP-266]**. The Applicant has considered alternatives, including previously developed land and other forms of solar deployment, as part of the site selection and design evolution process. Furthermore, the Table 2-2 of the Site Selection Assessment Report at Appendix 4-1 of the Environmental Statement **[APP-185]** considers sites over 1 hectare within the area of search that were identified from the brownfield land registers of the relevant Local Planning Authorities. As demonstrated, there are no sites available that are large enough to provide a viable land parcel of at least 40 ha and the sites were not considered to be available as they have planning permission for residential development and/or are allocated for residential/mixed use development. In terms of solar panels on commercial rooftops, paragraph 2.4.8 of the Site Selection Assessment Report at Appendix 4-1 of the Environmental Statement **[APP-185]** sets out that consideration was given to

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				commercial rooftops within the 20 km search area, however, initial considerations showed that it was unlikely that there would be rooftops or combined premises of an adequate area to facilitate a large-scale solar project or provide a viable network of sites in close proximity. National policy and government guidance, as set out in the **Statement of Need [APP-266]**, recognise that while rooftop and smaller-scale solar installations are an important part of the energy mix, they cannot alone meet the scale of capacity required to achieve clean power and net zero objectives. Large-scale ground-mounted solar therefore remains necessary in addition to, not instead of, rooftop solar.
FRN-006	Transport and Access	Traffic Impact	I am strongly against the proposal for Lime Down Solar Park for the following reasons: FOXLEY ROAD NURSERIES Our business is a family run plant nursery which has operated just outside Foxley village since 1948. We depend on our local loyal customers to visit our rural location, mainly by private car. We know from previous experience that any traffic delays and diversions have a negative impact on the number of customer visits.	The Applicant has undertaken an assessment of potential transport and access impacts of the Scheme in **ES Volume 1, Chapter 13: Transport and Access [APP-065]**. This included the capacity of local roads and infrastructure to accommodate construction vehicles with consideration of construction traffic volumes, vehicle types, route suitability, and network performance. The assessment concludes that with appropriate mitigation in place, there would be no significant adverse impacts on the local highway network during the construction, operation and maintenance, and decommissioning phases of the Scheme. An **OCTMP [APP-277]** supports the DCO Application and includes outline measures to minimise transport and access impacts as far as practicable. With these measures in place, there would be no significant adverse effects to driver delay from HGV movements. Furthermore, closures are anticipated to be required only for construction works within the Cable Route Corridor and would be prioritised for nighttime work, and kept as short in duration as possible. These measures are secured in the OCTMP. As such, the Applicant does not anticipate that traffic delay will have a substantial effect on access to Foxley Road Nurseries.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				A final CTMP would be prepared post consent and must be substantially in accordance with the **OCTMP [APP-287]** and approved by the relevant local planning authorities (in consultation with the relevant highway authorities), as secured by Requirement 15 in Schedule 2 of the **Draft DCO [APP-016]**.
FRN-007	Transport and Access	Traffic Impact	CONSTRUCTION TRAFFIC The impact of the construction phase would cause major roadworks and traffic problems on the narrow (some single track) lanes around our business.	**ES Volume 1, Chapter 13: Transport and Access [APP-065]** provides an assessment of the construction impact on highway network and its users and concludes that there are no significant impacts as a result of the Scheme. The proposed construction routes have been carefully assessed and are considered to be the most appropriate routes to the Scheme. Construction traffic will also be temporary and controlled through measures in a CTMP. An **OCTMP [APP-287]** supports the DCO Application and includes outline measures to minimise transport and access impacts as far as practicable. This includes road condition surveys to ensure any damage to the highway network caused by construction traffic is identified and rectified, management of construction deliveries to avoid the requirement for HGVs generated by the Scheme passing each other in opposite directions on the local roads, and restricted hours of deliveries outside of peak hours. With this mitigation in place, **ES Volume 1, Chapter 13: Transport and Access [APP-065]** concludes that transport impacts on road driver and passenger delay, severance, highway and NMU users safety would be negligible to minor adverse. A final CTMP would be prepared post consent and must be substantially in accordance with the **OCTMP [APP-287]** and approved by the relevant local planning authorities (in consultation with the relevant highway authorities), as secured by Requirement 15 in Schedule 2 of the **Draft DCO [APP-016]**.
FRN-008	Transport and Access	Traffic and Flooding	When there is flooding or an accident at Kingway Bridge on the A429, Foxley	The assessment recognises that parts of the local road network, including routes used as alternatives during flooding or

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
	Hydrology, Flood Risk and Drainage		Road is part of the alternative route. The vast number of lorry movements required to construct the solar complex coming through Hullavington, Norton, Foxley, Sherston and beyond, would have a major impact on traffic and become a real deterrent to our customers and are therefore likely to affect negatively our trade.	incidents, can be affected by baseline flooding conditions. The hydrology, flood risk and drainage assessment concludes that the Scheme would not increase flood risk to surrounding land or infrastructure, including roads such as Foxley Road, as set out in **ES Volume 1, Chapter 11 Hydrology, Flood Risk and Drainage [APP-063].** Where access routes are affected by baseline flooding or incidents, construction activities would be required to be planned and managed around those conditions. Construction phase arrangements, including timing, routing and management of vehicle movements, are secured through the construction environmental management framework in **Outline Construction Environmental Management Plan [APP-277]**, which includes measures to avoid exacerbating surface water flooding and to adapt construction logistics where access constraints arise. On this basis, while existing flooding at locations such as Kingway Bridge may occur, the Scheme would not worsen flood risk and construction activities would be managed within the agreed controls. The potential effects of construction traffic on the local highway network are assessed in **ES Volume 1, Chapter 13: Transport and Access [APP-065]**, which considers construction vehicle movements, traffic volumes, road safety and effects on road users. This included the capacity of local roads and infrastructure to accommodate construction vehicles with consideration of construction traffic volumes, vehicle types, route suitability, and network performance. The assessment concludes that the level of construction traffic associated with the Scheme is unlikely to materially affect road safety on links within the Study Area, and no significant adverse effects on accident risk are anticipated. The assessment also concludes that with appropriate mitigation in place such as the CTMP, there would be no significant adverse impacts on the local highway network during the

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				construction, operation and maintenance, and decommissioning phases of the Scheme. Construction vehicle movements will be managed through a Construction Traffic Management Plan. An **Outline Construction Traffic Management Plan (CTMP) [APP-287]** has been prepared and submitted with the DCO application. The aim of the CTMP is to ensure that the effect of the construction phase on the local highway network is minimised. The **Outline CTMP [APP-287]** sets out measures to coordinate construction deliveries by HGVs to arrive and depart between 09:30 and 16:30 where possible, to avoid peak network hours of 08:00–09:00 and 17:00–18:00. It also includes a community liaison element to keep local communities informed about the construction process and to provide a contact for feedback should any issues arise. Compliance with the CTMP will be monitored by the Developer, Contractor and Wiltshire Council as local highway authority. The preparation, approval and implementation of the final CTMP, substantially in accordance with the outline CTMP, are secured through Requirement 15 of Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring construction traffic impacts are appropriately managed throughout the construction phase of the Scheme.
FRN-009	Socio-Economics, Tourism and Recreation	Tenant Farmers	FARMING As a horticultural business, we are closely allied with the local farming community and take a keen interest in their seasonal activities. The land earmarked for Lime Down is currently productive agricultural land, mostly farmed by tenant farmers whose families have farmed locally for many generations; many of the local farmers are also our customers and	The Applicant confirms that land agreements have been made with landowners who have their own contractual arrangements with tenant farmers. Whilst a worst case could therefore involve the termination of an agricultural tenancy or contract in its current form, alternative operational and management opportunities are available connected to the scheme should consent be granted. These opportunities are to be offered to existing tenants and contractors as a primary alternative. Additionally, where available, and at the discretion of the landowner, alternative land would be sought for tenants to continue their agricultural practices.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			they will be directly affected by the reduction in their available land area.	The Applicant is cognisant of the impact the Scheme could have on wider agricultural employment associated with tenancies and contracts and so seeks to source ways of retaining agricultural workers, providing reskilling opportunities, or providing re-employment as supported by the measures secured in the **Outline Skills, Supply Chain and Employment Plan [APP-285]** by Requirement 18 of Schedule 2 to the **Draft DCO [APP-016]**.
FRN-010	Soils and Agriculture	Food Security	The use of productive land for solar panels is ignoring the need for the UK to protect its food security, especially with the ongoing effects of climate change and global insecurity.	The Applicant does not consider that food security will be compromised by the Scheme (or solar energy more widely). The latest figures to September 2024 indicate that solar occupied around 21,200 ha of agricultural land in the UK. In 2025, 545,000 ha of arable land in England were left uncropped (source: Department for Environment, Food & Rural Affairs, Agricultural land use in England at 1 June 2025).It should also be noted that food security is not identified as an issue within the suite of Energy National Policy Statements or the National Planning Policy Framework (NPPF). Further, the Government's UK Solar Roadmap (2024) states that solar development is not considered to compromise food security, and that climate change itself poses the greatest long-term risk to food production - a risk which the Scheme directly helps to address by providing a secure, low-carbon source of electricity. The **Statement of Need [APP-266]** describes that there is an urgent and unprecedented need for new low carbon generation in the UK to meet our climate change, energy security and affordability targets. Further, the Government considers that a secure, reliable, affordable, net zero consistent system in 2050 is likely to be composed predominantly of wind and solar (NPS EN-1, Para 3.3.20).

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
FRN-011	Cultural Heritage	Heritage Assets	HERITAGE The proximity to the Cotswolds AONB, the Fosse Way and many small picturesque local villages will adversely affect our local heritage and way of life.	The Cotswolds National Landscape (CNL) is fully assessed as a standalone receptor within **ES Volume 3, Appendix 8.6: Assessment of Effects on the Special Qualities of the Cotswolds National Landscape [APP-197]**. This assessment considers the effects of the Scheme on landscape character, visual amenity and the special qualities of the CNL, including tranquillity. The assessment found that there would be some short term impact to landscape character within the setting of the CNL but due to the avoidance measures embedded within the Scheme, harm to the CNL itself would be minimal with beneficial effects in the long term which would further the purposes of the designation. In respect of visual amenity, some short-term adverse effects would be experienced by a small number of visual receptors with views to and from the CNL. However, these would reduce over time as a result of the proposed mitigation. The assessment of effects on the special qualities of the CNL scoped out 3 SQs as there is no association with the Site. The assessment found that there are no direct effects on the remaining SQs. There are some Minor/ Negligible short-term effects on a small number of visual receptors within the setting of the CNL which effect SQ7 - Tranquillity and SQ13 Archaeology and historic associations. However, these effects are mitigated by Year 15 when proposed vegetation has matured. The assessment also found that there would be beneficial effects on SQ 6 – Biodiversity and nature recovery as a result of the delivery of approximately 119.7 hectares of flower-rich neutral grassland (as defined in the BNG assessment) and SQ 12 - An accessible landscape as a result of the delivery of approximately 12.8km of new permissive paths within the setting of the CNL. The remaining SQs would remain entirely intact. The Scheme was refined through an iterative design process to avoid and reduce effects on the CNL and its setting. Panels along the edge of the CNL were removed from the

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				Order Limits in fields C2, C3 and C4 where significant visual effects on receptors within the CNL were identified. Panels were also removed from fields C1, C6, C8, the western section of C9 and the majority of C10, with this land now proposed for ecological mitigation to protect the setting of the CNL. In addition, panels within fields A11 and A12 were removed and the land repurposed for ecological mitigation to protect the setting of the CNL towards Sherston. All land parcels adjacent to the CNL are proposed to deliver habitat enhancement, informed by the CNL Management Plan and the Cotswolds National Landscape Strategy and Guidelines, to further the purposes of the designation. Details of the proposed landscape and ecological mitigation and enhancement measures such as the avoidance measures to remove panels from the boundary of CNL are provided in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060], Figure 3-4-1 to 3-4-5.2 Landscape and Ecology Mitigation Plan [APP-084]** and secured within the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283],** and the **Outline Ecological Protection and Mitigation Strategy (EPMS) [APP-284]**. The preparation, approval and implementation of the detailed Landscape and Ecological Management Plan, substantially in accordance with the **OLEMP [APP-283]**, are secured through Requirement 7 in Schedule 2 of the **Draft Development Consent Order [APP-016].** The preparation, approval and implementation of the detailed Ecological Protection and Mitigation Strategy, substantially in accordance with the **EPMS [APP-284]**, are secured through Requirement 8 in Schedule 2 of the **Draft Development Consent Order [APP-016]**. These requirements ensure that the identified mitigation and enhancement measures are delivered and maintained throughout the lifetime of the Scheme. Fosse Wa

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				The potential effects of the Scheme on the Roman Roads (i.e. the Fosse Way), as well as other Roman archaeological assets are fully assessed in **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, supported by detailed technical appendices in **ES Volume 3, Appendices 12-1 to 12-7 [APP-219 to APP-231]**. Where an adverse effect has been identified to Roman archaeological assets, appropriate mitigation such as preservation in situ or Strip, Map and Record is proposed. See Section 12.9 of **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]** for embedded mitigation and Section 12.11 for additional mitigation. The chapter concluded that following mitigation, residual effects would be either neutral/negligible or minor/moderate and therefore not significant. An overarching archaeological mitigation strategy is provided in **ES Volume 3, Appendix 12.6 Archaeological Mitigation Strategy [APP-230]** and secured through Requirement 12 of the DCO. The Applicant visited land to the east of the Badminton Estate on 28th March 2025 with Historic England. It was agreed that the landscape character was distinctly different in the Scheme to the Cotswolds National Landscape, in which the Badminton Estate lies. No impact has been identified on the Cotswolds National Landscape or the designated heritage assets within it, and this conclusion was agreed with Historic England. The effects on the Cotswolds National Landscape and its Special Qualities are set out in a standalone assessment in **ES Volume 3, Appendix 8-6 [APP-197].**
FRN-012	Landscape and Visual	Tourism	Part of our business is a Certified Location for the Caravan & Motorhome Club – their members come to us to enjoy the peace and tranquillity of the countryside, not an industrial solar complex.	The potential effects of the Scheme on tourism and recreation are assessed in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]**, supported by **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]**. The assessment considers baseline tourism activity, visitor attractions, recreational assets and tourism-dependent businesses within the study area. The assessment has not

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				however directly assessed camping or caravanning locations. The assessment evaluates potential effects on the use, enjoyment and desirability of nearby tourism destinations, including impacts on individual visitor attractions, recreational routes, events and businesses reliant on tourism. It also considers whether changes to landscape character or visual amenity could influence visitor behaviour. The assessment identifies a worst-case scenario in which a temporary loss of up to 50 tourism-related jobs could occur locally during construction, and a long-term loss of up to 11 tourism-related jobs could occur during the operational phase of the Scheme. This represents a precautionary estimate based on conservative assumptions. The assessment concludes that, while some localised effects on tourism receptors are anticipated to occur, significant adverse effects on the wider tourism economy are not anticipated. These findings are fully reported in the ES and will be weighed in the planning balance alongside the Scheme's wider economic and environmental benefits. The Applicant is discussing the approach to assessment of tourism impacts with Wiltshire Council's Economic and Regeneration Team and those discussions will be set out in the Statement of Common Ground with Wiltshire Council to be submitted at Deadline 1.
FRN-013	Ecology and Biodiversity	Impact on Habitats	WILDLIFE Biodiversity would be adversely affected by the construction phase – removal of existing hedges and trees which provide important wildlife habitats and the ongoing industrialisation of the area would decimate the wildlife.	Potential impacts on ecology and biodiversity are fully assessed in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**. This assessment considers baseline ecological conditions and evaluates likely significant effects arising during the construction, operation and decommissioning phases of the Scheme. It identifies avoidance, mitigation and enhancement measures to address potential impacts on habitats and protected and notable species. It also identifies opportunities for

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				ecological enhancement, including the creation and long-term management of habitats, and delivery of biodiversity net gain. The assessment concludes that, with embedded and additional mitigation measures in place, no unacceptable significant adverse effects on ecology and biodiversity are anticipated. The Applicant notes that the approach to the assessment in relation to ecology and biodiversity in general is under discussion with Wiltshire Council and Natural England and is set out in the relevant Statements of Common Ground to be submitted at Deadline 1. During construction, specific measures are proposed to avoid disturbance and displacement of wildlife. These include protective buffers around sensitive habitats and features, timing restrictions on vegetation clearance, pre-construction ecological surveys, species-specific mitigation, and pollution prevention controls which are set out in the **Outline Ecological Protection and Mitigation Strategy (EPMS) [APP-284].** Measures to protect trees and hedgerows are also set out in **ES Volume 1, Chapter 10: Arboriculture [APP-062]**. The Scheme will also result in the cessation of intensive arable farming within the Solar PV Sites. As identified in **ES Volume 1, Chapter 9 [APP-061]**, this is expected to reduce the ongoing application of herbicides and pesticides, supporting improvements in habitat quality over the operational lifetime of the Scheme. The reversion of existing arable land within the Solar PV Sites to predominantly grassland habitats can be expected to benefit a wide range protected and notable species, as identified in **ES Volume 1, Chapter 9 [APP-061]**. Mitigation and enhancement measures are detailed in the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]** and the **Outline Ecological Protection and Mitigation Strategy (OEPMS) [APP-284]**, which set out habitat creation, species protection measures, buffer zones and long-term ecological management.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				The preparation, approval and implementation of the detailed Landscape and Ecological Management Plan, substantially in accordance with the **OLEMP [APP-283]**, are secured through Requirement 7 in Schedule 2 of the **Draft Development Consent Order [APP-016]**. The preparation, approval and implementation of the detailed Ecological Protection and Mitigation Strategy, substantially in accordance with the O**EPMS [APP-284]**, are secured through Requirement 8 in Schedule 2 of the **Draft Development Consent Order [APP-016]**. These requirements ensure that ecological protection and enhancement measures are delivered and maintained throughout construction and operation of the Scheme. The Scheme has been designed through an iterative design process to retain existing hedgerows and grassland habitats as far as practicable. Potential impacts on hedgerows are assessed in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]** and **ES Volume 1, Chapter 10: Arboriculture [APP-062]**, which consider baseline conditions and evaluate likely effects on hedgerow features during construction, operation and decommissioning. The assessments identify that some hedgerow loss is required to facilitate access and infrastructure. However, anticipated hedgerow losses represent a small proportion of the existing hedgerow network within the Order Limits. With embedded mitigation in place, such as safeguarding of all retained hedgerows through appropriately protective fencing and maintenance of undeveloped buffer zones, no significant adverse effects on hedgerow features are anticipated. Compensatory planting and enhancement measures are proposed which will significantly exceed the extent of hedgerow loss. Proposed new hedgerows and habitat enhancements are illustrated in **ES Volume 2, Figure 3-4: Landscape and Ecological Mitigation Plan [APP-084]** and detailed in the **Outline Landscape and Ecological Management Plan**

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				(OLEMP) [APP-283]. The preparation, approval and implementation of the detailed Landscape and Ecological Management Plan, substantially in accordance with the **OLEMP [APP-283]**, are secured through Requirement 7 in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring hedgerow retention, replacement planting and long-term management are delivered and maintained throughout the lifetime of the Scheme. No veteran or ancient trees are proposed to be removed to facilitate the Scheme. The Scheme has been designed through an iterative process to retain existing arboricultural features as far as practicable and to avoid and reduce impacts on trees, groups of trees and woodland. Potential impacts on arboriculture are fully assessed in **ES Volume 1, Chapter 10: Arboriculture [APP-062]**, which considers baseline arboricultural conditions and evaluates likely effects during construction, operation and decommissioning. This assessment identifies where tree removal or pruning may be required and concludes that, with embedded mitigation in place, no significant adverse residual effects on arboricultural features are anticipated. Embedded mitigation measures include sensitive siting of infrastructure, minimum offsets from retained trees, protection of root protection areas, supervision by an Arboricultural Clerk of Works, and the use of trenchless construction techniques where required to avoid impacts on high-value trees. Where any unavoidable tree losses are necessary, compensatory tree and woodland planting is proposed as part of the Scheme's landscape and ecological mitigation. Details of tree protection, replacement planting and long-term management are set out in the **Outline Landscape and Ecological Management Plan [APP-283]** and the **Outline Construction Environmental Management Plan [APP-277]**.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				The preparation, approval and implementation of detailed landscape and ecological and construction environmental management plans, substantially in accordance with the outline plans, are secured through requirements in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that arboricultural mitigation measures are delivered and maintained throughout the lifetime of the Scheme.
FRN-014	Ecology and Biodiversity	Impact on Habitats	Security fencing, concrete foundations for the panels, and the panels themselves will not be good habitats and would be a major deterrent to the return of biodiversity.	Potential impacts on ecology and biodiversity, including the potential effects of boundary treatments, fencing and the panels themselves on ecology and wildlife movement, are fully assessed in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**. This assessment considers baseline ecological conditions and evaluates likely significant effects arising during the construction, operation and decommissioning phases of the Scheme. It identifies avoidance, mitigation and enhancement measures to address potential impacts on habitats and protected and notable species, including measures to avoid or mitigate barriers to wildlife movement.. The assessment concludes that, with embedded and additional mitigation measures in place, no unacceptable significant adverse effects on ecology and biodiversity are anticipated. The Scheme design incorporates fencing around the Solar PV Arrays that is permeable to wildlife, with the exception of deer. This means animals (excluding deer only) will be able to freely access habitats within the Solar PV Sites without the need for wildlife gates. In addition, wide buffers are retained around the peripheries of the Solar PV Sites to allow wildlife, including deer, to move between favoured habitats. These measures are described in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]** and secured in the **Outline Ecological Protection and Mitigation Strategy (OEPMS) [APP-284]**. Fencing will be subject to regular inspection and maintenance to ensure continued permeability to wildlife and effective functioning over the lifetime of the Scheme.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				During construction, specific measures are proposed to avoid disturbance and displacement of wildlife. These include protective buffers around sensitive habitats and features, timing restrictions on vegetation clearance, pre-construction ecological surveys, species-specific mitigation, and pollution prevention controls which are set out in the **Outline Ecological Protection and Mitigation Strategy (EPMS) [APP-284]**. Measures to protect trees and hedgerows are also set out in **ES Volume 1, Chapter 10: Arboriculture [APP-062]**. Details of tree protection, replacement planting and long-term management are set out in the **Outline Landscape and Ecological Management Plan [APP-283]** and the **Outline Construction Environmental Management Plan [APP-277]**. The Scheme will also result in the cessation of intensive arable farming within the Solar PV Sites. As identified in **ES Volume 1, Chapter 9 [APP-061]**, this is expected to reduce the ongoing application of herbicides and pesticides, supporting improvements in habitat quality over the operational lifetime of the Scheme. The reversion of existing arable land within the Solar PV Sites to predominantly grassland habitats can be expected to benefit a wide range protected and notable species, as identified in **ES Volume 1, Chapter 9 [APP-061]**. Mitigation and enhancement measures, including habitat creation, species protection measures, buffer zones and long-term ecological management, are detailed in the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]** and the **Outline Ecological Protection and Mitigation Strategy (OEPMS) [APP-284]**. Measures for ongoing ecological management and maintenance are also set out in the **OLEMP [APP-283]**. The preparation, approval and implementation of the detailed Landscape and Ecological Management Plan, substantially in accordance with the **OLEMP [APP-283]**, are secured through Requirement 7 in Schedule 2 of the **Draft Development**

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				Consent Order [APP-016]. The preparation, approval and implementation of the detailed Ecological Protection and Mitigation Strategy, substantially in accordance with the **OEPMS [APP-284]**, are secured through Requirement 8 in Schedule 2 of the **Draft Development Consent Order [APP-016]**. These requirements ensure that ecological protection, fencing design and maintenance, and ecological enhancement measures are delivered and maintained throughout construction, operation and the lifetime of the Scheme.
FRN-015	Construction and Decommissioning	Recycling	RECYCLING/RESTORATION The solar panels will not be recyclable, once they reach the end of their useful life, they will become toxic landfill.	The **Outline Operational Environmental Management Plan (OEMP) [APP-278]**, secured by Schedule 2, Requirement 14 of the **Draft DCO [APP-016]**, sets out the commitment of the Applicant to maximise recycling and reuse of the Scheme components at the end of their life. Section 4 of **ES Volume 1, Chapter 20: Other Environmental Matters [APP-072]** sets out that due to the market and policy trends, it is assumed that specialist regional or national facilities would be in place at the time of component replacement e.g. solar panels and batteries and decommissioning, and these would be developed in response to demand generated by the UK-wide solar PV panel industry and would be reused, recycled, or recovered and not disposed of to landfill. Details of how the panels and Battery Energy Storage System (BESS) will be disposed of are provided within Section 4 of **ES Volume 1, Chapter 20: Other Environmental Matters [APP-072]** which states that recycling routes are generally available for component replacement waste at present, and it is likely that there will be even greater opportunities for recycling in the future, not least because the recycling market will have expanded to meet demand as solar PV installations increase. It is likely that the solar PV panels and battery waste generated by the Scheme, during operation and maintenance and decommissioning phases, would be managed by specialist regional or national facilities; these facilities would be developed

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				over the operation and maintenance phase of the Scheme in response to demand generated by the UK-wide solar energy industry. The capacity of such facilities is not expected to be influenced by other non-solar farm projects in the surrounding area; this is because the facilities will only be managing specific solar PV panel waste. In addition, private sector waste companies will develop these facilities to respond to market demands. At present, solar PV panel waste generation is low, therefore there is a limited demand for facilities and their associated limited available capacity. It is therefore expected that the facilities which reuse, recycle, or recover end of-life solar PV panels will be developed as the quantities of this waste stream increase. The Waste Electrical and Electronic Equipment (WEEE) Regulations 2013 and The Waste Batteries and Accumulators (Amendment) Regulations 2015 place obligations on companies who place solar PV panels and batteries on the market to finance the costs of collection, treatment, recovery and environmentally sound disposal; and the landfill tax strongly incentivise reuse, recycling and recovery. The preparation and implementation of the detailed Operational Environmental Management Plan, substantially in accordance with the Outline OEMP, is secured through Requirement 14 in Schedule 2 of the **Draft Development Consent Order [APP-016]**.
FRN-016	Construction and Decommissioning	Land Restoration	The land, once covered in concrete pads for the panels, is highly unlikely to be restored to its former agricultural purpose, so will become a vast area of brownfield lan	The effects of decommissioning on soils and agricultural land are assessed in **ES Volume 1, Chapter 17: Soils and Agriculture [APP-069]**. As stated in this chapter, all land will be returned to its original use and condition as far as practicable and returned to the landowner. The effect on agricultural land quality at decommissioning would be influenced by the extent of disturbance caused by the removal of the Solar PV Panels, for example the presence and dimensions of leftover voids or the depth of the remaining underground cables. Currently, the most environmentally acceptable option is to leave the cables in-situ,

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				although the cables could be removed by excavating at regular intervals and pulling the cable through to the extraction point, thus avoiding the need to excavate the entire cable trench. In either case, the effects would be less than those likely to occur during the construction phase. **ES Volume 1, Chapter 13: Transport and Access [APP-065]** conclude that transport impacts during the construction phase on road driver and passenger delay, severance, highway and NMU users' safety would be negligible to minor adverse. Built aspects of the Scheme such as the BESS Area and substations are also subject to the proposal to return the land to its original use and condition, which is primarily agricultural land of Subgrade 3b quality, with some Subgrade 3a at the BESS Area. Measures to manage decommissioning and reinstatement are set out in the **Outline Decommissioning Strategy [APP-279]**, which has been submitted as part of the DCO Application. The Decommissioning Strategy will include robust methodologies and control points to avoid contamination of the underlying land with physical or chemical contaminants and will be applied in conjunction with the Soil Resources Management Plan (SRMP) in order to promote successful reinstatement. A detailed Decommissioning Strategy will be prepared substantially in accordance with the **Outline Decommissioning Strategy [APP-279]** and must be submitted to and approved by the relevant local planning authority prior to the commencement of decommissioning. This is secured through Requirement 20 in Schedule 2 of the **Draft Development Consent Order [APP-016]**. In addition, the Applicant is seeking a time-limited consent for the Scheme to have an operational period of 60 years, with decommissioning to take place following cessation of operation. This is secured by Requirement 20 in Schedule 2 of the **Draft DCO [APP-016]**. The Applicant confirms that none of the land will be considered brownfield after decommissioning. The expectation is that the

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				land will return to farming, but the Applicant cannot dictate what will happen to the land post-decommissioning when the Applicant no longer has an interest in the land.

4.14 Helen Hood Business

Table 4-14 RR-1826

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
HHB-001	Socio-Economics, Tourism and Recreation	Tourism	I strongly believe that tourism will dramatically decrease if the proposed plan goes ahead - people visit the area and use our B&B because it is so incredibly unspoilt and quiet. Guests have indicated already that they would not visit if the area was ruined by solar panels - they would choose another destination. I feel this way too. The proposal removes our ability to continue our business. This would be financially damaging,	The potential effects of the Scheme on tourism and recreation are assessed in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]**, supported by **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]**. The assessment considers baseline tourism activity, visitor attractions, recreational assets and tourism-dependent businesses within the study area. The assessment evaluates potential effects on the use, enjoyment and desirability of nearby tourism destinations, including impacts on individual visitor attractions, recreational routes, events and businesses reliant on tourism. It also considers how changes to landscape character or visual amenity (as assessed in **ES Volume 1, Chapter 8: Landscape and Visual Impact [APP-060]**) as a result of the Scheme are anticipated to influence visitor behaviour. The assessment acknowledges the Scheme is likely to have an adverse effect on the tourism economy, and while some localised effects on tourism receptors are anticipated to occur, overall, there is not anticipated to be a significant effect on the wider tourism economy. Additional mitigation measures through the **Outline Skills, Supply Chain and Employment Plan [APP-285]** seek to reduce tourism employment losses through focussing on local recruitment, promoting local suppliers where practicable, and through providing retraining opportunities for workers in tourism-dependent industries. A detailed skills, supply chain and employment plan for each part of the authorised development (substantially in accordance with the **Outline Skills, Supply Chain and Employment Plan [APP-285]**) must be submitted to and approved by the local planning authority before that part of the authorised development may commence. This approach is secured by Requirement 18 in Schedule 2 to the **Draft DCO [APP-016]**.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
HHB-002	Description and DCO Process	Summary	as well as all the other reasons which make this scheme unsuitable - traffic, noise, biodiversity, heritage, mental health, health, fire risk, food security etc etc. to allow this to go ahead really is an unacceptable conversion of rural communities to full on industrialisation - it's immoral.	Traffic The potential effects of construction traffic on the local highway network are assessed in **ES Volume 1, Chapter 13: Transport and Access [APP-065]**, which considers construction vehicle movements, traffic volumes, road safety and effects on road users. This concludes that there would be negligible to minor adverse effects to the highway network which are non-significant. Construction vehicle movements will be managed through a Construction Traffic Management Plan. An **Outline Construction Traffic Management Plan (OCTMP) [APP-287]** has been prepared and submitted with the DCO application. The aim of the CTMP is to ensure that the effect of the construction phase on the local highway network is minimised. Noise The noise impacts from the operation of the Scheme and its components are assessed in Section 14.10 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**. As shown in Table 8 and Table 9 of **ES Volume 3, Appendix 14-4: Noise Modelling [APP-237]**, levels would typically be below or slightly above the existing background sound in the area during the day and night. The **Outline Operational Environmental Management Plan [APP-278]** commits to noise levels from the Scheme at residential dwellings being the same as or below those modelled in the ES. This provides assurance that significant effects from operational noise will be avoided, while allowing flexibility in how this is achieved. The preparation, approval and implementation of the detailed OEMP, substantially in accordance with the outline plan, are secured through Requirement 14 of Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring operational noise is appropriately controlled throughout the

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				lifetime of the Scheme. <u>Biodiversity</u> Potential impacts on ecology and biodiversity are fully assessed in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**. This assessment considers baseline ecological conditions and evaluates likely significant effects arising during the construction, operation and decommissioning phases of the Scheme. It identifies avoidance, mitigation and enhancement measures to address potential impacts on habitats and protected and notable species. It also identifies opportunities for ecological enhancement, including the creation and long-term management of habitats, and delivery of biodiversity net gain. The assessment concludes that, with embedded and additional mitigation measures in place, no unacceptable significant adverse effects on ecology and biodiversity are anticipated. <u>Heritage</u> The potential effects of the Scheme on cultural heritage, including archaeological assets dated to the Roman and medieval periods, are fully assessed in **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, supported by detailed technical appendices in **ES Volume 3, Appendices 12-1 to 12-8 [APP-219 to APP-232]**. The chapter considers baseline conditions, identifies built and archaeological heritage assets within the study area, and assesses likely effects during construction, operation and decommissioning, including effects on setting. The chapter concluded that following mitigation, residual effects would be either neutral/negligible or minor/moderate and therefore not significant. <u>Mental Health</u>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				Impacts on mental health and wellbeing are assessed in **ES Volume 1, Chapter 18: Human Health [APP-070]**. This chapter provides a comprehensive assessment of the Scheme's potential effects on human health, including mental health and wellbeing, through consideration of a broad range of health determinants. These include access to open space and recreation, transport and connectivity, community identity and cohesion, employment and income, noise and vibration, air quality, and access to health and social care services. The assessment applies a health "*lens*" to the findings of relevant technical chapters and concludes that, with embedded mitigation and additional measures secured, the Scheme would not give rise to significant adverse effects on population health, including mental health and wellbeing. <u>Fire risk</u> The Battery Energy Storage System (BESS) containers proposed for the Scheme will incorporate built-in safety features for fire avoidance, detection and suppression. The Scheme layout also incorporates separation distances between battery containers to ensure that any isolated fire would not become widespread or lead to a major incident. As shown on **ES Volume 2, Figure 3-1: Indicative Site Layout Plan [APP-081]**, the battery containers will be located more than 200 metres from the nearest Public Right of Way and more than 500 metres from any residential receptors. The Applicant is discussing the approach to BESS safety with Dorset and Wiltshire Fire and Rescue Service (D&WFRS) and this discussion will be set out in the relevant Statement of Common Ground to be submitted at Deadline 1. An **Outline Battery Safety Management Plan (OBSMP)**

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				[APP-286] has been prepared for the Scheme using guidance from Dorset and Wiltshire Fire and Rescue Service and incorporating recommendations of the National Fire Chiefs Council. The OBSMP ensures that risks associated with battery storage are appropriately mitigated. Section 6.1.1 of the OBSMP confirms that at the detailed design stage, the selected BESS will have undertaken Large Scale Fire Testing (LSFT) to fully inform inputs for risk assessment tools which will be utilised together with detailed consequence modelling to provide a comprehensive site operations and emergency response safety audit. LSFT is a mandatory requirement under NFPA 855 (2026) safety standards to demonstrate thermal insulation protection capabilities of the BESS enclosure design, validate minimum equipment spacing distances, and demonstrate that deflagrations do not occur and/or can be safely constrained. As set out in the **OBSMP [APP-286]**, the BESS Area will have a robust and validated Emergency Response Plan (ERP), developed in consultation with Dorset & Wiltshire Fire and Rescue Service at the detailed design stage. Section 5.4 of the OBSMP specifies the typical emergency response protocols, procedures and safety information that will be included in the ERP. The ERP will apply to all stages of the Scheme, including construction, operation and decommissioning. Potential effects of toxic gases arising from a BESS fire are assessed in **ES Volume 1, Chapter 15: Air Quality [APP-067]** and **in ES Volume 1, Chapter 20: Other Environmental Matters [APP-072]**, Section 20.7: Major Accidents and Disasters. An assessment of how these fumes could affect sensitive receptors within a 1 km radius of the BESS Area, including residential properties and ecological receptors, is provided in **ES Volume 1, Chapter 15: Air Quality [APP-067]**. This assessment concludes that no

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				significant off-site impacts are predicted should a fire event occur. In the unlikely event of a fire, the precautionary measures set out in the **Outline Battery Safety Management Plan (OBSMP) [APP-286]** — including advice to remain indoors and close windows — would further reduce potential impacts to residents. The **OBSMP [APP-286]** is secured through Requirement 6 (Battery safety management) in Schedule 2 of **the Draft DCO [APP-016]**, which provides that Work No. 2 must not commence until a Battery Safety Management Plan has been submitted to and approved by the relevant planning authority. The approved plan must be substantially in accordance with the Outline Battery Safety Management Plan. The Draft DCO also requires the relevant planning authority to consult with Dorset and Wiltshire Fire and Rescue Service and the Environment Agency before determining the application, and that the Battery Safety Management Plan must be implemented as approved. Food security The effects of the Scheme on agricultural land, including land quality and productivity, are assessed in **ES Volume 1, Chapter 17: Soils and Agriculture [APP-069]**, supported by **ES Volume 3, Appendix 17-1: Agricultural Land Classification and Soil Resource Survey Report [APP-243]**. That assessment identifies that the majority of agricultural land affected is not Best and Most Versatile (BMV) and, comprising predominantly Subgrade 3b and Grade 4 land, which is not considered high-quality agricultural land in planning terms. Government-led agricultural initiatives, such as the Sustainable Farming Incentive which is relaunching later in 2026, have prioritised soil health, environmental enhancement and climate resilience,

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				recognising that long-term food security is influenced by a range of factors beyond land take alone, including soil condition, climate change and environmental pressures. The Scheme allows soils to remain in situ and undisturbed during operation, supporting soil recovery and long-term land health, with land reinstated and returned to agricultural use as far as practicable following decommissioning. No permanent loss of agricultural land is anticipated. The Applicant does not consider that food security will be compromised by the Scheme (or solar energy more widely). The latest figures to September 2024 indicate that solar occupied around 21,200 ha of agricultural land in the UK. In 2025, 545,000 ha of arable land in England were left uncropped (source: Department for Environment, Food & Rural Affairs, Agricultural land use in England at 1 June 2025). It should also be noted that food security is not identified as an issue within the suite of Energy National Policy Statements or the National Planning Policy Framework (NPPF). Further, the Government's UK Solar Roadmap (2025) states that solar development is not considered to compromise food security, but that the climate and nature crisis poses the greatest long-term risk to food security - a risk which the Scheme directly helps to address by providing a secure, low-carbon source of electricity. As set out in Section 2 of the **Outline Decommissioning Strategy [APP-279],** post-decommissioning of the Scheme, the landowners would choose how the land is to be used and managed. The landowner may return all of the land to arable use, although it is likely that established habitats such as hedgerows and woodland would be retained given their potential benefits to agricultural land and the wider farming estate.

4.15 Stop Beacon Solar

Table 4-15 RR-4494

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
SBS-001	Landscape and Visual	Introduction	To Whom It May Concern, I am writing on behalf of Stop Beacon Solar to formally object to the Lime Down Solar proposal. While we recognise the importance of renewable energy generation, this proposal represents an inappropriate and disproportionate development that would cause significant and irreversible harm to the local landscape, agricultural land, rural character, and surrounding communities.	The Applicant is confident that the proposed management and mitigation measures set out in the **ES [APP-052 to APP-265]** are comprehensive and robust and that the Scheme aligns with national and local planning policy; this is outlined in the **Planning Statement [APP-267].** Of particular relevance are Annex A: National Policy Statement Accordance Tables and Annex B: Local Policy Accordance Tables, of the Planning Statement which set out an appraisal of the Scheme against the policies. The Applicant confirms that these matters have been addressed in detail in the responses below.
SBS-002	Landscape and Visual	Visual Impact	Scale and Landscape Harm. The sheer scale of the Lime Down Solar proposal would industrialise a predominantly rural landscape, fundamentally altering its character. The development would introduce extensive fencing, panel arrays, substations, access tracks, and associated infrastructure across open countryside, resulting in long-term visual harm that cannot be adequately mitigated. This level of development is wholly at odds with the established rural setting.	The Scheme has been designed to deliver the greatest possible benefit from the available land and the available grid connection, whilst avoiding, minimising and/or mitigating harmful environmental effects. The effects of the Scheme have been assessed in the Landscape and Visual Impact Assessment (LVIA) presented in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**. The LVIA assesses effects on identified landscape and visual receptors, including residential properties and users of public rights of way, and identifies where significant effects may occur. The LVIA recognises that there would be temporary Moderate Adverse effects on Landscape Character within the 1 km as a result of the change in land use from arable farmland to solar infrastructure. However, the Scheme proposes significant mitigation measures to reduce the effects of the Scheme on landscape character which will provide significant beneficial effects to the fabric of the Sites and the legacy Landscape As per the description set out in **ES Volume 1, Chapter 3: The Scheme [APP-055]** the total area within the DCO Order Limits

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				encompasses approximately 1,237 hectares (ha). Of this, the 'Solar PV Sites' comprise approximately 749.1 ha of land. Around 479.5 ha of this land is proposed as being required for installation of solar PV, battery storage, and associated infrastructure. The remaining 269.5 ha would provide areas dedicated to ecological mitigation, measurable Biodiversity Net Gain (BNG) delivery, landscaping, offsets and agricultural land managed for environmental enhancement and habitat creation. The Applicant remains committed to delivering a Scheme that makes a meaningful contribution to the UK's transition to net zero, while also seeking to minimise adverse impacts and maximise opportunities for environmental enhancement and community benefits. An assessment of landscape and visual effects are presented in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**. The Landscape and Visual Impact Assessment (LVIA) assesses effects on identified landscape and visual receptors, including residential properties, users of public rights of way and roads, and identifies where significant effects may occur. The LVIA found no significant long term visual effects to residential properties as a consequence of the Scheme. The visual effects of the Scheme are summarised in **ES Volume 3, Appendix 8-3-3 [APP-192]**. Temporary Major/Moderate and Moderate Adverse effects on visual receptors have been recorded across the Scheme during construction and at Year 1. However, for the majority of these receptors, the effects reduce to non –significant levels as a result of the embedded mitigation measures which are set out in Section 8.9 of **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]** and include landscape buffers, retention of existing hedgerows and woodland, and new planting to provide screening and integration over time.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				The assessment also identifies that there would be some long-term significant effects on the visual amenity of users of some localised footpaths, as a result of the Scheme. This predominantly relates to locations where footpaths diagonally cross fields and mitigation planting would be inappropriate to landscape character and the legacy landscape. Those receptors which would experience Significant Long Term Visual Effects are listed in Table 8-30 of the **LVIA [APP-060].** The scale of development within the Order Limits has been significantly reduced from the layout assessed in the Preliminary Environmental Information Report (PEIR) through an iterative design process undertaken in response to consultation and in accordance with the mitigation hierarchy to avoid, reduce and mitigate adverse effects. As part of this design evolution, panels along the edge of the Cotswolds National Landscape and along the Fosse Way have been removed. Mitigation measures to address landscape and visual effects are set out in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**, **Figure 3-4-1 to 3-4-5.2 Landscape and Ecology Mitigation Plan [APP-084]** and secured within the **Outline Landscape and Ecological Mitigation Plan (LEMP) [APP-283]** and the **Outline Ecological Protection and Mitigation Strategy (EPMS) [APP-284]**. These documents include proposals for new and enhanced planting, retention of existing hedgerows and woodland, and landscape integration measures to reduce visual effects over time. In addition, the Scheme design incorporates minimum offsets from existing landscape features, including residential properties, ancient woodland, woodland, hedgerows, public rights of way and watercourses, to further limit visual impacts. Although these measures reduce the effects of the Scheme on nearly all receptors, as noted above there are 10 receptors which would experience Significant Visual Effects for

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				the duration of the Scheme as set out Table 8-30 of the **LVIA [APP-060]**. Mitigation measures to address landscape and visual effects are set out in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**, **Figure 3-4-1 to 3-4-5.2 Landscape and Ecology Mitigation Plan [APP-084]**. The preparation, approval and implementation of detailed landscape and ecological management plans, substantially in accordance with the **OLEMP [APP-283]** and **EPMS [APP-284]**, are secured through requirements in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that the identified mitigation measures are delivered and maintained throughout the lifetime of the Scheme.
SBS-003	Soils and Agriculture	Loss of Agricultural Land and Food Security	Loss of Agricultural Land and Food Security The proposal would result in the loss of large areas of productive agricultural land. At a time when national policy increasingly recognises the importance of food security and sustainable land use, the permanent or long-term removal of farmland for industrial-scale solar development is unjustifiable.	The effects of the Scheme on agricultural land, including land quality and productivity, are assessed in **ES Volume 1, Chapter 17: Soils and Agriculture [APP069]**, supported by **ES Volume 3, Appendix 171: Agricultural Land Classification and Soil Resource Survey Report [APP243]**. That assessment identifies that the majority of agricultural land affected is not Best and Most Versatile (BMV) land, comprising predominantly Subgrade 3b and Grade 4 land, which is not considered highquality agricultural land in planning terms. Governmentled agricultural initiatives, such as the Sustainable Farming Incentive which is relaunching later in 2026, have prioritised soil health, environmental enhancement and climate resilience, recognising that longterm food security is influenced by a range of factors beyond land take alone, including soil condition, climate change and environmental pressures. The Scheme allows soils to remain in situ and undisturbed during operation, supporting soil recovery and longterm land health, with land reinstated and returned to agricultural use as far as practicable following decommissioning. No permanent loss of agricultural land is anticipated.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				The Applicant does not consider that food security will be compromised by the Scheme (or solar energy more widely). The latest figures to September 2024 indicate that solar occupied around 21,200 ha of agricultural land in the UK. In 2025, 545,000 ha of arable land in England were left uncropped (source: Department for Environment, Food & Rural Affairs, Agricultural land use in England at 1 June 2025). It should also be noted that food security is not identified as an issue within the suite of Energy National Policy Statements or the National Planning Policy Framework (NPPF). Further, the Government's UK Solar Roadmap (2025) states that solar development is not considered to compromise food security, but that the climate and nature crisis poses the greatest long-term risk to food security - a risk which the Scheme directly helps to address by providing a secure, low-carbon source of electricity. As set out in Section 2 of the **Outline Decommissioning Strategy [APP-279],** post-decommissioning of the Scheme, the landowners would choose how the land is to be used and managed. The landowner may return all of the land to arable use, although it is likely that established habitats such as hedgerows and woodland would be retained given their potential benefits to agricultural land and the wider farming estate.
SBS-004	Cumulative effects	Other Solar Projects in the Vicinity	Cumulative Impact This proposal cannot be viewed in isolation. When considered alongside existing and proposed solar developments in the wider area, the cumulative impact is severe. Incremental approval of large-scale solar schemes risks transforming the landscape into an energy industrial zone, contrary to planning principles	A comprehensive Cumulative and In-Combination Effects Assessment has been undertaken in accordance with Planning Inspectorate Advice Note 17 and the relevant NPS EN-1, NPS EN-3 and NPS EN-5 requirements which are set out within **ES Volume 1, Chapter 21 Cumulative and In-combination Effects [APP-073]** and associated **Appendices [APP-264**]. Interaction with proposed or consented but not yet built developments has been fully explored within each of the technical assessments **[APP-059 - APP-072]** with a summary of each of these assessments provided within **ES, Volume 1, Chapter 21 Cumulative and In-Combination Effects [APP-**

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			that seek to protect rural environments from overdevelopment.	**073].** Existing schemes are captured within the baseline environment for each technical chapter. The four-stage cumulative assessment methodology is described **within ES Volume1, Chapter 6: EIA Methodology [APP-058]**. 358 developments were included in the **Long List [APP-264**]. 41 developments are included in the short list (and are therefore assessed) including a number of proposed solar and BESS developments. The list of developments included in the cumulative assessment was reviewed and developed in consultation with Wiltshire Council. Taking a conservative worse case approach, significant cumulative effects are identified at a limited and discrete number of receptors comprising tourism and recreation impacts during the construction phase on Corsham Park, PRoW WT|CORM|122, long path and Sustrans Cycle Route 403, and on skylark at a District level.
SBS-005	Ecology and Biodiversity	Biodiversity Net Gain	Ecology and Biodiversity Concerns Claims of biodiversity net gain remain largely theoretical and unproven at this scale. The disturbance caused during construction, the long-term presence of infrastructure, and the fragmentation of habitats raise serious concerns regarding impacts on wildlife, soil health, and local ecosystems.	Potential impacts on ecology and biodiversity are fully assessed **in ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**. This assessment considers baseline ecological conditions and evaluates likely significant effects arising during the construction, operation and decommissioning phases of the Scheme. It identifies avoidance, mitigation and enhancement measures to address potential impacts on habitats and protected and notable species. It also identifies opportunities for ecological enhancement, including the creation and long-term management of habitats, and delivery of biodiversity net gain. The assessment concludes that, with the identified embedded and additional mitigation measures in place, no unacceptable significant adverse effects on ecology and biodiversity are anticipated. The Applicant is discussing the approach to the assessment in relation to ecology and biodiversity in general with Wiltshire Council and Natural England and this discussion will be set out in the relevant Statements of Common Ground to be submitted

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				at Deadline 1. During construction, specific measures are proposed to avoid disturbance and displacement of wildlife. These include protective buffers around sensitive habitats and features, timing restrictions on vegetation clearance, pre-construction ecological surveys, species-specific mitigation, and pollution prevention controls which are set out in the **Outline Ecological Protection and Mitigation Strategy (OEPMS) [APP-284]**. Measures to protect trees and hedgerows are also set out **in ES Volume 1, Chapter 10: Arboriculture [APP-062]**. The Scheme will also result in the cessation of intensive arable farming within the Solar PV Sites. As identified in **ES Volume 1, Chapter 9 Ecology and Biodiversity [APP-061]**, this is expected to reduce the ongoing application of herbicides and pesticides, supporting improvements in habitat quality over the operational lifetime of the Scheme. The reversion of existing arable land within the Solar PV Sites to predominantly grassland habitats can be expected to benefit a wide range protected and notable species, as identified in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061].** Through the establishment and maintenance of long-term grassland beneath and between the solar arrays, soil health, quality and structure are anticipated to improve over the lifetime of the Scheme, resulting in a temporary, moderate beneficial effect on soil resources at decommissioning, which is assessed as significant (**ES Volume 1, Chapter 17: Soils and Agriculture [APP-069],** Sections 17.10 and 17.12). Mitigation and enhancement measures are detailed in the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]** and the **OEPMS [APP-284]**, which set out habitat creation, species protection measures, buffer zones and long-term ecological management. The preparation, approval and implementation of the detailed

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				Landscape and Ecological Management Plan, substantially in accordance with the **OLEMP [APP-283]**, is secured through Requirement 7 in Schedule 2 of the **Draft Development Consent Order [APP-016].** The preparation, approval and implementation of the detailed Ecological Protection and Mitigation Strategy, substantially in accordance with the **OEPMS [APP-284]**, is secured through Requirement 8 in Schedule 2 of the **Draft Development Consent Order [APP-016].** These requirements ensure that ecological protection and enhancement measures are delivered and maintained throughout construction and operation of the Scheme. The Scheme's baseline biodiversity units have been calculated with the use of the DEFRA published standardised Statutory Biodiversity Metric ('the Metric') and based on comprehensive habitat surveys undertaken by the Applicant's professional ecologists. The Metric has been used to compare the baseline biodiversity units with the projected post-development units. The projected post-development units have been calculated based on the habitat creation and enhancement measures shown in **ES Volume 2, Figure 3-4: Landscape and Ecological Mitigation Plan [APP-084]** and detailed in the **OLEMP [APP-283]**. Details of the Scheme's approach to BNG are provided in the **Biodiversity Net Gain Report [APP-273]** and the full BNG calculations are provided in a copy of the Metric **[APP-274]**. Whilst BNG for NSIPs such as the Scheme is not yet mandatory, the preparation, approval and implementation of the detailed Landscape and Ecological Management Plan, substantially in accordance with the **OLEMP [APP-283]**, are secured through Requirement 7 in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that the identified habitat creation and enhancement measures will be delivered and maintained throughout the lifetime of the Scheme. Furthermore Requirement 9 of the **Draft Development Consent Order [APP-016]** specifically secures the provision of a minimum 10% Biodiversity Net Gain

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
SBS-006	Community Benefits	Local Community and Democracy	Community Impact and Democratic Deficit Local opposition to the Lime Down Solar proposal is substantial and well-documented. Communities feel excluded from decision-making processes and burdened by developments that provide little tangible benefit to local residents while imposing significant environmental and social costs.	The Applicant considers that the statutory consultation has been robust, thorough and undertaken in accordance with the requirements of the Planning Act 2008, the Environmental Impact Assessment (EIA) regulations, and the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009. The **Consultation Report [APP-022]** sets out the Applicant's approach to pre-application consultation. The Applicant also notes that the examination process provides a further opportunity for interested parties to comment on the Scheme. This examination is managed by an independently appointed Examining Authority. Further to this, the Applicant provided an extended relevant representation period beyond the minimum statutory timeframe to allow sufficient time for members of the public to review the submitted application documents and register as an interested party. The Applicant furthermore refers to the commitment for the provision of a community liaison group to be set up prior to construction commencing, who will act as the go-to body for queries, complaints or communication between members of the public and the construction contractors. This is secured through Requirement 4 of Schedule 2 to the **Draft DCO [APP-016]**. The Applicant acknowledges that any adverse effects from the Scheme are more likely to be felt locally when compared to the largely wider-scale benefits of the Scheme. The Scheme is anticipated to help meet the UK's net zero requirements for energy production, which is considered a critical national priority and set out in National Policy Statements for Energy NPS EN-1 (section 4.2) and EN-3. This therefore will benefit the national population in addition to the local population. The Scheme is also anticipated to benefit the population within approximately 20km of the Scheme, through providing

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				employment and income especially during construction and peak replacement activities (as assessed in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]**), and providing skills and training opportunities (as secured through the **OSSCEP [APP-285]** through Requirement 18 of Schedule 2 to the **Draft DCO [APP-016]**). Where the Scheme is anticipated to benefit local people more specifically, this is done through providing onsite permissive paths to increase access to the countryside, providing improved landscape planting through reinforcing existing hedgerows and planting of new trees, providing biodiversity net gains through habitat improvements. This is secured through the **OLEMP [APP-283]** and **OPROWPPMP [APP-282]** through Requirements 7 and 16 of Schedule 2 to the **Draft DCO [APP-016]**. That notwithstanding, the Applicant is committed to providing a Community Benefit Fund to allow for community-driven benefits that are not necessarily associated with the Scheme itself. The purpose is to establish a means to recognise local community needs that the Applicant wants to be able to contribute towards in recognition of the local impact of the Scheme.
SBS-007	Site Selection and Alternatives	Location	Unsustainable Development in the Wrong Location Renewable energy should be delivered in a way that is proportionate, sensitively located, and aligned with local and national planning policy. This proposal fails that test. Large-scale solar developments should prioritise brownfield land, rooftops, and previously developed sites, rather than undeveloped countryside.	The Scheme has been designed and assessed in line with local and national planning policy. Further details regarding how the Scheme complies with policy, and the weight given to likely significant effects in Secretary of State decision making, can be found in the **Planning Statement [APP-267].** In particular, Annex A and B of the Planning Statement provide a comprehensive assessment of the Scheme's compliance with local and national planning policy. In relation to suggestions that brownfield land or alternative locations should be used, including rooftop, these matters are addressed **in ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP-056], ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185] and in the**

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				Statement of Need [APP-266]. **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]** provides further details on the brownfield land that has been considered, through a review of the brownfield land registers for the relevant local authorities. However, no brownfield sites were identified that would meet the minimum threshold of 40ha required for land parcels to be considered for inclusion in the Scheme. Further, many of the brownfield sites contained within the registers were either already in use or proposed to be used for other developments. The Applicant also considered commercial rooftops, but their use was not considered viable for a scheme of this size. Further in relation to the use of rooftops, national policy and government guidance, as set out in the **Statement of Need [APP-266],** recognises that while rooftop and smaller-scale solar installations are an important part of the energy mix, they cannot alone meet the scale of capacity required to achieve clean power and net zero objectives. Large-scale ground-mounted solar therefore remains necessary in addition to, not instead of, rooftop solar.
SBS-008	Description and DCO Process	Conclusion	Conclusion For the reasons outlined above, Stop Beacon Solar strongly objects to the Lime Down Solar proposal and urges the planning authority to refuse consent. We support renewable energy in principle, but not at the expense of rural landscapes, agricultural land, and local communities. We respectfully request that the cumulative impacts, landscape harm, and loss of agricultural land are given significant weight in the determination of this application. Yours faithfully, Stop Beacon Solar	The Applicant confirms that these matters have been addressed in detail in the responses above. As to the weight that should be given to cumulative impacts, landscape and loss of agricultural land, the Applicant's position regarding the appropriate weight is set out in the **Planning Statement [APP-267]**. It is considered that cumulative impacts should be given neutral weight, landscape and visual impacts should be afforded moderate negative weight and agricultural land should be afforded moderate negative weight. However, it is considered that the clear and substantial benefits of the Scheme (i.e. the Scheme's contribution to electricity generation and security of supply, the positive impacts on climate change and greenhouse gas emissions, biological enhancements, creation of permissive paths, job creation and skills training) far

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				outweigh the negative impacts and that the balance lies in favour of making the development consent order.

4.16 Big Bull Storage Limited

Table 4-16 RR-0505

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
BSL-001	Transport and Access	Traffic Impact	I object to this project on a few grounds. I object to the amount of traffic with HGV vehicles on narrow lanes. The number of vehicles needed for this is substantial and the highways network here is completely unsuitable.	The number of HGV's is not considered unsuitable based on the assessment of potential effects of construction vehicles on the highway network. The potential effects of construction traffic on the local highway network are assessed in **ES Volume 1, Chapter 13: Transport and Access [APP-065]** , which consider construction vehicle movements, traffic volumes, vehicle types, route suitability, road safety, effects on road users, and network performance. The assessment concludes that, with appropriate mitigation in place, there would be no significant adverse impacts on the local highway network. Supporting technical information is provided in **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]**, including Annex H, which demonstrates adequate carriageway width or frequency of passing place opportunity to pass at least an HGV and a light vehicle as requested in comments provided by Wiltshire Council, and identifies specific locations where traffic management measures or passing arrangements may be required on narrower sections of construction routes. All construction routes also include passing points to allow two HGVs to pass. The assessment concludes that the level of construction traffic associated with the Scheme is unlikely to materially affect road safety on links within the Study Area, and no significant adverse effects on accident risk are anticipated. The assessment additionally concludes that with appropriate mitigation such as the CTMP in place, there would be no significant adverse impacts on the local highway network during the construction, operation and maintenance, and decommissioning phases of the Scheme. Construction vehicle movements will be managed through a Construction Traffic Management Plan. An **Outline Construction Traffic Management Plan (CTMP) [APP-287]** has been prepared and submitted with the DCO application, with the aim of ensuring that the effect of the construction phase on the local highway network is minimised. The

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				Outline CTMP [APP-287] sets out measures to coordinate construction deliveries by HGVs to arrive and depart between 09:30 and 16:30 where possible, to avoid peak network hours of 08:00–09:00 and 17:00–18:00, and includes a community liaison element to keep local communities informed about the construction process and to provide a contact for feedback should any issues arise. Compliance with the CTMP will be monitored by the Developer, Contractor and Wiltshire Council as local highway authority. The preparation, approval and implementation of the final CTMP, substantially in accordance with the **Outline CTMP [APP-287]**, are secured through Requirement 15 of Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring construction traffic impacts are appropriately managed throughout the construction phase of the Scheme.
BSL-002	Cultural Heritage	Fosse Way	I object to the proposed use of the Roman road of the fosseway. This is a destruction of an ancient heritage road.	The potential effects of the Scheme on the Roman Roads (i.e. the Fosse Way), as well as other Roman archaeological assets are fully assessed in **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, supported by detailed technical appendices in **ES Volume 3, Appendices 12-1 to 12-7 [APP-219 to APP-231]**. Where an adverse effect has been identified to Roman archaeological assets appropriate mitigation in the form of preservation in situ or Strip, Map and Record is proposed. See Section 12.9 of **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]** for embedded mitigation and Section 12.11 for additional mitigation. The chapter concluded that following mitigation, residual effects would be either neutral/negligible or minor/moderate and therefore not significant. An overarching archaeological mitigation strategy is provided in **ES Volume 3, Appendix 12.6 Archaeological Mitigation**

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				Strategy [APP-230] secured through Requirement 12 of the DCO.
BSL-003	Noise and Vibration	Noise Pollution	I object to the noise that will be caused by some of the installations once they are up and running. This area is known for its peacefullness and birdsong. Having this industrial noise come from.such a rural location.	An assessment of the effects of the Scheme on noise and vibration is provided in **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**, with supporting technical information supplied in **ES Volume 3, Appendix 14-4: Noise Modelling [APP-237]**. The assessment considers potential noise and vibration impacts during construction, operation (see conclusions below) and decommissioning, including from solar PV panels and associated infrastructure. The Applicant notes that the approach to noise and vibration has been discussed with Wiltshire Council, as described in Section 14.2 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**. Construction phase The noise and vibration impacts arising from construction activities are assessed in Section 14.10 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**. For the purposes of the assessment, a reasonable worst-case scenario assuming piling activities has been considered. Mitigation measures associated with construction activity are presented in Section 14.9 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]** and are committed to through the **Outline Construction Environmental Management Plan [APP-277]**. With these measures in place, the assessment concludes that no significant effects from construction noise or vibration are expected. A noise monitoring programme agreed with Wiltshire Council will be carried out during construction. The preparation, approval and implementation of the Construction Environmental Management Plan, substantially in accordance with the **Outline CEMP [APP-277]**, is secured

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				through Requirement 13 in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that construction noise and vibration are appropriately controlled. Operational phase The noise impacts from the operation of the Scheme and its components are assessed in Section 14.10 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**, with supporting modelling provided in **ES Volume 3, Appendix 14-4: Noise Modelling [APP-237]**. A penalty has been applied to predicted noise levels from the Solar PV Sites to account for the distinctive nature of the sound. Potential mitigation measures are detailed in Section 14.9 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**, and with such measures in place, significant effects from operational noise are not expected. The **Outline Operational Environmental Management Plan [APP-278]** commits to noise levels from the Scheme at residential dwellings being the same as or below those modelled in the ES. This provides assurance that significant effects from operational noise will be avoided, while allowing flexibility in how this is achieved. The preparation, approval and implementation of the detailed OEMP, substantially in accordance with the outline plan, are secured through Requirement 14 of Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring operational noise is appropriately controlled throughout the lifetime of the Scheme. The impacts of noise generated from elements of the Scheme during the operational phase on wildlife, including birds, is assessed in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061].** The assessment concludes that

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				noise levels will not have a significant adverse effect on wildlife, including birds.
BSL-004	Socio-Economics, Tourism and Recreation	Use and Desirability of PRoWs	I object to The significant impact all the fencing, lighting, panels will have on the rural walks and footpaths. Only today in the Newspaper the Princess of Wales has been talking about the importance of rural walks for mental health. These footpaths will be like walking through an industrial landscape as the fences will be close to the paths on both sides.	A detailed assessment of the likely significance of effects from the Scheme on the use and desirability of individual PRoWs and recreational access to the countryside is included in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** and **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]**. This assessment considers the impact on individual recreational routes, including their practical use, enjoyment and desirability. The assessment finds no significant residual effects to individual PROWs or the PROW network overall. However, residual significant effects are anticipated to some long-distance recreation routes during all phases of the Scheme due to their regional or national importance. The assessment in **ES Volume 1, Chapter 18: Human Health [APP-070]** goes on to assess the physical and mental health impacts of changes to recreation and countryside access under the assessment topic 'open space, leisure and play', finding that no significant adverse effects are anticipated at any phase of the Scheme. The Applicant notes that the approach to recreation and access to the countryside has been agreed with Wiltshire Council's Public Health team and is under discussion with Wiltshire Council's Countryside Access Team. This is set out in the Statement of Common Ground with Wiltshire Council to be submitted at Deadline 1.
SBL-005	Socio-Economics, Tourism and Recreation	Impact on Bridleways	I am (Redacted) and I value the rural walks and also rural horse riding. I regarly ride through Seagry wood towards Stanton and then take the bridlepath all the way to Rodbourne.	Impact on the bridleways and unsurfaced road affected by Lime Down E have been assessed in **ES Volume 1 Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** and the supporting **ES Volume 3 Appendix 16-2 Tourism and Recreation Receptor Tables [APP-241].** Therein it is

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			This is one of the most beautiful rides anywhere in England.	recognised that there will be residual significant adverse effects to both unsurfaced highways due to use by HGVs during construction. Whilst mitigation measures as set out in the **OCTMP [APP-287]** and **OPROWPPMP [APP-282]**, secured respectively by Requirements 15 and 16 in Schedule 2 to the **Draft DCO [APP-016]**, are deemed to be sufficient to ensure user safety, the change of use and impact upon user experience are unable to be mitigated further, and as such will have to be considered as part of the planning balance in determining whether or not consent should be granted. Impacts from the Scheme on bridleways GSOM9/SEAG23 through Seagry Wood, SSTQ7 at Avil's Lane and MALW61/SSTQ4 connecting Avil's Lane to Rodbourne have been set out in **ES Volume 3 Appendix 16-2 Tourism and Recreation Receptor Tables [APP-241]** where the assessment finds, subject to implementation of mitigation measures to PROW users secured through the Requirements in Schedule 2 to the **Draft DCO [APP-016]**, that they are not likely to be significantly adversely affected by the Scheme.
BSL-006	Ecology and Biodiversity	Impact on Wildlife	I object to the significant impact of wildlife in the area. The bridlepath from Stanton to Rodbourne is full of wildlife. Two springs ago i saw 10 leverets playing alonside the path. There are a lot of roe deer in the area. Also hedgehogs, badgers and many other mammals. How will these animals get through the fencing? Hedgehogs only use the paths they choose and will not roam. The disturbance of these routes will be catastrophic for these animals	Potential effects of boundary treatments and fencing on ecology and wildlife movement are assessed in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**, which considers impacts on habitats and species during construction, operation and decommissioning and identifies measures to avoid or mitigate barriers to wildlife movement. The assessment concludes that, with embedded and additional mitigation measures in place, no unacceptable significant adverse effects on ecology and biodiversity are anticipated. The Scheme design incorporates fencing around the Solar PV Arrays that is permeable to wildlife, with the exception of deer. This means animals (excluding deer only) will be able

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			whose numbers have dwindled in the last 40 years.	to freely access habitats within the Solar PV Sites without the need for wildlife gates. In addition, wide buffers are retained around the peripheries of the Solar PV Sites to allow wildlife, including deer, to move between favoured habitats. These measures are described in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]** and secured in the **Outline Ecological Protection and Mitigation Strategy (OEPMS) [APP-284]**. Fencing will be subject to regular inspection and maintenance to ensure continued permeability to wildlife and effective functioning over the lifetime of the Scheme, with measures for ongoing ecological management and maintenance set out in the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]**. Potential impacts of the Scheme on mammals, including deer, hedgehogs, and badgers, are assessed in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**, which considers baseline conditions and evaluates likely effects on wildlife movement and habitat connectivity during construction, operation and decommissioning. The assessment identifies the presence of badger setts and foraging habitats within and around the Scheme and evaluates potential effects from habitat disturbance, displacement and construction activities. It concludes that, with embedded mitigation in place, no significant adverse effects on badgers are anticipated. The Applicant notes that the approach to the assessment in relation to badgers has been with Wiltshire Council and is under discussion with Natural England and Wiltshire Council and is set out in the relevant Statements of Common Ground to be submitted at Deadline 1. Mitigation measures to protect badgers include the application of minimum buffer distances around setts, timing controls on works near sensitive locations, pre-construction surveys, and habitat retention to maintain foraging and movement corridors. These measures are

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				detailed in the **Outline Ecological Protection and Mitigation Strategy (EPMS) [APP-284]** and long-term habitat management provisions are set out in the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]**. Regarding hedgehogs, the assessment concludes that, with embedded mitigation and good practice measures in place, including habitat retention, ecological buffers, and permeable fencing to maintain habitat connectivity and allow continued movement of mammals, there would be no significant adverse effects on hedgehogs. The preparation, approval and implementation of the detailed Ecological Protection and Mitigation Strategy and Landscape and Ecological Management Plan, substantially in accordance with the **EPMS [APP-284]** and **OLEMP [APP-283]**, are secured through Requirements 8 and 7 respectively in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that fencing design and maintenance measures are delivered and maintained throughout the lifetime of the Scheme. Lastly, the Applicant notes that deer populations in the UK are currently at historically high levels, and deer species are not endangered and nor are they targeted for conservation action. The Deer Act 1991 regulates the management and welfare of deer, restricting certain methods of taking or killing deer and setting closed seasons, and is primarily in place to regulate animal welfare and treatment concerns rather than for conservation purposes.
BSL-007	Description and DCO Process	Distance from the Grid	I object to the siting of this project. It is a long way from Melksham. These projects should be sited close to the grid. Wrong place.	The Applicant confirms that the existing National Grid Melksham substation has been identified as the point of connection. This decision was based on available capacity, network resilience, and strategic grid planning. As explained in **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]**, an initial search area was

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				identified at a 5 km radius from the POC, however this was later expanded as no suitable and available sites within 5 km were identified. The search area was enlarged incrementally to a 20 km radius which is considered by the Applicant to be a viable cable connection distance for a solar project of this scale. The POC and 20 km search area is shown on Figure 1, Annex C of **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]**. Further, from an operational perspective, high voltage electricity transmission at 400kV in this case, is specifically designed to minimise energy losses over long distances. As such, the approximate 20km distance involved results in negligible losses. More details on how the Cable Route Corridor has been located and designed can be found in **ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP-056]**. Several factors were considered such as taking as direct a route as possible, whilst following existing features, such as roads; and avoiding sensitive receptors as far as practicable, such as habitat designations, residential and commercial properties, heritage assets, and a large number of land interests. The assessments set out in the various chapters of the **ES [APP-052 to APP-265]** detail what impacts are expected as a result of the Scheme based on the minimum and maximum parameters of the Scheme, and the mitigation and enhancement measures that are proposed to reduce these impacts.

4.17 The Church of the Holy Cross

Table 4-17 RR-4650

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
CHC-001	Description and DCO Process	Introduction	Holy Cross Sherston Our church has concerns about the impacts of this project. The area of this project lies within the Gauzebrook Group of Churches, a benefice of eight churches which are spread between Sherston in the north and Hullavington and Stanton St Quintin in the South. All residents of the Parish of Sherston are entitled to be baptised, married and have their funeral in our Church. We provide regular services, not only to our own Parish, but also in a shared mode with the other 7 churches in the benefice.	The Applicant notes this comment.
CHC-002	Cultural Heritage	Introduction	The Church building is Grade 1 listed, and therefore of the highest level of heritage.	The Applicant notes this comment.
CHC-003	Transport and Access	Impact on Transport LInks and Connectivity	All changes to the local environment will impact us, the rural nature of the local area changing to an industrial area will be a step change affecting our ministers, volunteers, and present and future congregations within the Parish, not only on Sundays for regular worship but also pastoral ministry throughout the week. The project works will impact on the transport links between these	The proposed construction routes have been carefully assessed and are considered to be the most appropriate routes to the Scheme. These do not directly pass any of the named churches. Construction traffic would also be temporary and controlled through measures in a CTMP to minimise adverse impacts on the highway network. The construction routes proposed for the Scheme are presented in **ES Figure 13-1 and Figure 13-2 [APP-146, APP-147]**. These provide access to the Solar PV Sites and the Cable Route Corridor via Junction 17 (Lime Down D and E) and Junction 18 (Lime Down A, B and C) of the M4.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			churches, changing physical communication between the churches and the changing the quality of the area, which is attractive to many visitors, including those visiting our churches.	An **OCTMP [APP-287]** supports the DCO Application and includes outline measures to minimise transport and access impacts as far as practicable. A final CTMP would be prepared post consent and must be substantially in accordance with the **OCTMP [APP-287]** and approved by the relevant local planning authority (in consultation with the relevant highway authority and South Gloucestershire Council), as secured by Requirement 15 in Schedule 2 of the **Draft DCO [APP-016]**.
CHC-004	Cultural Heritage	Heritage Assets	The Athelstan Pilgrim Way, a pilgrimage trail based on the historical context of King Athelstan, links these churches and draws many visitors. Our church is grateful to many visitors who support our churches through donations made by them during their visit.	The Grade I Listed Church of The Holy Cross (NHLE: 1023223) is situated approximately 720m north of Lime Down A at its nearest points. Since the design presented at PEIR stage, Solar PV Panels have been removed entirely from within Fields A11 and A12, and from within the northern parts of Fields A1 and A4. No significant effects have been identified as a result of the Scheme to the Church of The Holy Cross (**see ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, supported by **ES Volume 3, Appendix 12.1: Heritage Statement [APP-219]**) Of the other 35 churches on the Athelstan Pilgrim Way, only five were assessed within the **ES Volume 3, Appendix 12.1: Heritage Statement [APP-219]** as potentially being impacted by the Scheme due to their proximity and intervisibility. These comprise Foxley Parish Church (NHLE: 1023219), Church of All Saints (NHLE: 1023214), Church of St Mary (NHLE: 1356040), Church of St Giles (NHLE: 1022362) and Church of St Mary and Saint Ethelbert (NHLE: 1199767). Foxley Parish Church is situated approximately 375m north-east of Lime Down B at their nearest points. Since the design presented at PEIR stage, Solar PV Panels have been removed entirely from within Field B12, the field which lies closest to Foxley. The nearest panels within Lime Down B will be within Field B11, approximately 760m south-west of the churchyard. Throughout Lime Down B, screening has

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				been proposed, enclosing the enhancement of existing hedgerows throughout, including along the north and north-eastern boundaries of Fields B11 and B12. No significant effects have been identified as a result of the Scheme. The Church of All Saints is situated approximately 440m south and approximately 880m east of Lime Down B at its nearest points, and approximately 250m north of Lime Down D at its nearest points. Since the design presented at PEIR stage, Solar PV Panels have been removed entirely from within Fields B1-B5, with the nearest panels situated within Fields B9 and B10 to the north and Fields D19-D21 to the south. Throughout Lime Down B and D, screening has been proposed, including the enhancement of existing hedgerows throughout, and in particular along the southern boundary of Lime Down B and the northern boundary of Lime Down D. No significant effects have been identified as a result of the Scheme. The Church of St Mary is situated approximately 980m south of Lime Down D at their nearest points. Throughout Lime Down D, screening has been proposed, including the enhancement of existing hedgerows throughout. No significant effects have been identified as a result of the Scheme. The Church of St Giles is situated approximately 160m west of Lime Down C at their nearest points. Since the design presented at PEIR stage, Solar PV Panels have been removed entirely from within Fields C1, C6 and C8 along the western boundary of Lime Down C. No significant effects have been identified as a result of the Scheme. The Church of St Mary and Saint Ethelbert is situated approximately 790m north-west of Lime Down C at their nearest points. Since the design presented at PEIR stage, Solar PV Panels have been removed entirely from within Fields C1, C6 and C8 along the western boundary of Lime

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				Down C. No significant effects have been identified as a result of the Scheme.
CHC-005	Socio-Economics, Tourism and Recreation	Impact on PRoWs and Cycle Paths	The area is highly regarded for walking and cycling, and a major annual fund raising is based on a large event, "*The Wiltshire Historic Churches Ride and Stride*" which is held annually across the area and into adjacent counties. Downgrading the attractiveness of this area will reduce the footfall and hence our fundraising capability.	PRoW such as bridleways and byways and the use of the highway network for recreational users have been considered as specific recreational receptors in the assessment in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]**. The likely effects on individual PRoW are specifically assessed in **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]**. This assessment covers each phase of the Scheme: construction, operation, peak replacement works, and decommissioning, and is based on likely visual and amenity impacts, traffic movements, and changes to the usability and desirability of PRoW. The Applicant confirms that the majority of significant adverse effects can be mitigated, however understands that some significant adverse effects to users of routes in Lime Down E cannot be mitigated further during construction. No significant residual effects are anticipated during the operational phase of the Scheme. The Applicant has committed to ensuring the operation or recreational use of PRoW is protected as much as possible through the implementation of embedded and additional mitigation measures set out in the **OCTMP [APP-287]** and **OPROWPPMP [APP-282]**, secured respectively by Requirements 15 and 16 in Schedule 2 to the **Draft DCO [APP-016]**. The Applicant therefore considers that the Scheme would not cause significant detriment to the ability for The Wiltshire Historic Churches Ride and Stride to take place or continue fundraising in future.
CHC-006	Soils and Agriculture	Stewardship of Farmland	We are concerned with plans for the stewardship of the farmland. If this project proceeds it sets a poor precedent for encouragement proper	The effects of the Scheme on agricultural land, including land quality and productivity, are assessed in **ES Volume 1, Chapter 17: Soils and Agriculture [APP069]**, supported by **ES Volume 3, Appendix 171: Agricultural Land**

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			use of our natural resources for food.	**Classification and Soil Resource Survey Report [APP243]**. That assessment identifies that the majority of agricultural land affected is not Best and Most Versatile (BMV) land, comprising predominantly Subgrade 3b and Grade 4 land, which is not considered highquality agricultural land in planning terms. Governmentled agricultural initiatives, such as the Sustainable Farming Incentive which is relaunching later in 2026, have prioritised soil health, environmental enhancement and climate resilience, recognising that longterm food security is influenced by a range of factors beyond land take alone, including soil condition, climate change and environmental pressures. The Scheme allows soils to remain in situ and undisturbed during operation, supporting soil recovery and longterm land health, with land reinstated and returned to agricultural use as far as practicable following decommissioning. No permanent loss of agricultural land is anticipated. The Applicant does not consider that food security will be compromised by the Scheme (or solar energy more widely). The latest figures to September 2024 indicate that solar occupied around 21,200 ha of agricultural land in the UK. In 2025, 545,000 ha of arable land in England were left uncropped (source: Department for Environment, Food & Rural Affairs, Agricultural land use in England at 1 June 2025). It should also be noted that food security is not identified as an issue within the suite of Energy National Policy Statements or the National Planning Policy Framework (NPPF). Further, the Government's UK Solar Roadmap (2025) states that solar development is not considered to compromise food security, but that the climate and nature crisis poses the greatest long-term risk to food security - a risk which the Scheme directly helps to address by providing a secure, low-carbon source of electricity.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				As set out in Section 2 of the **Outline Decommissioning Strategy [APP-279],** post-decommissioning of the Scheme, the landowners would choose how the land is to be used and managed. The landowner may return all of the land to arable use, although it is likely that established habitats such as hedgerows and woodland would be retained given their potential benefits to agricultural land and the wider farming estate.

4.18 KMT Farming and Consultancy Limited

Table 4-18 RR-2711

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
KMT-001	Landscape and Visual	Visual Impact and Landscape Character	Landscape and visual impact: The project would cause substantial, long-term harm to landscape character over 749 hectares in a sensitive location near the Cotswolds National Landscape. We consider compliance with Core Policy 51 ("*protect and enhance landscape character*") is impossible at this scale.	An assessment of landscape and visual effects are presented in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**. The Landscape and Visual Impact Assessment (LVIA) assesses effects on identified landscape and visual receptors, including residential properties, users of public rights of way and roads, and identifies where significant effects may occur. The LVIA found no significant long term visual effects to residential properties as a consequence of the Scheme. The visual effects of the Scheme are summarised in **ES Volume 3, Appendix 8-3-3 [APP-192]**. Temporary Major/Moderate and Moderate Adverse effects on visual receptors have been recorded across the Scheme during construction and at Year 1. However, for the majority of these receptors, the effects reduce to non –significant levels as a result of the embedded mitigation measures which are set out in Section 8.9 of **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]** and include landscape buffers, retention of existing hedgerows and woodland, and new planting to provide screening and integration over time. The assessment also identifies that there would be some long-term significant effects on the visual amenity of users of some localised footpaths, as a result of the Scheme. This predominantly relates to locations where footpaths diagonally cross fields and mitigation planting would be inappropriate to landscape character and the legacy landscape. Those receptors which would experience Significant Long Term Visual Effects are listed in Table 8-30 of the **LVIA [APP-060].** The scale of development within the Order Limits has been significantly reduced from the layout assessed in the Preliminary Environmental Information Report (PEIR) through an iterative design process undertaken in response to consultation and in accordance with the

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				mitigation hierarchy to avoid, reduce and mitigate adverse effects. As part of this design evolution, panels along the edge of the Cotswolds National Landscape and along the Fosse Way have been removed. Mitigation measures to address landscape and visual effects are set out in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**, **Figure 3-4-1 to 3-4-5.2 Landscape and Ecology Mitigation Plan [APP-084]** and secured within the **Outline Landscape and Ecological Mitigation Plan (LEMP) [APP-283]** and the **Outline Ecological Protection and Mitigation Strategy (EPMS) [APP-284]**. These documents include proposals for new and enhanced planting, retention of existing hedgerows and woodland, and landscape integration measures to reduce visual effects over time. In addition, the Scheme design incorporates minimum offsets from existing landscape features, including residential properties, ancient woodland, woodland, hedgerows, public rights of way and watercourses, to further limit visual impacts. Although these measures reduce the effects of the Scheme on nearly all receptors, as noted above there are 10 receptors which would experience Significant Visual Effects for the duration of the Scheme as set out Table 8-30 of the **LVIA [APP-060]**. Mitigation measures to address landscape and visual effects are set out in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**, **Figure 3-4-1 to 3-4-5.2 Landscape and Ecology Mitigation Plan [APP-084]**. The preparation, approval and implementation of detailed landscape and ecological management plans, substantially in accordance with the **OLEMP [APP-283]** and **EPMS [APP-284]**, are secured through requirements in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that the identified mitigation measures are delivered and maintained throughout the lifetime of the Scheme.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				The Applicant considers that although there are some short-term significant effects to the character of the landscape due to the change in land use caused by the infrastructure, there would also be permanent beneficial effects to the fabric of the land within the Order Limits as a result of the embedded mitigation measures which would contribute positively to the legacy landscape and be in line with Core Policy 51 and Wiltshire's Nature Recovery Strategy.
KMT-002	Ecology and Biodiversity	Ecological Surveys and Biodiversity Net Gain	Ecology and biodiversity: Surveys for key species and habitats are incomplete, particularly along the cable route corridor. We ask for a precautionary approach and enforceable commitments for biodiversity net gain and habitat protection.	The Applicant acknowledges that some areas within the Cable Route Corridor had not been subject to ecological survey at the point of finalising **the ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**. Since the preparation of the Chapter, habitat surveys have now been completed across all previously un-surveyed areas. The survey methodology applied was consistent with that reported in the **ES Volume 3, Appendix 9-1: Ecological Baseline Report [APP-198]** for the rest of the Cable Route Corridor. The results of these surveys have been reviewed and, in the Applicant's view, do not alter the conclusions of **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]** regarding likely significant effects. The precautionary assumptions previously applied in the ES were conservative and appropriately accounted for any uncertainty associated with un-surveyed areas. The Applicant has **updated ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]** and provided a revised version at Deadline 1 with the findings of these surveys, and it is considered these do not materially change the assessment of likely significant effects presented in the chapter. The scope of ecological and species-specific survey within the Cable Route Corridor was defined using a proportionate, risk-based approach. Survey scope and effort across the Order Limits were targeted to areas and features where there was a reasonable likelihood of significant effects, rather than applied uniformly across the Order Limits irrespective of risk.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				The assessment has had regard to the short-term, temporary and construction-phase nature of works within the Cable Route Corridor, the absence of permanent operational effects, and a robust appraisal of habitat suitability for species based on baseline habitats data collected through surveys. Based on this, a reduced survey effort within the Cable Route Corridor has been undertaken compared to the Solar PV Sites. Potential impacts within the Cable Route Corridor, including temporary habitat loss, disturbance and fragmentation, have been assessed on a precautionary reasonable worst-case basis. This assumes that construction works within the Cable Route Corridor will be progressive over the approximate 18-month construction period. Embedded mitigation and further controls secured through the **Outline EPMS [APP-284],** including pre-construction surveys and inspections, micro-siting of cabling works, appointment of an Ecological Clerk of Works and species-specific protection measures, where appropriate, provide a recognised mechanism for managing residual risk. Furthermore, reinstatement of any disturbed habitats will take place as a priority following construction within the Cable Route Corridor. The Scheme's baseline biodiversity units have been calculated with the use of the DEFRA published standardised Statutory Biodiversity Metric ('the Metric') and based on comprehensive habitat surveys undertaken by the Applicant's professional ecologists across the Order Limits, including the Cable Route Corridor. Details of the Scheme's approach to Biodiversity Net Gain (BNG) are provided in the **Biodiversity Net Gain Report [APP-273**] and the full BNG calculations are provided in a copy of the **Metric [APP-274],** and the calculations include habitats within the Cable Route Corridor. Whilst BNG for NSIPs such as the Scheme is not yet mandatory, the preparation, approval and implementation of the detailed Landscape and Ecological Management Plan,

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				substantially in accordance with the **Outline Landscape and Ecological Management Plan [APP-283]**, are secured through Requirement 7 in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that the identified habitat creation and enhancement measures will be delivered and maintained throughout the lifetime of the Scheme. Furthermore Requirement 9 of the **Draft Development Consent Order [APP-016]** specifically secures the provision of a minimum 10% Biodiversity Net Gain.
KMT-003	Climate Change and Energy Need	Carbon Emissions	Carbon and climate considerations: While the scheme could deliver net carbon savings over its lifetime, construction emissions mean carbon break-even would not occur until 2076.	It is not clear how the 2076 year of offset conclusion has been reached. **ES Volume 1, Chapter 7: Climate Change [APP-059]**, demonstrates that there is an overall net saving as a result of the Scheme on GHG emissions compared to a without-Scheme scenario.
KMT-004	Climate Change and Energy Need	Heritage Assets	Heritage and archaeology: Potential harm to heritage assets such as Bradfield Manor and Rodbourne Conservation Area has been under-assessed and archaeological mitigation strategies remain incomplete.	**ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, supported by **ES Volume 3, Appendix 12.1: Heritage Statement [APP-219]**, has assessed the potential impact of the Scheme on built heritage assets, and where required appropriate mitigation has been proposed (see Section 12.9 of **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]** for embedded mitigation). Site visits were undertaken with Historic England on the 28th March 2025 and the Wiltshire County Council Conservation Officer on the 11th April 2025, which included visiting land adjacent to Grade I Listed Bradfield Manor Farmhouse and Rodbourne Conservation Area. A second site visit with Historic England was undertaken in the grounds of Bradfield Manor Farmhouse on the 22nd of May 2025 (see table 12-2 in **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**). Feedback provided during the site visits was used to inform the Scheme design and assessment provided in **ES Volume 1, Chapter 12: Cultural Heritage [APP-064].**

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				As stated in **ES Volume 3, Appendix 12.1: Heritage Statement [APP-219]** when considering the contribution of setting to the significance of the Grade I Listed Bradfield Manor Farmhouse (NHLE: 1198808), the asset is largely defined and experienced from within the Bradfield Manor Farmhouse grounds, in particular the walled courtyard to the south-west of the asset, where the full architectural interest of its south-facing primary elevation can be appreciated. Lime Down D is located within agricultural land to the north of asset. Following advise provided by Historic England panels in Field D5 were set back away from Grade I Listed Bradfield Manor Farmhouse and enhanced screening is proposed along existing hedgerows. Views of the proposed BESS and 400 kV Substation from Bradfield Manor Farmhouse will be largely mitigated by the proposed new woodland belt along the south-eastern boundary of Field D3 which, in combination with the existing woodland block west of D1 and south of D22, provides extensive screening in views to and from Bradfield Manor Farmhouse. It was identified that there would be a moderate / minor (not significant) adverse effect to the asset (less than substantial harm at the lower end in NPPF terms) as a result of indirect (i.e. setting) impacts. With consideration to Rodbourne Conservation Area, embedded mitigation including the removal of Fields E5 and E8 from the Scheme Order Limits, removal of panels from Fields E7, E9 and E10, offsets to the PROW and enhanced screening of existing hedgerows are considered sufficient mitigation to remove any adverse impacts to the Conservation Area. As stated in Section 3.7 of the **Outline Construction Environmental Management Plan [APP-277]**, construction traffic routes have been identified to avoid large increases in HGV movements near to heritage assets. Highway improvement works would cause at most temporary construction effects and would not result in harm to the Conservation Area's significance. Therefore, a neutral effect

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				was identified as a result of the Scheme to the Conservation Area. Photomontages produced as part of the **LVIA [APP-103 to APP-104]** were used to inform **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, supported by **ES Volume 3, Appendix 12.1: Heritage Statement [APP-219],** include both summer and winter photography and as such show seasonal screening differences. Additional Heritage viewpoints were used to inform the assessment, a list of these is provided in Annex E of **Appendix 12.1: Heritage Statement [APP-219].** The Applicant considers that this assessment approach is robust and appropriate. The **Outline Landscape and Ecological Management Plan [APP-227]**, sets out a framework for the planting, management and monitoring of landscaping mitigation, which is proposed as part of embedded mitigation for built heritage assets. Archaeological mitigation has been addressed through **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, supported by **ES Volume 3, Appendix 12.6 Outline Archaeological Mitigation Strategy [APP-230]**. The Outline AMS sets out a proportionate, staged approach to archaeological mitigation, including preservation in situ and Strip, Map and Record, where required, informed by the sensitivity of different areas of the Scheme. The use of an OAMS is appropriate at this stage, prior to detailed design, as it provides a secured framework for mitigation while allowing flexibility to respond to final construction parameters. The OAMS is secured through Requirement 12 of the draft DCO. SSWSIs will be prepared and appended to the OAMS to refine mitigation measures, in

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				agreement with WCAS, following confirmation of detailed design.
KMT-005	Transport and Access	Traffic Mitigation	Highways and transport: Concerns include inadequate mitigation for HGV movements on narrow rural roads and insufficient commitments for passing places. We also believe there insufficient control over the works on the public highway.	The assessment presented in Annex H of **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]** demonstrates adequate carriageway width or frequency of passing place opportunity to pass at least an HGV and a light vehicle along construction routes. This confirms that no passing bay or widening improvements are needed to accommodate these movements along construction routes outside of the Order Limits. The distances between passing points outside of the Order Limits are all within 150 m with forward visibility extending to the next passing point and beyond. This is within the generally accepted distance of 200 m. To provide further comfort, additional information will be added to **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]** and that document will be resubmitted at Deadline 1 of Examination to demonstrate that there is adequate carriageway width and/or passing place opportunity for two HGVs when accessing Lime Down Site D. The Applicant considers that these are appropriate and adequate commitments for passing places and requirements. An **OCTMP [APP-287]** supports the DCO Application and includes outline measures to minimise transport and access impacts as far as practicable. This includes road condition surveys to ensure any damage to the highway network caused by construction traffic is identified and rectified, management of construction deliveries to avoid the requirement for HGVs generated by the Scheme passing each other in opposite directions on the local roads, and restricted hours of deliveries outside of peak hours. A final CTMP would be prepared post consent and must be substantially in accordance with the **OCTMP [APP-287]** and

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				approved by the relevant local planning authority (in consultation with the relevant highway authority and South Gloucestershire Council), as secured by Requirement 15 in Schedule 2 of the **Draft DCO [APP-016]**. The Applicant considers that this provides appropriate and proportionate mitigation for HGV movements. The powers to undertake works on the public highway are contained within the DCO providing control over works in the highway. The details of these works, including traffic management and programme, will be agreed at the Technical Approval/detailed design stage and is a requirement of the DCO. Clarity on whether an access is temporary, permanent of semi-permanent is provided in Table 13-19 and Table 13-32 in **ES Volume 1, Chapter 13: Transport and Access [APP-065]**. Details as to the location of the construction compounds are provided in the **Land Plans [APP-006]** and **Works Plans [APP-007]** under Works Number 5A(v). They are located outside of the Highways extent and will be cited in those locations temporarily for the purpose of construction. All works in private land will be reinstated following completion of the works. Details relating to how the construction areas will be accessed are provided in **ES Volume 1, Chapter 13.10.63 [APP-065]**. The design of the access and egress from the highways will be completed in conjunction with the local highway as set out within the **Outline Construction Traffic Management Plan [APP-287]**.
KMT-006	Socio-Economics, Tourism and Recreation	Agricultural and Tourism Jobs	Economic and community impact: The scheme risks the loss of agricultural and tourism jobs, removal of 878 hectares of land from food production, as well as adverse	The Applicant confirms that land agreements are being made with landowners who have their own contractual arrangements with tenant farmers. The Applicant understands that these arrangements may involve the termination of agricultural tenancies at the discretion of the landowner.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			effects on local businesses and communities.	The Applicant is cognisant of the potential impact this may have and seeks to retain agricultural workers where possible, provide reskilling opportunities, or supporting re-employment, as secured through the **Outline Skills, Supply Chain and Employment Plan [APP-285]** and Requirement 18 in Schedule 2 of the **Draft DCO [APP-016]**. The potential effects of the Scheme on tourism and recreation are assessed in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]**, supported by **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]**. This assessment considers baseline tourism activity, visitor attractions, recreational assets, tourism-dependent businesses, and whether changes to landscape character or visual amenity could influence visitor behaviour. The assessment identifies a worst-case scenario in which a temporary loss of up to 50 tourism-related jobs could occur locally during construction, and a long-term loss of up to 11 tourism-related jobs during operation. This is a precautionary estimate based on conservative assumptions. The assessment concludes that, while some localised effects on tourism receptors are anticipated, significant adverse effects on the wider tourism economy are not anticipated. These findings are fully reported in the ES and will be weighed in the planning balance alongside the Scheme's wider economic and environmental benefits. The Applicant is discussing the approach to assessing tourism impacts with Wiltshire Council's Economic and Regeneration Team and this discussion is set out in the Statement of Common Ground with Wiltshire Council to be submitted at Deadline 1. The likely effects of the Scheme on the local economy and employment are also assessed in **ES Volume 1, Chapter 16: Socio-economics, Tourism and Recreation [APP-068]**, with supporting evidence in **ES Volume 3, Appendix**

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				16-3: Socio-Economics, Tourism and Recreation – Summary of Non-Significant Effects [APP-242]. This assessment considers construction and engineering sectors, agricultural activity, tourism-related businesses, and wider local economic conditions across construction, operation and decommissioning. The assessment concludes that effects on the local economy are negligible to minor beneficial, with construction expenditure and employment generating positive, temporary effects. It concludes that the Scheme would not result in significant adverse effects on local businesses or the wider local economy, and that socio-economic benefits, including job creation and local supply chain opportunities, are expected during construction, with more modest economic, skills and supply chain opportunities during operation. The approach to assessing socio-economic effects has been agreed with Wiltshire Council's Economic and Regeneration Team, with the exception of matters relating to agricultural employment, which the Applicant is discussing with the Team as recorded in the Statement of Common Ground with Wiltshire Council to be submitted at Deadline 1. The potential effects of the Scheme on agricultural land are assessed in **ES Volume 1, Chapter 17: Soils and Agriculture [APP-069]**, which considers baseline agricultural land use and quality and evaluates likely effects during construction, operation and decommissioning. The assessment confirms that the Scheme will result in a temporary and reversible loss of agricultural land during the operational period. The assessment identifies that land would be removed from arable rotation for the operational life of the Scheme, anticipated to be approximately 60 years, but that, although the primary agricultural use would cease during this period, the soil and land resource would be retained and would continue to fulfil ecological functions. Reduced

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				disturbance during operation allows soils to recover from previous intensive agricultural use, with benefits to soil structure and soil biology over time. All land is to be returned to its original use and condition as far as practicable following decommissioning. No permanent loss of agricultural land is anticipated.
KMT-007	Landscape and Visual	Landscape Character	Landscape and visual impact: The project would cause substantial, long-term harm to landscape character over 749 hectares in a sensitive location near the Cotswolds National Landscape. We consider compliance with Core Policy 51 ("*protect and enhance landscape character*") is impossible at this scale.	It is recognised that the Scheme is within the setting of the Cotswolds National Landscape (CNL) . Although there are no direct impacts on the CNL, the effects of the Scheme are fully assessed as a standalone receptor within **ES Volume 3, Appendix 8.6: Assessment of Effects on the Special Qualities of the Cotswolds National Landscape [APP-197]**. This assessment considers the effects of the Scheme on landscape character, visual amenity and the special qualities of the CNL, including tranquillity. The assessment found that there would be some short term harm to landscape character within the setting of the CNL but due to the avoidance measures embedded within the Scheme, harm to the CNL itself would be minimal with beneficial effects in the long term which would further the purposes of the designation. In respect of visual amenity, some short-term adverse effects would be experienced by a small number of visual receptors with views to and from the CNL. However, these would reduce over time as a result of the proposed mitigation. The assessment of effects on the special qualities of the CNL scoped out 3 SQs as there is no association with the Site. The assessment found that there are no direct effects on the remaining SQs. There are some Minor/ Negligible short-term effects on a small number of visual receptors within the setting of the CNL which effect SQ7 -Tranquillity and SQ13 Archaeology and historic associations. However, these effects are mitigated by Year 15 when proposed vegetation has matured. The assessment also found that there would be beneficial effects on SQ 6 – Biodiversity and nature recovery as a result of the delivery of approximately 119.7 hectares of flower-rich neutral grassland

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				(as defined in the BNG assessment) and SQ 12 - An accessible landscape as a result of the delivery of approximately 12.8km of new permissive paths within the setting of the CNL. The remaining SQs would remain entirely intact. The Scheme was refined through an iterative design process, to avoid and reduce effects on the CNL and its setting. Panels along the edge of the CNL were removed from the Order Limits in fields C2, C3 and C4 where significant visual effects on receptors within the CNL were identified. Panels were also removed from fields C1, C6, C8, the western section of C9 and the majority of C10, with this land now proposed for ecological mitigation to protect the setting of the CNL. In addition, panels within fields A11 and A12 were removed and the land repurposed for ecological mitigation to protect the setting of the CNL towards Sherston. All land parcels adjacent to the CNL are proposed to deliver habitat enhancement, as shown in the **Work Plans [APP-007]**, informed by the CNL Management Plan and the Cotswolds National Landscape Strategy and Guidelines, to further the purposes of the designation. Details of the proposed landscape and ecological mitigation and enhancement measures are provided in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**, Figure 3-4-1 to 3-4-5.2 **Landscape and Ecology Mitigation Plan [APP-084]** and the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]**, and the **Outline Ecological Protection and Mitigation Strategy (EPMS) [APP-284]**. The preparation, approval and implementation of the detailed Landscape and Ecological Management Plan, substantially in accordance with the **OLEMP [APP-283]**, are secured through Requirement 7 in Schedule 2 of the **Draft Development Consent Order [APP-016]**. The preparation,

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				approval and implementation of the detailed Ecological Protection and Mitigation Strategy, substantially in accordance with the **EPMS [APP-284]**, are secured through Requirement 8 in Schedule 2 of the **Draft Development Consent Order [APP-016]**. These requirements ensure that the identified mitigation and enhancement measures are delivered and maintained throughout the lifetime of the Scheme. The Applicant considers that although there are some short-term significant effects to the character of the landscape due to the change in land use caused by the infrastructure, there would also be permanent beneficial effects to the fabric of the Site as a result of the embedded mitigation measures which would contribute positively to the legacy landscape and be in line with Core Policy 51 and Wiltshire's Nature Recovery Strategy.
KMT-008	Climate Change and Energy Need	Carbon Emissions	Carbon and climate considerations: While the scheme could deliver net carbon savings over its lifetime, construction emissions mean carbon break-even would not occur until 2076.	**ES Volume 1, Chapter 7: Climate Change [APP-059]** assesses greenhouse gas (GHG) emissions across the full life cycle of the Scheme, including the manufacture, transport, installation, operation, maintenance and decommissioning of Scheme components. This assessment includes embodied carbon associated with materials and components, as well as operational emissions savings arising from renewable electricity generation. The assessment concludes that, while emissions are associated with the manufacture and construction of the Scheme, these are outweighed over time by the carbon savings achieved through the displacement of fossil fuel-derived electricity generation. The carbon payback period occurs within the operational lifetime of the Scheme and substantially earlier than 2076. When considered over its operational lifetime, the Scheme would result in a net reduction in GHG emissions compared to a 'without Scheme' scenario and would make a meaningful contribution to the

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				UK's legally binding carbon budgets and transition to net zero.
KMT-009	Cultural Heritage	Heritage Assets	Heritage and archaeology: Potential harm to heritage assets such as Bradfield Manor and Rodbourne Conservation Area has been under-assessed and archaeological mitigation strategies remain incomplete.	**ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, supported by **Volume 3, Appendix 12.1: Heritage Statement [APP-219]**, assessed the potential impacts of the Scheme on Rodbourne Conservation Area and the Grade I Listed Bradfield Manor Farmhouse (NHLE: 1198808). With consideration to Rodbourne Conservation Area, embedded mitigation secured through Requirement 12 of the DCO including the removal of Fields E5 and E8 from the Scheme Order Limits, removal of panels from Fields E7, E9 and E10, offsets to the PROW and enhanced screening of existing hedgerows are considered sufficient mitigation to remove any adverse impacts to the Conservation Area. Therefore, no impact was identified as a result of the Scheme to the Conservation Area. As stated in **Appendix 12.1: Heritage Statement [APP-219]** when considering the contribution of setting to the significance of Bradfield Manor Farmhouse, the asset is largely defined and experienced from within the Bradfield Manor Farmhouse grounds, in particular the walled courtyard to the south-west of the asset, where the full architectural interest of its south-facing primary elevation can be appreciated. Lime Down D is located within agricultural land to the north of asset. Following advice provided by Historic England, panels in Field D5 were set back away from Grade I Listed Bradfield Manor Farmhouse and enhanced screening is proposed along existing hedgerows. Views of the proposed BESS and 400 kV Substation from Bradfield Manor Farmhouse will be largely mitigated by the proposed new woodland belt along the south-eastern boundary of Field D3 which, in combination with the existing woodland block west of D1 and south of D22, provides extensive screening in views to and from Bradfield Manor Farmhouse. It was identified that there would be a moderate / minor (not significant) adverse effect to the asset (less than

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				substantial harm at the lower end in NPPF terms) as a result of indirect (i.e. setting) impacts.
KMT-010	Transport and Access	Traffic Mitigation	Highways and transport: Concerns include inadequate mitigation for HGV movements on narrow rural roads and insufficient commitments for passing places. We also believe there insufficient control over the works on the public highway.	The capacity of local roads and infrastructure to accommodate construction vehicles is assessed in **ES Volume 1, Chapter 13: Transport and Access [APP-065]**, which considers construction traffic volumes, vehicle types, route suitability and network performance. The assessment concludes that, with appropriate mitigation in place, there would be no significant adverse impacts on the local highway network. Supporting technical information is provided in **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]**, which identifies specific locations where traffic management measures or passing arrangements may be required on narrower sections of construction routes. The assessment presented in Annex H of **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]** demonstrates adequate carriageway width or frequency of passing place opportunity to pass at least an HGV and a light vehicle as requested in comments provided by Wiltshire Council. All construction routes also include passing points to allow two HGVs to pass. Mitigation measures to manage construction traffic are set out in the **Outline Construction Traffic Management Plan (CTMP) [APP-287]** . The CTMP is designed to minimise the effects of construction traffic on local roads and includes measures for vehicle routing, delivery scheduling and liaison with the local highway authority. The preparation, approval and implementation of the final CTMP, substantially in accordance with the outline CTMP, are secured through Requirement 15 of Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				construction traffic impacts on local roads and infrastructure are appropriately managed throughout the construction phase of the Scheme.
KMT-011	Socio-Economics, Tourism and Recreation	Agricultural and Tourism Jobs	Economic and community impact: The scheme risks the loss of agricultural and tourism jobs, removal of 878 hectares of land from food production, as well as adverse effects on local businesses and communities.	The Applicant confirms that land agreements are being made with landowners who have their own contractual arrangements with tenant farmers. This may, therefore, involve the termination of agricultural tenancies at the discretion of the landowner. The Applicant is, however, cognisant of the impact this may have and so seeks to source ways of retaining agricultural workers, providing reskilling opportunities, or providing re-employment opportunities as secured in the **Outline Skills, Supply Chain and Employment Plan [APP-285].** The potential effects of the Scheme on tourism and recreation are assessed in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]**, supported by **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]**. The assessment considers baseline tourism activity, visitor attractions, recreational assets and tourism-dependent businesses within the study area. The assessment evaluates potential effects on the use, enjoyment and desirability of nearby tourism destinations, including impacts on individual visitor attractions, recreational routes, events and businesses reliant on tourism. It also considers whether changes to landscape character or visual amenity could influence visitor behaviour. The assessment identifies a worst-case scenario in which a temporary loss of up to 50 tourism-related jobs could occur locally during construction, and a long-term loss of up to 11 tourism-related jobs could occur during the operational phase of the Scheme. This represents a precautionary estimate

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				based on conservative assumptions. The assessment concludes that, while some localised effects on tourism receptors are anticipated to occur, significant adverse effects on the wider tourism economy are not anticipated. These findings are fully reported in the ES and will be weighed in the planning balance alongside the Scheme's wider economic and environmental benefits. The Applicant is discussing the approach to assessment of tourism impacts with Wiltshire Council's Economic and Regeneration Team and those discussions will be set out in the Statement of Common Ground to be submitted at Deadline 1.**]** An assessment of the likely effects of the Scheme on the local economy and employment is provided in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]**. This chapter considers potential impacts on construction and engineering sectors, agricultural activity, tourism-related businesses, and wider local economic conditions during construction, operation and decommissioning. Supporting evidence is provided in **ES Volume 3, Appendix 16-3: Socio-Economics, Tourism and Recreation – Summary of Non-Significant Effects [APP-242]**, which summarises that effects on the local economy and economic prosperity are assessed as negligible to minor beneficial, with construction expenditure and employment generation contributing positive, temporary effects on local economic activity. The assessment therefore concludes that the Scheme would not result in significant adverse effects on local businesses or the wider local economy, and that socio-economic benefits, including job creation and local supply-chain opportunities, are expected during the construction phase, with more

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				modest economic and skills and supply chain opportunities during the operational phase. The Applicant notes that the approach to assessment of socio-economic effects has been agreed with Wiltshire Council's Economic and Regeneration Team, with the exception of matters relating to agricultural employment, which the Applicant is still discussing with the team. This is set out in the Statement of Common Ground with Wiltshire Council to be submitted at Deadline 1. The potential effects of the Scheme on agricultural land are assessed in **ES Volume 1, Chapter 17: Soils and Agriculture [APP-069]**, which considers baseline agricultural land use and quality and evaluates likely effects during construction, operation and decommissioning. The assessment confirms that the Scheme will result in a temporary and reversible loss of agricultural land during the operational period, with all land to be returned to its original use and condition as far as practicable following decommissioning. No permanent loss of agricultural land is anticipated. The Applicant does not consider that food security will be compromised by the Scheme (or solar energy more widely). The latest figures to September 2024 indicate that solar occupied around 21,200 ha of agricultural land in the UK. In 2025, 545,000 ha of arable land in England were left uncropped (source: Department for Environment, Food & Rural Affairs, Agricultural land use in England at 1 June 2025).It should also be noted that food security is not identified as an issue within the suite of Energy National Policy Statements or the National Planning Policy Framework (NPPF). Further, the Government's UK Solar Roadmap (2024) states that solar development is not considered to compromise food security, and that climate change itself poses the greatest

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				long-term risk to food production - a risk which the Scheme directly helps to address by providing a secure, low-carbon source of electricity. Post-decommissioning of the Scheme, the landowners would choose how the land is to be used and managed; the landowner may return all of the land to arable use, although it is likely that established habitats such as hedgerows and woodland would be retained given their potential benefits to agricultural land and the wider farming estate. Whilst there is an environmental and economic cost to importing food, and it is recognised the UK imports a far greater amount of food than it exports, the impact of the Scheme on food import requirements or the food and drinks economy is not material at a national scale and has therefore not been assessed.

4.19 W H P Renovations Ltd

Table 4-19 RR-4880

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
WHPR-001	Transport and Access	Road Infrastructure	W H P Renovations Ltd undertake many property renovations in and around the proposed site area. The solar farm would have the following effects on our business: 1, the roads in the area are predominantly narrow, winding, often single lane and often severely potholed. Many years of construction traffic would put an intolerable pressure on this fragile infrastructure, having a knock on effect on our journey times and ease of access to many sites.	The Applicant has assessed the likely impacts of construction traffic movements on the local highway network in **ES Volume 1 Chapter 13: Transport and Access [APP-065]** and finds there are no significant adverse effects to driver delay or highway safety, subject to implementation of the **OCTMP [APP-287]**, secured by Requirement 15 in Schedule 2 to the **Draft DCO [APP-016]**. As no significant effects to travelling on the local highway network is anticipated, no subsequent significant effect on business users of the highway network is expected.
WHPR-002	Socio-Economics, Tourism and Recreation	Property Values	2, If this area of the Southern Cotswolds were to become blighted by solar panels I believe property values in the area would be depressed and transactions stagnate. Our business is reliant on a buoyant property market and confident property owners wishing to invest in their properties, not worrying about falling values.	Impacts of the Scheme on property prices have not been assessed as these have been agreed by the Planning Inspectorate to be scoped out of assessment in the ES, as set out in **ES Volume 3, Appendix 1-2: Scoping Opinion Response Table [APP-181].** As a result, other impacts on the local property market have not been assessed either. Notwithstanding, the Applicant has sought to minimise impacts upon residential properties and residential amenity through the mitigation measures secured by requirements in Schedule 2 to the **Draft DCO [APP-016]**. The Applicant has also assessed likely impacts on community and social wellbeing, and on the impacts of the Scheme on sense of community and sense of place (under then assessment category 'community identity, culture, resilience and influence') in **ES Volume 1 Chapter 18: Human Health [APP-070]**. The assessment concludes that there are no significant adverse effects anticipated to population and community or social health and wellbeing.
WHPR-003	Site Selection and Alternatives	Rooftop Solar	3, Working within the property industry I find it bizarre that it isn't a stipulation of residential	An assessment of the potential effects of the Scheme on soils and agricultural land is provided in **ES Volume 1, Chapter 17: Soils and Agriculture [APP-069]**. This chapter

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
	Soils and Agriculture		development planning that every property should have roof top panels. Why on farmland not rooves, both residential and commercial.	considers baseline agricultural land quality, including Best and Most Versatile (BMV) land, and assesses likely significant effects (see conclusions below) arising from construction, operation and decommissioning of the Scheme, together with embedded mitigation measures. The areas of each Agricultural Land Classification (ALC) grade affected by the Scheme are set out in ES Chapter 17, Section 17.7. Of the agricultural land within the Solar PV Sites, approximately 477.4 hectares (around 67%) is classified as Subgrade 3b or Grade 4 and is therefore not BMV land. There is no Grade 1 land, around 30.8 hectares (approximately 4%) of Grade 2 land, and approximately 209.3 hectares (around 29%) of Subgrade 3a land. The distribution of ALC grades is shown in **ES Volume 2, Figure 17-2: Agricultural Land Classification Mapping [APP-172]**. The Applicant has had regard to agricultural land quality in the design and site selection process and has sought, where practicable, to locate infrastructure on lower quality land. The Scheme will result in a temporary but long-term and reversible loss of agricultural land for the operational life of the Scheme. As set out in ES Chapter 17, Section 17.10, this gives rise to a temporary, long-term moderate adverse effect on agricultural land overall, and a temporary, long-term major/moderate adverse effect on BMV land, both of which are assessed as significant. These effects are fully reported in the ES and are a matter for the Secretary of State to weigh in the planning balance against the need for the Scheme and its wider benefits. There are no significant permanent effects on agricultural land, as all land will be returned to its original use and condition as far as practicable following decommissioning.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				The Applicant notes that the approach to assessing the quality of the agricultural land is under further discussion with Natural England and is set out in the relevant Statement of Common Ground to be submitted at Deadline 1. Measures to avoid and minimise effects on soils and agricultural land are embedded within the Scheme design and secured through the DCO. These include the preparation and implementation of a **Soil Resources Management Plan (SRMP) [APP-280]**, which will control soil handling, storage and reinstatement during construction, operation and decommissioning, and a requirement to prepare and implement a Decommissioning Strategy in accordance with the **Outline Decommissioning Strategy [APP-279]**. Through the establishment and maintenance of long-term grassland beneath and between the solar arrays, soil health, quality and structure are anticipated to improve over the lifetime of the Scheme, resulting in a temporary, moderate beneficial effect on soil resources at decommissioning, which is assessed as significant (ES Chapter 17, Sections 17.10 and 17.12). In relation to suggestions that brownfield land or alternative locations should be used, including rooftop, these matters are addressed in **ES Volume 1, Chapter 4: Alternatives and Design Evolution and in the Statement of Need [APP-056 and APP-266]**. The Applicant has considered alternatives, including previously developed land and other forms of solar deployment, as part of the site selection and design evolution process. As shown in Table 2-2 of **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]**, the Applicant has considered previously developed land/brownfield land over 1 hectare within the

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				area of search, based on the brownfield land registers of the relevant Local Planning Authorities, and concluded that none of the sites are large enough to provide a viable land parcel of at least 40 ha and sites were not considered to be available as they have planning permission for residential development and/or are allocated for residential/mixed use development. National policy and government guidance, as set out in the **Statement of Need [APP-266]**, recognise that while rooftop and smaller-scale solar installations are an important part of the energy mix, they cannot alone meet the scale of capacity required to achieve clean power and net zero objectives. Large-scale ground-mounted solar therefore remains necessary in addition to, not instead of, rooftop solar.

4.20 Wildnature Rites of Passage CIC

Table 4-20 RR-4897

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
WRPCIC-001	Description and DCO Process	Introduction	I am registering to participate in the examination because the proposed development would have a direct and significant impact on my day-to-day life, my work, and a community interest company (CIC) that I run, which operates in woodland close to the proposed site near Foxley. I am a director of Wildnature Rites of Passage, a Community Interest Company that delivers rites of passage camps for under-privileged teenage boys. These camps take place in woodland close to the proposed development area and rely fundamentally on quiet, intact natural environments, dark skies, wildlife presence, and a sense of remoteness and immersion in nature.	The Applicant has sought to minimise environmental effects to the Scheme in relation to noise, visual impacts, and ecology, and has set out specific mitigation measures to minimise effects from the Scheme's construction in the **OCEMP [APP-277]**. These measures are secured by the Requirements in Schedule 2 to the **Draft DCO [APP-016]**. The location of the Wildnature Rites of Passage campsite has not been made publicly available, and as such, the Applicant cannot make location specific comments. That notwithstanding, the Applicant confirms Lime Down B is the closest of the Solar PV Sites to the village of Foxley, and following comments have been made on that basis of impacts on Foxley village in a generalised sense.
WRPCIC-002	Human Health	Impact on Mental Health and Wellbeing	Impact on wellbeing, mental health and vulnerable young people The camps are designed specifically to support boys who are often struggling with: - anxiety and poor mental health, - lack of stable male role models, - disconnection from education and society, - limited access to safe green spaces. A core element of the programme is	The Applicant is confident that the mitigation measures set out for construction and during the operational lifetime of the Scheme, as secured through the relevant requirements in Schedule 2 to the **Draft DCO [APP-016]** are sufficient to ensure no significant adverse effects occur to the business or community service operated by Wildnature Rites of Passage CIC. Population-scale assessments of impacts to socio-economic conditions and human health and wellbeing are set out in **ES Volume 1 Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** and **ES Volume 1 Chapter 18: Human Health [APP-070]** respectively. Neither assessment finds significant adverse effects to people's lives and livelihoods as a result of the Scheme.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			deep nature connection, including silence, night-time experiences, wildlife awareness, and mentoring activities that depend on an undisturbed natural setting. The proposed development would materially affect this by: - introducing visual intrusion into a currently rural and natural setting, - increasing background noise (including construction activity and long-term operational noise), - reducing perceived safety and seclusion, - altering wildlife behaviour and presence, - increasing light pollution at night. These impacts would undermine the therapeutic and developmental value of the camps and reduce their effectiveness for vulnerable young people who already have limited opportunities.	The Scheme's impacts on wildlife are assessed in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061**], which considers impacts on habitats and species during construction, operation and decommissioning and identifies measures to avoid or mitigate barriers to wildlife movement. The assessment identifies embedded and additional mitigation measures and concludes that, with these measures in place, no unacceptable significant adverse effects on wildlife are anticipated. This is further discussed below.
WRPCIC-003	Landscape and Visual	Impact on Landscape Characer	Loss of quiet, dark, and natural character essential to the camps The woodland location near Foxley is chosen deliberately because it provides: - quiet away from roads and development, - dark skies and low artificial	Sound propagation from the Scheme has been modelled under the reasonable worst-case of moderate downwind conditions and, as evidenced by **Figure 14-2 Daytime Operational Noise Contours [APP-160],** Figure 14-3 **Night-time Operational Noise Contours [APP-161]** and Tables 8 and 9 in **Appendix 14-4 Noise Modelling [APP-237],** levels in the area near Foxley would be below the existing background

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			lighting, - intact habitats where wildlife is present and observable, - a sense of continuity with nature that is increasingly rare. These qualities are not incidental; they are central to the programme's outcomes. The proposed development would fundamentally change the character of the area, even if located some distance away, because: - sound carries widely across open countryside, - night-time lighting affects large areas beyond the site boundary, - perceptions of enclosure and remoteness are easily lost, - cumulative change erodes the sense of being in nature This would directly affect my ability to run the camps as they are currently designed.	sound. As such the quiet character of the area would not be impacted by the Scheme. With reference to operational lighting: Lighting is not required within the Solar Arrays for the operational phase. Motion sensing security lighting will be provided within substations and within the BESS to be used only for maintenance and security purposes. Standard good practice measures would be employed to minimise light spill, including glare during construction, operation and decommissioning. Refer to section 3.5.12 in Chapter 3 of the **ES: The Scheme [APP-055]** for more information on operational lighting. The **LVIA [APP-060]** robustly assesses both the landscape and visual effects of the Scheme independently to ensure both the impacts and effects on the fabric and character of the landscape are taken into account as well as the views and visibility. Potential impacts on ecology and biodiversity are fully assessed in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**. The assessment identifies embedded and additional mitigation measures and concludes that, with these measures in place, no unacceptable significant adverse effects on ecology and biodiversity are anticipated. Mitigation measures set out in the assessment are proposed to safeguard habitats and species, and avoid disturbance and displacement of wildlife. These include protective buffers around important habitats (such as woodlands, hedgerows and ponds), species-specific mitigation, and pollution prevention controls which will be secured via the **Outline Ecological Protection and Mitigation Strategy (EPMS) [APP-284]** The Scheme will create and enhance a range of habitats, such as woodlands, hedgerows and ponds, that will benefit a wide range of wildlife present in the area, as well as strengthen connective links to habitats within the Scheme and in the wider

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				landscape. A comprehensive package of habitat creation and enhancement measures are shown in **ES Volume 2, Figure 3-4: Landscape and Ecological Mitigation Plan [APP-084]** and detailed in the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283**].
WRPCIC-004	Socio-Economic, Tourism and Recreation	Impact on Livelihoods	Impact on my day-to-day work and livelihood My day-to-day life involves: - preparing and running camps on site, - working outdoors with groups of young people, - facilitating activities that depend on calm, natural surroundings, - managing safeguarding and emotional wellbeing in a controlled, peaceful environment. The proposed development would introduce unpredictable disturbances (construction phases, traffic, visual change) that would: - disrupt programme delivery, - require changes to safeguarding and risk management, - potentially make the location unsuitable for certain activities, - reduce demand for the camps from referring organisations. This represents a direct impact on my work and the viability of a community service, not an abstract concern.	The Applicant is confident that the mitigation measures set out for construction and during the operational lifetime of the Scheme, as secured through the relevant requirements in Schedule 2 to the **Draft DCO [APP-016]** are sufficient to ensure no significant adverse effects occur to the business or community service operated by Wildnature Rites of Passage CIC. Impacts on an individuals livelihood have not been assessed as this is disproportionate to assessment of the Scheme. That notwithstanding, population-scale assessments of impacts to socio-economic conditions and human health and wellbeing are set out in **ES Volume 1 Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** and **ES Volume 1 Chapter 18: Human Health [APP-070]** respectively. Neither assessment finds significant adverse effects to people's lives and livelihoods as a result of the Scheme.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
WRPCIC-005	Cumulative and In-Combination Effects	Other Proposed Developments in the Vicinity	Cumulative impact with other proposed development The proposed development must also be considered in combination with: - nearby housing growth, - increased traffic and infrastructure pressure, - other land-use changes in the are. Individually, developments may be presented as limited in impact, but cumulatively they risk the gradual loss of the very landscapes that support wellbeing, biodiversity and community-based initiatives like ours. There is currently no clear assessment of how cumulative landscape, noise, lighting and ecological impacts affect non-statutory but socially valuable uses of the countryside, such as outdoor education, mentoring and nature-based wellbeing services.	Cumulative assessment is a key and important part of the DCO submission. A comprehensive Cumulative and In-Combination Effects Assessment has been undertaken in accordance with Planning Inspectorate Advice Note 17 and the relevant NPS EN-1, NPS EN-3 and NPS EN-5 requirements which are set out within **ES Volume 1, Chapter 21 [APP-074]** and associated Appendices **[APP-264]**. Interaction with proposed or consented but not yet built developments has been fully explored within each of the technical assessments **[APP-059 - APP-072]** with a summary of each of these assessments provided within **Environmental Statement Chapter 21 In-Combination and Cumulative Effects [APP-073]**. Existing schemes are captured within the baseline environment. The four stage cumulative assessment methodology is described within **ES Volume 1, Chapter 6 EIA Methodology [APP-058]**. 358 developments were included in the Long List **[APP-264]**. 41 developments are included in the short list (and are therefore assessed) including a number of proposed solar and BESS developments. The list of developments included in the cumulative assessment was reviewed and developed in consultation with Wiltshire Council. Taking a conservative worse case approach, significant cumulative effects are identified at a limited and discrete number of receptors comprising tourism and recreation impacts during the construction phase on Corsham Park, PRoW WT|CORM|122, long path and Sustrans Cycle Route 403, and on skylark at a District level.
WRPCIC-006	Landscape and Visual	Impact on Landscape	Planning balance and public interest While I recognise the importance of	The Applicant is confident that the assessment of socio-economic effects in **ES Volume 1 Chapter 16: Socio-**

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
	Socio-Economics, Tourism and Recreation	and Local Community	renewable energy and infrastructure, I believe the planning balance must also consider: - the social value of quiet rural landscapes, - the role of nature-based programmes in supporting vulnerable young people, - the increasing scarcity of places where deep nature connection is possible, - the loss of community-led, preventative wellbeing initiatives if such environments are degraded. Once the character of this landscape is changed, it cannot realistically be restored for these purposes.	**Economics, Tourism and Recreation [APP-068]** and to human health and wellbeing in **ES Volume 1 Chapter 18: Human Health [APP-070]** robustly and proportionately set out the likely significance of effects on people as a result of the Scheme. The Applicant is therefore confident that this means there are no significant adverse effects anticipated to the users or operators of Wildnature Rites of Passage CIC. The Scheme provides extensive mitigation and management measures to protect the character of the quiet rural landscape which are embedded within the Scheme. This includes general offsets / buffers to infrastucture, new tree, hedgerow and woodland planting, new wildflower meadows and margins, and riparian corridors within the Scheme as set out in Section 8.9 of the LVIA in **ES Volume 1, Chapter 8: Landscape and Visual Impact [APP-060].**
WRPCIC-07	Socio-Economic, Tourism and Recreation	Conclusion	Conclusion The proposed development would have a real, tangible and negative impact on: - my day-to-day life, - my work running a CIC for vulnerable young people, - the wellbeing of the boys who attend our camps, - and the quiet natural environment on which the programme depends. For these reasons, I wish to participate in the examination and ask that the Planning Inspector gives full weight to the social, wellbeing and	The Applicant is confident that the assessment of socio-economic effects in **ES Volume 1 Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** and to human health and wellbeing in **ES Volume 1 Chapter 18: Human Health [APP-070]** robustly and proportionately set out the likely significance of effects on people as a result of the Scheme. The Applicant is therefore confident that this means there are no significant adverse effects anticipated to the users or operators of Wildnature Rites of Passage CIC.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			community impacts of the proposal, alongside environmental and technical considerations.	

4.21 Atlantis AV Solutions

Table 4-21 RR-0434

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
AVAS-001	Description and DCO Process	Introduction	Introduction and Business Interest Atlantis AV Solutions Ltd is a locally based rural business operating in and around North Wiltshire. We design, supply and maintain high-quality audio-visual, connectivity and control systems for private homes, farms, equestrian businesses and small commercial premises across the surrounding villages, including Foxley, Norton and neighbouring communities. Our business is rooted in this landscape. We rely on the rural character of the area, the quality of life it offers to staff, and the continued attractiveness of the countryside to residents, landowners and businesses who choose to live and invest here.	The Applicant notes this comment.
AVAS-002	Socio-Economics, Tourism and Recreation	Rural Environment and Business Sustainability	Rural Environment and Business Sustainability Our ability to recruit and retain skilled staff depends heavily on the quality of the local environment. Many of our employees choose to work for a rural business precisely because it offers peace, safety, and a working life that is not dominated by industrial noise, traffic or visual intrusion. The countryside around Lime Down is not a backdrop; it is a working environment that supports small	The Applicant has assessed effects on the landscape character and visual surroundings of the Scheme in **ES Volume 1, Chapter 8: Landscape and Visual Impact [APP-060]**. While the assessment has concluded significant adverse effect to specific views, no significant effect to the landscape character is anticipated as a result of any phase of the Scheme. The assessment of economic impacts from the Scheme in **ES Volume 1 Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** has largely been undertaken at an industry-level rather than individual businesses, which is considered a proportionate approach given the scale of the Scheme. The Applicant has aimed to provide a robust assessment of

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			businesses, farming, tourism, equestrian activity and professional services. The introduction of industrial-scale energy infrastructure would permanently change that environment, making it less attractive for both employees and clients. Once an area becomes defined by large-scale infrastructure, fencing, substations, lighting and service roads, it loses the very qualities that underpin rural enterprise. This has long-term implications for local economic resilience that are rarely reversed.	impacts to tourism and recreation, and to local employment in **ES Volume 1 Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]**. These impacts are not considered significant, accounting for approximately 0.17% of tourism-dependent employment across Wiltshire (29,000 estimate from Visit Wiltshire, 2021) and less than 0.29% of agricultural employment in Wiltshire (BRES, 2023). Additional mitigation measures have been secured through the **OCTMP [APP-287]**, **OPROWPPMP [APP-282]** and the **OSSCEP [APP-285]**. Together these seek to reduce these losses to tourism through mitigating traffic impacts, impact to PRoW, and focussing on local recruitment, promoting local suppliers where practicable, and through providing retention and retraining opportunities for workers in agriculture and tourism-dependent industries. These measures are secured by the relevant requirements in Schedule 2 to the **Draft DCO [APP-016]**.
AVAS-003	Site Selection and Alternatives Landscape and Visual	Scheme Location	Principle, Scale and Location Atlantis AV Solutions Ltd supports renewable energy in principle. We regularly install and integrate solar, battery and energy-management systems for private clients and understand the importance of the transition to low-carbon power. However, support for renewable energy does not imply support for inappropriate siting. The Lime Down proposal represents industrial-scale infrastructure spread across approximately 1,300 acres of open countryside. This is not small-scale rural diversification, but a fundamental change in land use.	National Policy Statement for renewable energy infrastructure (EN-3) Paras 2.10.11 and 2.10.18 explain that the availability of grid connection, suitable irradiance levels, and local topography are key inputs to the selection of sites suitable for large-scale solar generation developments. The number of locations within the UK at which large-scale solar generation is suitable is therefore likely to be limited, and this is a material issue when considering how the UK is to meet the urgent need for low carbon generation as is set out in the NPSs. This point is expanded upon in the **Statement of Need [APP-266]** in particular in Section 4.3. Section 7 of the **Statement of Need [APP-266]** provides evidence to support the suitability of the proposed location of the Scheme for large-scale solar plus storage in relation to the timeliness and availability of the grid connection, transmission system operability and the decarbonisation and energy security benefits the Scheme will bring forward from this location.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			The scale, intensity and permanence of the proposal are incompatible with the existing rural economy, which is based on agriculture, small businesses, tourism, heritage and high-quality residential use.	As set out in **ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP-056]** and the Site Selection Assessment Report **at ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]** an appraisal of alternative sites within a 20km radius of the Existing National Grid Melksham Substation (being the grid connection point for the Scheme) has been undertaken, which concludes that there are no more suitable locations within the 20km search area than the proposed location for the Scheme. The Scheme has been designed to deliver the greatest possible benefit from the available land and the available grid connection, whilst avoiding, minimising and/or mitigating harmful environmental effects. As per the description set out in **ES Volume 1, Chapter 3: The Scheme [APP-055]** the total area within the DCO Order Limits encompasses approximately 1,237 hectares (ha). Of this, the 'Solar PV Sites' comprise approximately 749.1 ha of land. Around 479.5 ha of this land is proposed as being required for installation of solar PV, battery storage, and associated infrastructure. The remaining 269.5 ha would provide areas dedicated to ecological mitigation, measurable Biodiversity Net Gain (BNG) delivery, landscaping, offsets and agricultural land managed for environmental enhancement and habitat creation. The Applicant remains committed to delivering a Scheme that makes a meaningful contribution to the UK's transition to net zero, while also seeking to minimise adverse impacts and maximise opportunities for environmental enhancement and community benefits.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
AVAS-004	Socio-Economics, Tourism and Recreation	Cumulative Impacts of Projects on Local Business	Cumulative Impact on Rural Business This proposal must be considered in the context of the cumulative impact of solar development across Wiltshire. The county has already absorbed a significant amount of ground-mounted solar infrastructure, much of it concentrated in rural locations. From a business perspective, the cumulative effect is not theoretical. It manifests in increased traffic, fragmented landscapes, loss of visual quality, and gradual industrialisation of areas that previously supported diverse rural enterprise. Lime Down is exceptionally large. Its impacts, including construction traffic, visual intrusion, noise, flood risk and disruption associated with a long cable route, would not merely add to existing pressures but significantly intensify them. The burden placed on rural infrastructure, roads and communities risks becoming unsustainable. For local businesses, this creates uncertainty and discourages investment.	A comprehensive Cumulative and In-Combination Effects Assessment has been undertaken in accordance with Planning Inspectorate Advice Note 17 and the relevant NPS EN-1, NPS EN-3 and NPS EN-5 requirements which are set out **within ES Volume 1, Chapter 21 Cumulative and In-combination Effects [APP-073] and associated Appendices [APP-264].** Interaction with proposed or consented but not yet built developments has been fully explored within each of the technical assessments **[APP-059 - APP-072]** with a summary of each of these assessments provided within **ES Volume 1, Chapter 21 Cumulative and In-Combination Effects [APP-073]**. Existing schemes are captured within the baseline environment in each of the technical assessments. The four-stage cumulative assessment methodology is described **within ES Volume 1, Chapter 6 EIA Methodology [APP-058].** 358 developments were included in the **Long List [APP-264].** 41 developments are included in the short list (and are therefore assessed) including a number of proposed solar and BESS developments. The list of developments included in the cumulative assessment was reviewed and developed in consultation with Wiltshire Council. Taking a conservative worse case approach, significant cumulative effects are identified at a limited and discrete number of receptors comprising tourism and recreation impacts during the construction phase on Corsham Park, PRoW WT|CORM|122, long path and Sustrans Cycle Route 403, and on skylark at a District level. With specific regard to the cumulative effects of the Scheme on economic conditions for local businesses, the assessment in Section 16.13 of **ES Volume 1, Chapter 16: Socio-**

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				Economics, Tourism and Recreation [APP-068] identifies that where cumulative impacts to tourism and recreation receptors may have an increased effect on local businesses, this is not anticipated to be of any greater significance than the Scheme assessed in isolation. As such, no cumulative significant adverse effect to local businesses has been assessed as likely to occur at any phase of the cumulatively assessed developments.
AVAS-005	Other Environmental Matters	BESS	Battery Energy Storage System (BESS) and Business and Operational Risks The inclusion of a large-scale Battery Energy Storage System introduces additional concerns from a business and operational standpoint. BESS facilities carry well-documented risks associated with thermal runaway and fire. Evidence from incidents elsewhere shows that such fires can be prolonged, difficult to extinguish, and require significant emergency response resources. In rural areas with limited fire-fighting capacity, this represents a non-trivial risk. There is also the potential for hazardous runoff resulting from fire suppression or battery damage, with implications for land, watercourses and downstream users. Any contamination event would have consequences not just for agriculture but for rural businesses operating nearby.	The Battery Energy Storage System (BESS) containers proposed for the Scheme will incorporate built-in safety features for fire avoidance, detection and suppression. The Scheme layout also incorporates separation distances between battery containers to ensure that any isolated fire would not become widespread or lead to a major incident. As shown **on ES Volume 2, Figure 3-1: Indicative Site Layout Plan [APP-081],** the battery containers will be located more than 200 metres from the nearest Public Right of Way and more than 500 metres from any residential receptors. The Applicant is currently discussing the approach to BESS safety with Dorset and Wiltshire Fire and Rescue Service (D&WFRS) and this discussion will be set out in the relevant Statement of Common Ground to be submitted at Deadline 1. An **Outline Battery Safety Management Plan (OBSMP) [APP-286]** has been prepared for the Scheme using guidance from Dorset and Wiltshire Fire and Rescue Service and incorporating recommendations of the National Fire Chiefs Council. The OBSMP ensures that risks associated with battery storage are appropriately mitigated. Section 6.1.1 of the **OBSMP [APP-286]** confirms that at the

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			In addition, BESS installations rely on continuous cooling systems involving fans and electrical equipment operating day and night. This introduces constant mechanical and tonal noise into environments that are currently extremely quiet. For businesses like ours, which operate in close relationship with residential and rural settings, the introduction of persistent background noise undermines amenity, staff wellbeing and the overall quality of the working environment.	detailed design stage, the selected BESS will have undertaken Large Scale Fire Testing (LSFT) to fully inform inputs for risk assessment tools which will be utilised together with detailed consequence modelling to provide a comprehensive site operations and emergency response safety audit. LSFT is a mandatory requirement under NFPA 855 (2026) safety standards to demonstrate thermal insulation protection capabilities of the BESS enclosure design, validate minimum equipment spacing distances, and demonstrate that deflagrations do not occur and/or can be safely constrained. As set out in the **OBSMP [APP-286]**, the BESS Area will have a robust and validated Emergency Response Plan (ERP), developed in consultation with Dorset & Wiltshire Fire and Rescue Service at the detailed design stage. Section 5.4 of the **OBSMP [APP-286]** specifies the typical emergency response protocols, procedures and safety information that will be included in the ERP. The ERP will apply to all stages of the Scheme, including construction, operation and decommissioning. Potential effects of toxic gases arising from a BESS fire are assessed in **ES Volume 1, Chapter 15: Air Quality [APP-067]** and in **ES Volume 1, Chapter 20: Other Environmental Matters [APP-072],** Section 20.7: Major Accidents and Disasters. An assessment of how these fumes could affect sensitive receptors within a 1 km radius of the BESS Area, including residential properties and ecological receptors, is provided **in ES Volume 1, Chapter 15: Air Quality [APP-067]**. This assessment concludes that no significant off-site impacts are predicted should a fire event occur. In the unlikely event of a fire, the precautionary measures set out in the **Outline Battery Safety Management Plan (OBSMP) [APP-286]** — including advice

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				to remain indoors and close windows — would further reduce potential impacts to residents. The **OBSMP [APP-286]** is secured through Requirement 6 (Battery Safety Management) in Schedule 2 of the **Draft DCO [APP-016]**, which provides that Work No. 2 must not commence until a Battery Safety Management Plan has been submitted to and approved by the relevant planning authority. The approved plan must be substantially in accordance with the **OBSMP [APP-286]**. The **Draft DCO [APP-016]** also requires the relevant planning authority to consult with Dorset and Wiltshire Fire and Rescue Service and the Environment Agency before determining the application, and that the Battery Safety Management Plan must be implemented as approved. Potential effects of the Scheme on water quality and contamination risk are assessed in **ES Volume 1, Chapter 11 Hydrology, Flood Risk and Drainage [APP-063]**, which considers pollution pathways to surface water and groundwater during both construction and operation. The Scheme incorporates sealed and isolatable drainage principles for the BESS and substations to ensure that operational spillages or firewater can be contained and managed without discharge to the surrounding environment. In the event of an incident, drainage isolation measures allow potentially contaminated water to be retained on site and tested prior to any controlled release or removal by a licensed waste contractor. These principles are consistent with the approach described in the **OBSMP [APP-286]** and will be further developed through the detailed drainage design secured through the DCO discharge process. The Applicant notes that it is discussing the approach to pollution resulting from battery fire is with both the

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				Environment Agency and the Lead Local Flood Authority (LLFA) and this discussion will be set out in the relevant Statements of Common Ground to be submitted at Deadline 1. Mitigation measures to control contamination risk during construction are set out in the **Outline Construction Environmental Management Plan [APP-277].** Routine maintenance and panel cleaning will use minimal water and no detergents or chemical cleaning agents, in line with industry standards and best practice, so there is no expected risk from cleaning runoff. In addition, the removal of agrichemical inputs through the cessation of farming activities will further reduce contamination risks compared to existing use. The preparation, approval and implementation of a Construction Environmental Management Plan substantially in accordance with the **Outline Construction Environmental Management Plan [APP-277]** is secured through Requirement 13 in Schedule 2 of **the Draft Development Consent Order [APP-016]**, ensuring that construction works are carried out in accordance with the approved CEMP and that contamination risks are appropriately managed throughout construction of the Scheme. The noise impacts from the operation of the Scheme and its components, including the BESS, are assessed in Section 14.10 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066],** with supporting modelling provided **in ES Volume 3, Appendix 14-4: Noise Modelling [APP-237]**. The assessment considers operational noise from all Scheme infrastructure, including the BESS, using realistic worst-case design parameters.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				A penalty has been applied to predicted noise levels from the Scheme infrastructure to account for the distinctive nature of the sound. Tonal noise would be associated with the substation transformers but noise from the transformers is expected to be well below that of other sources at all residential dwellings. The Applicant notes that the approach to noise from BESS has been discussed with Wiltshire Council, as described in Section 14.2 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066].** Potential mitigation measures are detailed in Section 14.9 **of ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**, and with these measures in place, significant effects from operational noise are not expected. The **Outline Operational Environmental Management Plan [APP-278]** commits to noise levels from the Scheme at residential dwellings being the same as or below those modelled in the ES. This provides reassurance that significant effects from operational noise will be avoided while allowing flexibility in how this is achieved. The preparation, approval and implementation of the detailed OEMP, substantially in accordance with the outline operational environmental management plan, is secured through Requirement 14 of Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring operational noise from the BESS and other Scheme components is appropriately controlled throughout the lifetime of the Scheme.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				Impacts on mental health and wellbeing, in respect of noise as a result of impacts on amenity, have been assessed in **ES Volume 1, Chapter 18: Human Health [APP-070]** and find that no significant effects to mental health and wellbeing are anticipated as a result of any phase of the Scheme.
AVAS-006	Transport and Access	Transport, Construction and Disruption	Transport, Construction and Disruption The proposed level of construction activity, involving approximately 20,000 vehicle movements, would place heavy pressure on rural roads that are not designed for sustained HGV traffic. Disruption of this scale affects business operations directly: delayed travel times, reduced reliability for site visits, increased safety risks, and damage to roads that serve farms, homes and local enterprises. These impacts extend well beyond the construction site itself and would persist for years.	The potential effects of construction traffic on the local highway network are assessed **in ES Volume 1, Chapter 13: Transport and Access [APP-065]**, which considers construction vehicle movements, traffic volumes, road safety and effects on road users. The operational period is for up to 60 years. During the operation and maintenance phase, there are anticipated to be around five visits to each Solar PV Site per month for maintenance purposes. These would typically be made by light van or 4 x 4 type vehicles. There will be occasional trips to the proposed habitat areas within the Solar PV Sites for operational and maintenance purposes. These would typically be made by light van or 4 x 4 type vehicles and will use the existing field access locations detailed in Table 3-5 **of ES Volume 1, Chapter 3: The Scheme [APP-055] shown in ES Volume 2, Figure 13-13: Operational Only Access Locations: Solar PV Sites [APP-158].** Vehicle trip generation associated with these access locations will be the same or lower than the existing agricultural use. There will be no transport operation effects associated with the installed Grid Connection Cables (within the Cable Route Corridor) as they will be located underground. Access may

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				be required for maintenance, but this is only likely once or twice a year. In light of this, effects on severance, driver delay, NMU delay and amenity, road safety and hazardous loads during the operation and maintenance phase of the Scheme are considered to be negligible or not significant. The effects will be long-term, as the design life of the Scheme is anticipated to be 60 years The construction period set out in **ES Volume 1, Chapter 13: Transport and Access [APP-065]** is two years and the impact is summarised below. Construction vehicle movements will be managed through a Construction Traffic Management Plan. An **Outline Construction Traffic Management Plan (CTMP) [APP-287]** has been prepared and submitted with the DCO application. The aim of the CTMP is to ensure that the effect of the construction phase on the local highway network is minimised. The **Outline CTMP [APP-287]** sets out measures to coordinate construction deliveries by HGVs to arrive and depart between 09:30 and 16:30 where possible, to avoid peak network hours of 08:00–09:00 and 17:00–18:00. It also includes a community liaison element to keep local communities informed about the construction process and to provide a contact for feedback should any issues arise. Compliance with the CTMP will be monitored by the Developer, Contractor and Wiltshire Council as local highway authority. The preparation, approval and implementation of the final CTMP, substantially in accordance with the **Outline CTMP**

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				[APP-287], are secured through Requirement 15 of Schedule 2 of the **Draft Development Consent Order [APP-016],** ensuring construction traffic impacts are appropriately managed throughout the construction phase of the Scheme. The potential effects of construction traffic on highway safety and accident risk are assessed in **ES Volume 1, Chapter 13: Transport and Access [APP-065],** which considers changes in traffic flows, HGV movements and accident risk on the local road network. Links experiencing traffic increases above defined assessment thresholds were taken forward for detailed analysis. Supporting technical evidence is provided **in ES Volume 3, Appendix 13-1: Transport Assessment [APP-233],** which includes an assessment of baseline accident data and predicted changes in collision risk arising from construction traffic. The assessment concludes that the level of construction traffic associated with the Scheme is unlikely to materially affect road safety on links within the Study Area, and no significant adverse effects on accident risk are anticipated. The capacity of local roads and infrastructure to accommodate construction vehicles is assessed in **ES Volume 1, Chapter 13: Transport and Access [APP-065],** which considers construction traffic volumes, vehicle types, route suitability and network performance. The assessment concludes that, with appropriate mitigation in place, there would be no significant adverse impacts on the local highway network. Supporting technical information is provided in **ES Volume 3,**

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				Appendix 13-1: Transport Assessment [APP-233], which identifies specific locations where traffic management measures or passing arrangements may be required on narrower sections of construction routes. The assessment presented in Annex H of **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]** demonstrates adequate carriageway width or frequency of passing place opportunity to pass at least an HGV and a light vehicle as requested in comments provided by WC. All construction routes also include passing points to allow two HGVs to pass. Mitigation measures to manage construction traffic safely are set out in the **Outline Construction Traffic Management Plan (OCTMP) [APP-287]** , which includes defined vehicle routing, delivery scheduling and coordination with the local highway authority. The preparation, approval and implementation of the final CTMP, substantially in accordance with the outline CTMP, are secured through Requirement 15 of Schedule 2 of the **Draft Development Consent Order [APP-016],** ensuring construction traffic is managed safely and impacts on local roads and infrastructure are appropriately managed throughout the construction phase of the Scheme.
AVAS-007	Description and DCO Process	Conclusion	Conclusion I have already written in a personal capacity but as MD of my business I confirm that Atlantis AV Solutions Ltd is not opposed to renewable energy, nor to progress. We are, however, opposed to development that is in the wrong place, at the	The Applicant is confident that the assessment undertaken in **ES Volume 1 Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** has been undertaken in a robust manner and has sufficiently considered the Scheme's likely effects on local economic conditions. This chapter considers potential impacts on construction and engineering sectors, agricultural activity, tourism-related businesses, and wider local economic conditions during construction, operation and

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			wrong scale, and with impacts that undermine the long-term viability of rural communities and businesses. The Lime Down proposal represents industrial-scale infrastructure imposed on a landscape whose value lies in its tranquillity, productivity and diversity of use. The cumulative effects on agriculture, transport, landscape character, noise, safety and business confidence weigh heavily against consent. From a local business perspective, this proposal threatens the very conditions that allow rural enterprise to function and grow. For these reasons, Atlantis AV Solutions Ltd believes that the Development Consent Order should be refused. Thank you for considering this representation.	decommissioning. The assessment does not anticipate that the Scheme will generate any significant adverse effects to any industry or economic sector at any phase of the Scheme.

4.22 Wiltshire Ramblers

Table 4-22 RR-4935

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
WR-001	Description and DCO Process	Introduction	I refer to my submission in a personal capacity to the non-statutory consultation by the Lime Down Solar Farm (LDSF), which I provided on 25 April 2024, and to my submission on behalf of the Wiltshire Ramblers to the statutory consultation by the LDSF, which I provided on 19 March 2025.	The Applicant acknowledges the submissions made in a personal capacity during the non-statutory consultation on 25 April 2024 and on behalf of the Wiltshire Ramblers during the statutory consultation on 19 March 2025. The representation submitted during the non-statutory consultation is recorded and summarised within the **Stage 1 Consultation Summary Report [APP-022]**, and the representation submitted during the statutory consultation is recorded and addressed within the **Consultation Report [APP-031],** which sets out how feedback received has been taken into account in the development of the Scheme.
WR-002	Description and DCO Process	Introduction	In the latter submission I merely advised that we agreed with the detailed response made by the Wiltshire branch of the British Horse Society (BHS).	The Applicant has provided a detailed response to BHS's Relevant Representation, see Applicant's Response to RR-4647.
WR-003	Description and DCO Process	Introduction	I now refer to the response made on 2 January 2026 by the BHS in connection with LDSF's application to the Planning Inspectorate (PINS) for a Development Consent Order to be made. Wiltshire Ramblers again confirm that we agree with the comments made by BHS, which are essentially a summary of its previous responses.	The Applicant has provided a detailed response to BHS's Relevant Representation, see Applicant's Response to RR-4647.
WR-004	Landscape and Visual	Impact on Landscape Character	As a summary of our own position on the application, in our view: • We are strongly opposed to the whole project, which will convert a peaceful rural community into an	The Scheme has been designed to deliver the greatest possible benefit from the available land and the available grid connection, whilst avoiding, minimising and/or mitigating harmful environmental effects.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			industrial zone, and will have a markedly negative effect, primarily on the inhabitants of the huge area to be covered by the LDSF, but also on those in the surrounding area	As per the description set out in **ES Volume 1, Chapter 3: The Scheme [APP-055]** the total area within the DCO Order Limits encompasses approximately 1,237 hectares (ha). Of this, the 'Solar PV Sites' comprise approximately 749.1 ha of land. Around 479.5 ha of this land is proposed as being required for installation of solar PV, battery storage, and associated infrastructure. The remaining 269.5 ha would provide areas dedicated to ecological mitigation, measurable Biodiversity Net Gain (BNG) delivery, landscaping, offsets and agricultural land managed for environmental enhancement and habitat creation. The Applicant remains committed to delivering a Scheme that makes a meaningful contribution to the UK's transition to net zero, while also seeking to minimise adverse impacts and maximise opportunities for environmental enhancement and community benefits.
WR-005	Description and DCO Process	Alternative Methods of Clean Energy	• We are of course aware of the need to maximise the provision of clean electricity because of climate change but believe that there are other, better methods of achieving this aim than the creation of gigantic solar farms.	The **Statement of Need [APP-266]** describes that there is an urgent and unprecedented need for new low carbon generation in the UK to meet our climate change, energy security and affordability targets. Further, the Government considers that a secure, reliable, affordable, net zero consistent system in 2050 is likely to be composed predominantly of wind and solar (NPS EN-1, Para 3.3.20). Further, Section 2.9 of the **Statement of Need [APP-266]** describes that the government is seeking a large capacity of new low carbon schemes to come forwards to prioritise projects needed for 2030, while maintaining a robust pipeline of projects beyond 2030 towards meeting net zero by 2050.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				The government's Clean Power 2030 Action Plan (December 2024) includes technologies prioritised for 2030 and which are considered to be important to developing a robust pipeline of projects for delivery after 2030, including wind, solar, nuclear, hydro and abated thermal generation. The Applicant considers that nuclear and abated thermal generation are not suitable to be deployed at this location in similar timeframes to the Scheme, if at all. Offshore wind is also clearly not applicable due to the landlocked location of the Scheme. No large nearby river courses could offer a hydro scheme of a similar scale to the Scheme. Section 6.7 of the **Statement of Need [APP-266]** demonstrates that at a large-scale scheme level, the amount of electricity generated from an onshore wind scheme per year per acre of that scheme is similar to the amount of electricity generated from a large-scale solar scheme, and the indicative design of this Scheme specifically leads to a land-take ratio which lies within the guideline range of 2 – 4 acres per MW of output for the solar and related infrastructure, as set out at NPS EN-3 (2023) Paragraph 2.10.17. The Scheme is also therefore within the guideline range of 4 – 5.6 acres per MW of output as updated in NPS EN-3 (2025) Paragraph 2.10.9. The Scheme has received notification that, as part of NESO's connection queue reprioritisation process, the solar component of the scheme has been re-prioritised as a Gate 2 Phase 1 connection (i.e. connecting in 2030 or earlier) and that the BESS component of the Scheme has been re-prioritised as a Gate 1 connection. The indicative connection date of the BESS has not yet been confirmed. National Policy Statement EN-1 also states that the

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				Secretary of State should assess all applications for development consent for the types of infrastructure included by the NPS (including solar) on the basis that there is demonstrated urgent need for them, that substantial weight should be given to this need, and that the Secretary of State is not required to consider the specific contribution of any individual project to be satisfied that need is established [EN-1 Paras 3.2.6 - 3.2.8]. This representation goes to the merits of the NPS, and to have regard to it would be directly in contradiction of NPS EN-1 (in particular the paragraphs cited above that make clear that the need is established and that there is no requirement to consider the contribution of individual projects). The determination of the Applicant's DCO Application is not the means by which to challenge the provisions of the NPS, and it is for this reason that the ExA and SoS are able to disregard this representation and any similar others, pursuant to sections 87, 94 and 106 of the Planning Act 2008 during the examination of the Application and when determining the Application.
WR-006	Cumulative and In-Combination effects	Other Solar Projects in the Vicinity	Wiltshire apparently already contains 8 out of the 10 largest solar farms in the country and we question the need for another very large one.	Cumulative effects with other projects has been carefully considered as part of the Scheme with other projects, both existing and proposed, taken into account. In terms of the Lime Down project, a comprehensive Cumulative and In-Combination Effects Assessment has been undertaken in accordance with Planning Inspectorate Advice Note 17 and the relevant NPS EN-1, NPS EN-3 and NPS EN-5 requirements which are set out within **ES Volume 1, Chapter 21: Cumulative and In-Combination Effects [APP-074]** and associated Appendices **[APP-264].** Interaction with proposed or consented but not yet built developments has been fully explored within each of the technical assessments **[APP-059 - APP-072]** with a summary of each of these assessments provided

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				within **ES Volume 1, Chapter 21 Cumulative and In-Combination Effects [APP-073].** Existing schemes are captured within the baseline environment. The four-stage cumulative assessment methodology is described within **ES Volume 1, Chapter 6 EIA Methodology [APP-058].** 358 developments were included in the Long List **[APP-264].** 41 developments are included in the short list (and are therefore assessed) including a number of proposed solar and BESS developments. The list of developments included in the cumulative assessment was reviewed and developed in consultation with Wiltshire Council. Table 21-8 within **ES Volume 1, Chapter 21 Cumulative and In-Combination Effects [APP-073] identifies that,** taking a conservative worse case approach, significant cumulative effects with the short list of developments are identified at a limited and discrete number of receptors comprising tourism and recreation impacts during the construction phase on Corsham Park, PRoW WT|CORM|122, long path and Sustrans Cycle Route 403, and on skylark at a District level. Skylark-specific mitigation and habitat enhancement measures are incorporated into the Scheme design to reduce effects on skylark as far as practicable and are described in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061].** These include the provision of suitably large, open set-aside and grassland habitats designed to provide suitable skylark breeding and foraging conditions. These measures are illustrated in **ES Volume 2, Figure 3-4: Landscape and Ecological Mitigation Plan [APP-084]** and detailed in the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]**. Such measures have been designed to reduce

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				the anticipated residual effects resulting from the Scheme to a Local level of geographic importance.
WR-007	Soils and Agriculture	Agricultural Land	The LDSF project will be built on productive farmland which we can ill afford to lose	The Scheme will result in a temporary but long-term and reversible loss of agricultural land for the operational life of the Scheme. As set out in **ES Volume 1, Chapter 17: Soils and Agriculture [APP-069]**, Section 17.10, this gives rise to a temporary, long-term moderate adverse effect on agricultural land overall, and a temporary, long-term major/moderate adverse effect on BMV land, both of which are assessed as significant. These effects are fully reported in the ES and are a matter for the Secretary of State to weigh in the planning balance against the need for the Scheme and its wider benefits. There are no significant permanent effects on agricultural land, as all land will be returned to its original use and condition as far as practicable following decommissioning. Through the establishment and maintenance of long-term grassland beneath and between the solar arrays, soil health, quality and structure are anticipated to improve over the lifetime of the Scheme, resulting in a temporary, moderate beneficial effect on soil resources at decommissioning, which is assessed as significant (ES Chapter 17, Sections 17.10 and 17.12).
WR-008	Socio-Economics, Tourism and Recreation	PRoWs	We do not agree with your astonishing claim that the project will have no significant impact on users of the Public Rights of Way (PRoW) within and around it. During the two-year construction period they will suffer significant damage, and any users of the PRoW will be at	The Applicant has assessed the likely effects to PROWs within a 2 km Study Area surrounding the Scheme's Order Limits. While **ES Volume 1 Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** has summarised the effects on the PROW network as not being significant at any phase of the Scheme, this is an overall assessment and accounts for the proportion of significant vs non-significant effects across the assessed area. This also considers the

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			constant risk of coming into contact with noisy machinery.	embedded and additional mitigation measures set out in the **OCTMP [APP-287]** and **OPROWPPMP [APP-282]**, secured respectively by Requirements 15 and 16 in Schedule 2 to the **Draft DCO [APP-016]**. A more detailed route-by-route assessment is undertaken in **ES Volume 3 Appendix 16-2 Tourism and Recreation Receptor Tables [APP-241]**, which identified residual significant effects to a small number of PROWs at Lime Down E, where construction and decommissioning effects cannot be mitigated to below a significant level, and as such will have to be considered as part of the planning balance in determining whether or not consent should be granted.. This also sets out the anticipated type of effect to each assessed PROW route at each phase of the Scheme, and what mitigation measures have been secured for it.
WR-009	Socio-Economics, Tourism and Recreation	PRoWs	After this they are likely to find that their chosen PRoW go through field after field full of solar panels and are flanked by high fences which will destroy the present views. Use of PRoW is likely to diminish dramatically, with the resulting risk that they will become overgrown and lost long before the solar park is decommissioned	The Applicant understands the importance of PROWs for recreation and their benefit to physical and mental wellbeing. Whilst the user experience will be different to current conditions, the planting of landscape and ecological mitigation, and the provision of permissive paths to improve connectivity is anticipated to go a substantial way to improve user experience and maintain the number of users of the affected PROWs. These measures are shown on **ES Volume 2, Figures 3-4-1 to 3-4-5.2 [APP-084]** and secured through the **OLEMP [APP-283]** by Requirement 7 in Schedule 2 to the **Draft DCO [APP-016]**. The Applicant is committed to ensuring PROWs are kept to a good standard throughout the Scheme's operational lifetime, as maintenance of public rights of way within land under freehold acquisition by the Applicant is their responsibility to maintain, and is secured through the **OPROWPPMP [APP-282]** by Requirement 16 in Schedule 2 to the **Draft DCO [APP-016]**. Furthermore, fencing is not proposed within 15 m of the centreline of existing PROWs. The majority of site

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				fencing is to consist of 2 m deer stock fencing. This is secured in the **OPROWPPMP [APP-282]** This is to control large mammalian movements and provide a visual deterrent to entering the Solar PV Array areas, whilst maintaining a more open aspect for PROW users.
WR-010	Socio-Economics, Tourism and Recreation	PRoWs	• We note from the Permissive Paths Management Plan that it is intended to provide permissive paths for PRoW users during and after the period of construction. Like the BHS, we are not in favour of permissive routes. As they can be withdrawn, temporarily or permanently, at any time, and are not usually shown on either the definitive map or the Ordnance Survey maps. Dedication of such permissive routes by the landowners wold clearly define responsibilities for their enforcement and maintenance	The Applicant has committed to the provision of permissive paths to improve connectivity across the existing PROW network. The operation of permissive paths is set out in the **OPROWPPMP [APP-282]** and secured by Requirement 16 in Schedule 2 to the **Draft DCO [APP-016]**. This commits to ensuring these routes are kept open and well maintained throughout the operational lifetime of the Scheme. The Applicant accepts that the provision of permissive paths is less preferential than new rights of way; however, this comes as a result of practical limitations of the Scheme. As the Scheme's operational lifetime is no more than 60 years, this is temporary (albeit long-term), and the **Draft DCO [APP-016]** commits to the requirement for the decommissioning of the Scheme and restoration of the land back to agricultural use. As part of that agreement, any permissive access to the land would go back to being the responsibility of the landowner. For some of the permissive routes (such as on Lime Down B), retaining these routes as proposed may cause barriers to returning the land in full to agriculture.
WR-011	Description and DCO Process	Developer	The LDSF has emphasised its green credentials, but in our view this is no more than a cynical attempt to disguise the fact that the project is essentially a potentially very profitable investment opportunity for	The Scheme aims to help meet national targets for clean energy and net zero targets set out in legislation and policy. The aim is to deliver long term environmental benefit alongside a secure energy supply.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			what appear to be mainly foreign investors	The **ES [APP-052 to APP-265]**, **Statement of Need [APP-266]**, and **Planning Statement [APP-267]** provide an assessment of the adverse and beneficial effects associated with the Scheme, an explanation of why the Scheme is needed and the benefits of solar energy generation, and the other benefits proposed by the Scheme. The Applicant recognises that both landowners and the local community are key stakeholders. While landowners will receive a lease income, as in normal in any commercial lease agreements, the Scheme also aims to deliver wider benefits, including biodiversity enhancements, opportunities for local supply chain involvement, and onsite and offsite community benefit initiatives, which will be developed in consultation with local representatives. The Applicant is committed to meeting all planning, environmental, and construction policies and standards. The Scheme is being developed in line with legal and regulatory requirements, with engagement with all statutory and non-statutory bodies, ensuring quality and accountability throughout. The Applicant, Lime Down Solar Park Limited is a 100% subsidiary of IGP UK Projects Limited. Both are registered in England and Wales and subject to UK tax law and regulations. Investment may come from a range of sources, including international ones. This is common practice with UK infrastructure Schemes and helps fund the transition to clean energy at the scale required.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
WR-012	Consultation and Engagement	Consideration of Feedback	The whole premise of the consultations that have taken place is that the project will go ahead, and you are only seeking comments on the effectiveness or potential problems of various aspects of the project.	The Applicant considers that the statutory consultation has been robust, thorough and undertaken in accordance with the requirements of the Planning Act 2008, the Environmental Impact Assessment (EIA) regulations, and the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009. The **Consultation Report [APP-022]** sets out the Applicant's approach to pre-application consultation. Throughout the consultation period, anyone was welcome and encouraged to get in touch through any of the free-to-use communication channels provided, including email, freephone, and post. Respondents were also invited to attend the in-person and virtual community information events, where they could view the maps and ask questions or seek clarification directly to the Project team. The Applicant also notes that the examination process provides a further opportunity for interested parties to comment on the Scheme. This examination is managed by an independently appointed Examining Authority. Further to this, the Applicant provided an extended relevant representation period beyond the minimum statutory timeframe to allow sufficient time for members of the public to review the submitted application documents and register as an interested party. While the formal consultation process has now ended, the Applicant continues to welcome engagement from the community through this next phase of the Examination process.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
WR-013	Socio-Economics, Tourism and Recreation Community Benefits	PRoWs and Community Benefits	On the assumption that this is what will happen, we commend Wiltshire Council's recommended improvements to the PRoW in and around the LDSF site, as described in Wiltshire Council's Relevant Representation, which was provided to you earlier this month	The Applicant confirms that they are in ongoing discussions with Wiltshire Council's PROW and Countryside Access Team to agree which of the PROW improvement recommendations can be secured directly through the Scheme, versus those that can be funded through the Community Benefit Fund. This discussion is ongoing and is reported in the Statement of Common Ground with Wiltshire Council to be submitted at Deadline 1.

4.23 Alicia Hawker Eventing Ltd

Table 4-23 RR-0145

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
AHEL-001	Description and DCO Process	Introduction	Relevant Representation in Opposition to Lime Down Solar Park (EN010168) To the Planning Inspectorate, I am writing to formally register as an Interested Party and to submit my strong objection to the Development Consent Order application for Lime Down Solar Park.	The Applicant is confident that the proposed management and mitigation measures set out in the **ES [APP-052 to APP-265]** are comprehensive and robust and that the Scheme aligns with national and local planning policy; this is outlined in the **Planning Statement [APP-267]**. Of particular relevance are Annex A: National Policy Statement Accordance Tables and Annex B: Local Policy Accordance Tables, of the Planning Statement which set out an appraisal of the Scheme against the policies.
AHEL-002	Description and DCO Process	Introduction	I operate a horse livery and competition horse training business near Hullavington, within close proximity to the proposed development. My objection is based on the severe, adverse impacts the project would have on my business, the safety of my clients, the local economy, and the character of the area.	The Applicant confirms that Alicia Hawker Eventing Ltd. was not identified as an equestrian facility in the DCO submission documentation and, as such, was not assessed in **ES Volume 3 Appendix 16-2 Tourism and Recreation Receptor Tables [APP-241]**. The Applicant has identified the location of this business based on the business' website, and has identified that they are located approximately 2.3 km from the Cable Route Corridor, and 2.5 km from the nearest Solar PV Sites (Lime Down C and D). As such, the Applicant considers that they would have been minded to scope this location out from full assessment on the basis of the distance between the Scheme and this equestrian facility, and the minimal likelihood of direct impacts on their operations. The Applicant has responded to each of the matters raised below.
AHEL-003	Transport and Access	Traffic Impact	Direct Threat to a Viable Rural Business and Employment The proposed industrialisation of the countryside directly threatens the viability of my business.	The Applicant has assessed the likely impacts of construction traffic movements on the local highway network in **ES Volume 1 Chapter 13: Transport and Access [APP-065]** and finds there are no significant adverse effects to driver delay, non-motorised user delay, safety, or fear and

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			· Loss of Core Business Function: The safety and tranquillity of the local lanes are the primary reasons my seven clients keep their horses at my livery. All have indicated they will remove their horses if the project proceeds, due to the anticipated surge in traffic and the destruction of the rural environment they pay to access. This would result in the immediate loss of my primary income.	intimidation to users from HGV movements, subject to implementation of mitigation measures in the **OCTMP [APP-287]**, secured by Requirement 15 in Schedule 2 to the **Draft DCO [APP-016]**. Proposed construction routes for HGVs have been presented at **ES Volume 2, Figures 13-11 and 13-12 [APP-156 and APP-157]**. While there is potential for interaction with equestrians from Alicia Hawker Eventing on hacking routes west of the Cable Route Corridor or where crossing the A429, no construction routes are proposed within approximately 2 km of the facility (the A429, and the road from the A429 at Hullavington towards Norton). As such, no substantial change to the safety or tranquillity of the environment around the equestrian facility is anticipated.
AHEL-004	Transport and Access	Traffic Impact	Endangerment of Essential Training: I train competition horses, for which hacking on quiet roads is an irreplaceable part of their training and mental wellbeing. The introduction of heavy goods vehicles (HGVs) and construction traffic onto narrow rural lanes would make this activity prohibitively dangerous, destroying a key component of my business.	Proposed construction routes for HGVs have been presented at **ES Volume 2, Figures 13-11 and 13-12 [APP-156 and APP-157]**. While there is potential for interaction with equestrians from Alicia Hawker Eventing on hacking routes west of the Cable Route Corridor or where crossing the A429, no construction routes are proposed within approximately 2 km of the facility (the A429, and the road from the A429 at Hullavington towards Norton). Given the amount of optionality for hacking routes available to the facility's users, it is not anticipated that traffic associated with the Scheme will have a substantial impact on the safety of hacking in the area surrounding the facility. The Applicant furthermore points to the commitments that HGV movements associated with Scheme construction would be limited to 09:30-16:30 on weekdays and 09:30-13:30 on Saturdays, with no works being undertaken on Sundays. This is committed through the **OCTMP [APP-287]**, secured by Requirement 15 in Schedule 2 to the **Draft DCO [APP-016]**. As such, the Applicant is confident that there are sufficient

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				measures to ensure equestrian users of highways are not significantly affected.
AHEL-005	Socio-Economics, Tourism and Recreation	Employment	Redundancies and Loss of Local Employment: The likely closure of my business would force me to make two full-time staff redundant and cease using the services of four local freelance grooms. This aligns with Wiltshire Council's assessment that the project could cause the loss of up to 50 tourism-related jobs.	The Applicant does not consider that this facility is likely to experience any significant adverse effects to its operations, as a result of its distance from the Scheme and intervening topography largely mitigating visual impacts, and the avoidance of its location for use by HGV traffic. The Applicant therefore does not consider it likely that job losses as a result of the Scheme at this location are likely.
AHEL-006	Transport and Access	Highway Safety	2. Incompatibility with Highway Safety and Existing Land Use The developer's proposals fail to adequately address the severe highway safety implications for vulnerable road users.	The potential effects of construction traffic on highway safety and accident risk are assessed in **ES Volume 1, Chapter 13: Transport and Access [APP-065]**, which considers changes in traffic flows, HGV movements and accident risk on the local road network including for Non Motorised Users. Links experiencing traffic increases above defined assessment thresholds were taken forward for detailed analysis. Supporting technical evidence is provided in **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]**, which includes an assessment of baseline accident data and predicted changes in collision risk arising from construction traffic. The assessment concludes that the level of construction traffic associated with the Scheme is unlikely to materially affect road safety on links within the Study Area, and no significant adverse effects on accident risk are anticipated. Mitigation measures to manage construction traffic safely are

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				set out in the **Outline Construction Traffic Management Plan [APP-287]**, which includes defined vehicle routing, delivery scheduling and coordination with the local highway authority. The preparation, approval and implementation of the final CTMP, substantially in accordance with the **Outline Construction Traffic Management Plan [APP-287]**, are secured through Requirement 15 of Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring construction traffic is managed safely throughout the construction phase of the Scheme.
AHEL-007	Transport and Access	Suitability of Local Road Infrastructure	The narrow local lanes are wholly unsuitable for the volume and type of construction traffic generated by an 878-hectare project.	The capacity of local roads and infrastructure to accommodate construction vehicles is assessed in **ES Volume 1, Chapter 13: Transport and Access [APP-065]**, which considers construction traffic volumes, vehicle types, route suitability and network performance. The assessment concludes that, with appropriate mitigation in place, there would be no significant adverse impacts on the local highway network. Supporting technical information is provided in **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]**, which identifies specific locations where traffic management measures or passing arrangements may be required on narrower sections of construction routes. The assessment presented in Annex H of **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]** demonstrates adequate carriageway width or frequency of passing place opportunity to pass at least an HGV and a light vehicle as requested in comments provided by WC. All construction routes also include passing points to allow two HGVs to pass.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				Mitigation measures to manage construction traffic are set out in the **Outline Construction Traffic Management Plan (CTMP) [APP-287]** . The CTMP is designed to minimise the effects of construction traffic on local roads and includes measures for vehicle routing, delivery scheduling and liaison with the local highway authority. The preparation, approval and implementation of the final CTMP, substantially in accordance with the outline CTMP, are secured through Requirement 15 of Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring construction traffic impacts on local roads and infrastructure are appropriately managed throughout the construction phase of the Scheme.
AHEL-008	Transport and Access	Highway Safety	Mixing HGVs with horses, cyclists, and pedestrians on these roads creates an unacceptable risk of serious accidents. The British Horse Society emphasises the importance of safety for equestrians on roads, a condition the project would utterly undermine.	The Applicant notes that road safety has been addressed in detail in the Applicant's responses above. With regard to horse-riders, public rights of way such as bridleways and byways and the use of the highway network for recreational users have been considered as specific recreational receptors in the assessment in the **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]**. The likely effects on individual PROWs are specifically assessed in **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]**. The Applicant confirms that the majority of significant adverse effects can be mitigated, however understands that some significant adverse effects to users of routes in Lime Down E cannot be mitigated further during construction. No significant residual effects are anticipated during the operational phase of the Scheme. The Applicant has committed to ensuring the operation or recreational use of PROWs is protected as much as possible through the

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				implementation of embedded and additional mitigation measures set out in the **OCTMP [APP-287]** and **OPROWPPMP [APP-282]**, secured respectively by Requirements 15 and 16 in Schedule 2 to the **Draft DCO [APP-016]**. To confirm, an assessment on safety and accidents is provided in **ES Volume 1, Chapter 13: Transport and Access [APP-065]**. Links with traffic increases above identified thresholds, were taken forward for further assessment. As part of the assessment, it is concluded that the level of construction traffic associated with the Scheme is unlikely to materially affect road safety on the links in the Study Area. The Scheme has sought to comply with British Horse Society guidance for drivers by including relevant measures for HGVs (speed limits of 10mph and giving way to non-vehicular users) at points where HGVs and horse riders are most likely to meet (site accesses and where accesses cross or utilise any part of unsurfaced roads or PROWs). The Applicant has also committed to HGVs being required to use specific routes to access the Scheme, allowing horse riders to better plan around meeting HGV traffic on their hacking routes. These measures are secured through the **OCTMP [APP-287]** and **OPROWPPMP [APP-282]**, secured respectively by Requirements 15 and 16 in Schedule 2 to the **Draft DCO [APP-016]**.
AHEL-009	Socio-Economics, Tourism and Recreation	Tourism	3. Significant Adverse Impact on Local Economy and Landscape My business is a small but representative part of the wider local economy and landscape that stands to be damaged. Wiltshire Council	The Applicant has assessed the likely impacts to the tourism-based economy in **ES Volume 1 Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]**. Therein, the Applicant has assessed that there is a likely worst-case temporary loss of 50 FTE tourism industry jobs and loss of £1.76 million GVA per annum as a result of the Scheme's

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			estimates the construction would cause a loss of approximately £1.76 million per year in tourism spending. My business contributes to this visitor economy, and its closure would be part of this wider economic harm. · The council also states the project would cause "*substantial, long-term harm to landscape character*", directly undermining the rural appeal that businesses like mine depend upon.	construction. The Applicant does not however agree with Wiltshire Council that this effect on tourism employment is significant, accounting for approximately 0.17% of tourism employment across Wiltshire and less than 0.15% of the value of the combined tourism industry value across Wiltshire (Visit Wiltshire, 2021). The Applicant also seeks to reiterate that this is a temporary effect, anticipated to occur during construction, based on a worst-case scenario determined by likely significant effects from the Scheme, with recovery to tourism businesses anticipated to begin as soon as construction works are complete. Additional mitigation measures (which were not quantified for inclusion in the assessment of potential losses to employment) through the **Outline Skills, Supply Chain and Employment Plan [APP-285]** seek to reduce tourism employment losses through focussing on local recruitment, promoting local suppliers where practicable, and through providing retraining opportunities for workers in tourism-dependent industries. The Applicant further reiterates that as a result of the location of Alicia Hawker Eventing in relation to the Scheme, that additional economic impacts are not anticipated to be material to this assessment outcome.
AHEL-010	Landscape and Visual	Mitigation	4. Contradiction of Stated Benefits and Community Interest The developer's claims of environmental harmony are contradicted by the scale of the proposal and its impacts. · Industrialising 878 hectares of countryside cannot be reconciled with "*responsible land use*" or preserving the area's character.	The Scheme has been designed to deliver the greatest possible benefit from the available land and the available grid connection, whilst avoiding, minimising and/or mitigating harmful environmental effects. The total area within the DCO Order Limits encompasses approximately 1,237 hectares (ha). Of this, the 'Solar PV Sites' comprise approximately 749.1 ha of land. Around 479.5 ha of this land is proposed as being required for installation of solar PV, battery storage, and associated infrastructure. The remaining 269.5 ha would provide areas

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				dedicated to ecological mitigation, measurable Biodiversity Net Gain (BNG) delivery, landscaping, offsets and agricultural land managed for environmental enhancement and habitat creation. The Applicant remains committed to delivering a Scheme that makes a meaningful contribution to the UK's transition to net zero, while also seeking to minimise adverse impacts and maximise opportunities for environmental enhancement and community benefits.
AHEL-011	Description and DCO Process	Adverse Impacts on Local Community	The project appears to prioritize national energy targets without proper regard for the "*significant adverse impacts*" on the local community and economy, as identified by the local planning authority.	The Applicant is confident that the assessment of socio-economic effects in **ES Volume 1 Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** and to human health and wellbeing in **ES Volume 1, Chapter 18: Human Health [APP-070]** robustly and proportionately set out the likely significance of effects on the economic and social environment as a result of the Scheme. The Applicant is therefore confident that the Scheme has no significant adverse effects to employment, economic prosperity, or to community wellbeing at any phase of the Scheme.
AHEL-012	Description and DCO Process	Conclusion	Conclusion For the reasons stated above, I urge the Examining Authority to recommend that the Secretary of State refuse this application. The Lime Down Solar Park, in its proposed form and location, would cause irreparable harm to my livelihood, the safety of my clients and animals, and the rural economy and character of the area,	The Applicant is confident the Scheme has no significant effect to this equestrian facility and business, nor to the wider rural economy.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			outweighing any claimed benefits. Yours faithfully, Alicia Hawker Eventing Ltd (Redacted)	

4.24 St Mary and St Ethelbert Church PCC

Table 4-24 RR-4431

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
SMSECPC C-001	Description and DCO Process	Introduction	Our church has concerns about the impacts of this project. The area of this project lies within the Gauzebrook Group of Churches, a benefice of eight churches which are spread between Sherston in the north and Hullavington and Stanton St Quintin in the South. All residents of the Parish of Luckington are entitled to be baptised, married and have their funeral in our Church. We provide regular services, not only to our own Parish, but also in a shared mode with the other 7 churches in the benefice.	The Applicant notes this comment and responds to the various concerns in turn below.
SMSECPC C-002	Cultural Heritage	Introduction	The Church building is Grade 1 listed, and therefore of the highest level of heritage.	The Applicant notes this comment.
SMSECPC C-003	Transport and Access	Transport Links and Connectivity	The project works will impact on the transport links between these churches, hindering physical communication between the churches and the quality of the area, which is attractive to many visitors, including those visiting our churches.	No construction routes directly pass any of the churches. Construction vehicle routes are presented in ES **Volume 2, Figure 13-6 and 13-7 [APP-151 – APP-152]** and **ES Volume 2, Figures 13-1 and 13-2 [APP-146 – APP-147].** The construction phase is temporary and during operation vehicle trips will be nominal with no or very occasional HGVs.
SMSECPC C-004	Socio-Economics, Tourism and Recreation	Heritage Assets	The Athelstan Pilgrim Way based on the historical context of King Athelstan links these churches and draws many visitors. Our church is grateful to many visitors who support our churches through donations made by them during their visit.	The Grade I Listed Church of The Holy Cross (NHLE: 1023223) is situated approximately 720m north of Lime Down A at its nearest points. Since the design presented at PEIR stage, Solar PV Panels have been removed entirely from within Fields A11 and A12, and from within the northern parts of Fields A1 and A4. No significant effects have been identified as a result of the Scheme to the Church of The Holy Cross (see **ES Volume 1, Chapter 12: Cultural**

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			All changes to the local environment will impact us, the rural nature of the local area changing to an industrial area will be adverse. The area is highly regarded for walking and cycling. The Church is on the Macmillan Walking Way and we take part in a major annual fund raising event called 'Wiltshire Historic Churches Ride and Stride' which is held annually across the area and into adjacent counties.All changes to the local environment will impact us, the rural nature of the local area changing to an industrial area will be adverse. The area is highly regarded for walking and cycling. The Church is on the Macmillan Walking Way and we take part in a major annual fund raising event called 'Wiltshire Historic Churches Ride and Stride' which is held annually across the area and into adjacent counties. Downgrading the attractiveness of this area will reduce the footfall and hence our fundraising capability.	**Heritage [APP-064]**, supported by **Volume 3, Appendix 12.1: Heritage Statement [APP-219]**). Public rights of way such as bridleways and byways and the use of the highway network for recreational users have been considered as specific recreational receptors in the assessment in the **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]**. The likely effects on individual PROWs are specifically assessed in **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]**. This assessment covers each phase of the Scheme: construction, operation, peak replacement works, and decommissioning, and is based on likely visual and amenity impacts, traffic movements, and changes to the usability and desirability of PROWs. The Applicant confirms that the majority of significant adverse effects can be mitigated, however understands that some significant adverse effects to users of routes in Lime Down E cannot be mitigated further during construction. No significant residual effects are anticipated during the operational phase of the Scheme. The Applicant has committed to ensuring the operation or recreational use of PROWs is protected as much as possible through the implementation of embedded and additional mitigation measures set out in the **OCTMP [APP-287]** and **OPROWPPMP [APP-282**], secured respectively by Requirements 15 and 16 in Schedule 2 to the **Draft DCO [APP-016]**. The Applicant is confident therefore that the Scheme would not cause significant detriment to the ability for The Wiltshire Historic Churches Ride and Stride to take place or continue fundraising in future.
SMSECPCC-005	Soils and Agriculture	Stewardship of Farmland	We are also concerned with the aspects of stewardship of the	The potential effects of the Scheme on agricultural land are assessed in **ES Volume 1, Chapter 17: Soils and**

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			farmland. If this project proceeds it sets a poor precedent for encouragement proper use of our natural resources for food.	**Agriculture [APP-069]**, which considers baseline agricultural land use and quality and evaluates likely effects during construction, operation and decommissioning. The assessment confirms that the Scheme will result in a temporary and reversible loss of agricultural land during the operational period, with all land to be returned to its original use and condition as far as practicable following decommissioning. No permanent loss of agricultural land is anticipated. The Applicant does not consider that food security will be compromised by the Scheme (or solar energy more widely). The latest figures to September 2024 indicate that solar occupied around 21,200 ha of agricultural land in the UK. In 2025, 545,000 ha of arable land in England were left uncropped (source: Department for Environment, Food & Rural Affairs, Agricultural land use in England at 1 June 2025).It should also be noted that food security is not identified as an issue within the suite of Energy National Policy Statements or the National Planning Policy Framework (NPPF). Further, the Government's UK Solar Roadmap (2024) states that solar development is not considered to compromise food security, and that climate change itself poses the greatest long-term risk to food production - a risk which the Scheme directly helps to address by providing a secure, low-carbon source of electricity. Post-decommissioning of the Scheme, the landowners would choose how the land is to be used and managed, the landowner may return all of the land to arable use, although it is likely that established habitats such as hedgerows and woodland would be retained given their potential benefits to agricultural land and the wider farming estate. Whilst there is

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				an environmental and economic cost to importing food, and it is recognised the UK imports a far greater amount of food than it exports, the impact of the Scheme on food import requirements or the food and drinks economy is not material at a national scale and has therefore not been assessed.

4.25 South Cotswolds Liberal Democrats

Table 4-25 RR-4430

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
SCLB-001	Description and DCO Process	Introduction	This representation is submitted on behalf of the South Cotswolds Liberal Democrat Local Party. The South Cotswolds Liberal Democrats wish to express their opposition to the proposed Lime Down Solar Park development. The South Cotswolds Liberal Democrats supports the expansion of renewable energy generation and recognises the urgent need to address climate change. Solar power will play an important role in meeting national and local net zero targets. However, support for renewable energy does not remove the need for schemes to be appropriately located, proportionate in scale, policy-compliant, and supported by robust evidence and effective mitigation. For the reasons set out below, the Lime Down Solar Park proposal represents the wrong development in the wrong place, and its harms currently outweigh its benefits.	The Applicant confirms that these matters have been addressed in detail in the responses below.
SCLB-002	Site selection and Alternatives	Scale, Location and Landscape Harm	Scale, Location and Landscape Harm The proposed development is of an exceptional scale, comprising approximately 3056 acres including 1850 acres of solar PV arrays and a	The Scheme has been designed to deliver the greatest possible benefit from the available land and the available grid connection, whilst avoiding, minimising and/or mitigating harmful environmental effects. An assessment of landscape and visual effects is provided in the Landscape and Visual Impact Assessment (LVIA) presented in **ES Volume 1, Chapter 8: Landscape and**

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			22km cable route corridor, with an operational lifespan of up to 60 years. Its scale and dispersed nature would result in long-term industrialisation of a sensitive rural landscape. The site lies close to the Cotswolds National Landscape, and the proposal would cause substantial and enduring harm to landscape character, settlement settings, and long-distance views. As Wiltshire Council has identified, the scale of the scheme makes compliance with landscape protection policies extremely difficult, if not impossible. The magnitude of change would fundamentally alter the character of the countryside that defines the South Cotswolds.	**Visual [APP-060]**. The LVIA assesses effects on identified landscape and visual receptors, including residential properties and users of public rights of way, and identifies where significant effects may occur. The LVIA recognises that there would be temporary Moderate Adverse effects on Landscape Character within the 1 km as a result of the change in land use from arable farmland to solar infrastructure. However, the Scheme proposes significant mitigation measures informed by Wiltshire's Nature Recovery Strategy to reduce the effects of the Scheme on landscape character which will provide significant beneficial effects to the fabric of the Sites and the legacy Landscape. As per the description set out in **ES Volume 1, Chapter 3: The Scheme [APP-055]** the total area within the DCO Order Limits encompasses approximately 1,237 hectares (ha). Of this, the 'Solar PV Sites' comprise approximately 749.1 ha of land. Around 479.5 ha of this land is proposed as being required for installation of solar PV, battery storage, and associated infrastructure. The remaining 269.5 ha would provide areas dedicated to ecological mitigation, measurable Biodiversity Net Gain (BNG) delivery, landscaping, offsets and agricultural land managed for environmental enhancement and habitat creation. The Applicant remains committed to delivering a Scheme that makes a meaningful contribution to the UK's transition to net zero, while also seeking to minimise adverse impacts and maximise opportunities for environmental enhancement and community benefits. An assessment of landscape and visual effects is provided in

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				the Landscape and Visual Impact Assessment (LVIA) presented **in ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**. The LVIA assesses effects on identified landscape and visual receptors, including residential properties, users of public rights of way and designated landscapes such as the Cotswolds National Landscape (CNL), and identifies where significant effects may occur. The CNL is also fully assessed as a standalone receptor within **ES Volume 3, Appendix 8.6: Assessment of Effects on the Cotswolds National Landscape and its Special Qualities [APP-197].** This assessment considers the effects of the Scheme on landscape character, visual amenity and the special qualities of the CNL, including tranquillity. The LVIA found no Significant Long Term Visual Effects to Residential Properties as a consequence of the Scheme. The scale of development within the Order Limits has been significantly reduced from the layout assessed in the Preliminary Environmental Information Report (PEIR) through an iterative design process undertaken in response to consultation and in accordance with the mitigation hierarchy to avoid, reduce and mitigate adverse effects, including effects on the CNL and its setting. As part of this design evolution, panels along the edge of the Cotswolds CNL and along the Fosse Way have been removed. Panels along the edge of the CNL were also removed from the Order Limits in fields C2, C3 and C4 where significant visual effects on receptors within the CNL were identified. Panels were also removed from fields C1, C6, C8, the western section of C9 and the majority of C10, with this land now proposed for ecological mitigation to protect the setting of the CNL. In addition, panels within fields A11 and A12 were removed and

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				the land repurposed for ecological mitigation to protect the setting of the CNL towards Sherston. All land parcels adjacent to the CNL are proposed to deliver habitat enhancement, informed by the CNL Management Plan and the Cotswolds National Landscape Strategy and Guidelines, to further the purposes of the designation. Mitigation measures to address landscape and visual effects, including effects on the CNL and its setting, are set out **in ES Volume 1, Chapter 8: Landscape and Visual [APP-060],** Figure 3-4-1 to 3-4-5.2 **Landscape and Ecology Mitigation Plan [APP-084]** and detailed within the **Outline Landscape and Ecological Mitigation Plan (OLEMP) [APP-283]** and the **Outline Ecological Protection and Mitigation Strategy (OEPMS) [APP-284].** These documents include proposals for new and enhanced planting, retention of existing hedgerows and woodland, and landscape integration measures to reduce visual effects over time. In addition, the Scheme design incorporates minimum offsets from existing landscape features, including residential properties, ancient woodland, woodland, hedgerows, public rights of way and watercourses, to further limit visual impacts and protect the setting of the CNL. Details of the proposed landscape and ecological mitigation and enhancement measures are also provided in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060], Figure 3-4-1 to 3-4-5.2 Landscape and Ecology Mitigation Plan [APP-084], the Outline Landscape and Ecological Management Plan (OLEMP) [APP-283],** and the **Outline Ecological Protection and Mitigation Strategy (OEPMS) [APP-284].** The preparation, approval and implementation of detailed landscape and ecological management plans, substantially in

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				accordance with the **OLEMP [APP-283],** is secured through Requirement 7 in Schedule 2 of the **Draft Development Consent Order [APP-016]**. The preparation, approval and implementation of the detailed Ecological Protection and Mitigation Strategy, substantially in accordance with the **OEPMS [APP-284],** is secured through Requirement 8 in Schedule 2 of the **Draft Development Consent Order [APP-016].** These requirements ensure that the identified mitigation and enhancement measures are delivered and maintained throughout the lifetime of the Scheme.
SCLB-003	Cumulative and In-Combination Effects	Assessment of Cumulative Impacts	Cumulative impacts, including the interaction of multiple solar sites and the cable route corridor, have not been robustly or transparently assessed. Embedded mitigation measures, such as hedgerows and buffers, lack clear justification in relation to baseline landscape character and may themselves introduce further harm.	Details on how the design of the Cable Route Corridor has evolved and been designed can be found **in ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP-056]**. Several factors were considered in order to take a direct route whilst following existing features, such as roads, and avoiding sensitive receptors as far as practicable, such as habitat designations, residential and commercial properties, heritage assets, and a large number of land interests. The assessments set out in the various chapters of the **ES [APP-052 to APP-265]** detail what impacts are expected as a result of the Scheme based on the minimum and maximum parameters of the Scheme, and the mitigation and enhancement measures that are proposed to reduce these impacts. A comprehensive Cumulative and In-Combination Effects Assessment has been undertaken in accordance with Planning Inspectorate Advice Note 17 and the relevant NPS EN-1, NPS EN-3 and NPS EN-5 requirements which are set out within **ES Volume 1, Chapter 21 Cumulative and In-combination Effects [APP-073] and associated**

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				Appendices [APP-264]. Interaction with proposed or consented but not yet built developments has been fully explored within each of the technical assessments **[APP-059 - APP-072]** with a summary of each of these assessments provided within **ES Volume 1, Chapter 21 Cumulative and In-Combination Effects [APP-073].** Existing schemes are captured within the baseline environment for each technical assessment. The four stage cumulative assessment methodology is described within **ES Volume 1, Chapter 6 EIA Methodology [APP-058].** 358 developments were included in the **Long List [APP-264].** 41 developments are included in the short list (and are therefore assessed) including a number of proposed solar and BESS developments. The list of developments included in the cumulative assessment was reviewed and developed in consultation with Wiltshire Council. Taking a conservative worse case approach, significant cumulative effects are identified at a limited and discrete number of receptors comprising tourism and recreation impacts during the construction phase on Corsham Park, PRoW WT|CORM|122, long path and Sustrans Cycle Route 403, and on skylark at a District level. Buffers are areas of open space to provide an off sett from existing landscape features such as trees, hedgerows and woodlands. These buffers are predominantly proposed as margins of wildflower meadow and in places as native scrub. All existing hedgerows would be enhanced by gapping up and where required to provide visual screening of infrastructure they would be allowed to grow to a height of 4m, or be maintained at their current height if already greater than 4 m.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				The Scheme has been designed to be sympathetic to local character and setting having been informed by the Landscape Character Assessment Guidelines set out in **ES Volume 3, Appendix 8-4 [APP-195]** and Wiltshire's Nature Recovery Strategy to protect and enhance the landscape through the landscape- led design. It is recognised that low hedges are a characteristic feature of the landscape. However, it is noted that not all of Wiltshire's hedgerows are maintained to a low height and this change would not be significant or permanent as hedgerows could be clipped low again following decommissioning.
SCLB-004	Description and DCO Process	Incomplete Assessment and Unresolved Impacts Idenitified by Wiltshire Council	Incomplete Assessment and Unresolved Impacts Wiltshire Council, as the host authority, has identified significant gaps in the application, including unresolved construction methodologies, access arrangements, and insufficiently defined mitigation. Of particular concern are substantial gaps in ecological survey data, especially along the cable route corridor, including limited or absent surveys for bats, birds, and protected species. Without this information, it is not possible to conclude that impacts on biodiversity and designated ecological sites can be adequately mitigated. The absence of secured, enforceable and detailed mitigation strategies undermines confidence that the scheme can	The Applicant has reviewed Wiltshire Council's Relevant Representations and provided detailed responses to all matters raised. The Applicant acknowledges that some areas within the Cable Route Corridor had not been subject to ecological survey at the point of finalising **the ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061].** Since the preparation of the Chapter, habitat surveys have now been completed across all previously un-surveyed areas. The survey methodology applied was consistent with that reported in **the ES Volume 3, Appendix 9-1: Ecological Baseline Report [APP-198]** for the rest of the CRC. The results of these surveys have been reviewed and, in the Applicant's view, do not alter the conclusions of **ES Volume 1, Chapter 9 [APP-061]** regarding likely significant effects. The precautionary assumptions previously applied in the ES were conservative and appropriately accounted for any uncertainty associated with un-surveyed areas. The Applicant has updated **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]** and provided a revised version at Deadline 1 with the findings of these surveys, and it is considered these do not materially change the assessment of

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			comply with local and national planning policy.	likely significant effects presented in the chapter. The scope of ecological and species-specific survey within the Cable Route Corridor was defined using a proportionate, risk-based approach. Survey scope and effort across the Order Limits were targeted to areas and features where there was a reasonable likelihood of significant effects, rather than applied uniformly across the Order Limits irrespective of risk. The assessment has had regard to the short-term, temporary and construction-phase nature of works within the Cable Route Corridor, the absence of permanent operational effects, and a robust appraisal of habitat suitability for species based on baseline habitats data collected through surveys. Based on this that a reduced survey effort within the Cable Route Corridor has been undertaken compared to the Solar PV Sites. Potential impacts within the Cable Route Corridor, including temporary habitat loss, disturbance and fragmentation, have been assessed on a precautionary reasonable worst-case basis. This assumes that construction works within the Cable Route Corridor will be progressive over the approximate 18-month period. Embedded mitigation and further controls secured through the **Outline EPMS [APP-284],** including pre-construction surveys and inspections, micro-siting of cabling works, appointment of an Ecological Clerk of Works and species-specific protection measures, where appropriate, provide a recognised mechanism for managing residual risk. Furthermore, reinstatement of any disturbed habitats will take place as a priority following construction within the Cable Route Corridor. The Applicant does not agree that the survey approach

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				means that impacts and adequate mitigation cannot be adequately concluded. The baseline information is considered sufficient to support a robust and proportionate assessment of likely significant effects within the Cable Route Corridor, and the conclusions of **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]** remain appropriate and justified.
SCLB-005	Soils and Agriculture	Agricultural Land, Food Security and the Rural Economy	Agricultural Land, Food Security and Rural Economy The scheme would remove approximately 878 hectares of land from food production, including a significant proportion of best and most versatile agricultural land. This equates to the loss of thousands of tonnes of crops annually over several decades. At a time of increasing concern over food security and domestic agricultural resilience, the long-term loss of productive farmland for large-scale energy infrastructure is difficult to justify, particularly when alternatives such as brownfield land, rooftops, and lower-quality land remain underutilised.	The potential effects of the Scheme on agricultural land are assessed in **ES Volume 1, Chapter 17: Soils and Agriculture [APP-069],** which considers baseline agricultural land use and quality and evaluates likely effects during construction, operation and decommissioning. The assessment confirms that approximately one-third of the agricultural land within the Solar PV Panel Areas is BMV quality, mostly in Subgrade 3a which is the lowest of the BMV grades, and approximately two-thirds is non-BMV in Subgrade 3b and Grade 4. An appraisal of alternative sites is presented in **ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP-056]** and **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]**. This assessment considered alternative sites within a 20 km radius of the existing National Grid Melksham Substation and concludes that there are no more suitable locations within the defined search area than the proposed Site. The Site Selection Assessment explains how brownfield land, industrial land, previously developed land and lower-grade agricultural land were considered in accordance with policy. Government led agricultural initiatives, such as the Sustainable Farming Incentive which is relaunching later in 2026, have prioritised soil health,

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				environmental enhancement and climate resilience, recognising that long-term food security is influenced by a range of factors beyond land take alone, including soil condition, climate change and environmental pressures. The Scheme allows soils to remain in situ and undisturbed during operation, supporting soil recovery and long-term land health, with land reinstated and returned to agricultural use as far as practicable following decommissioning. No permanent loss of agricultural land is anticipated. The Applicant does not consider that food security will be compromised by the Scheme (or solar energy more widely). The latest figures to September 2024 indicate that solar occupied around 21,200 ha of agricultural land in the UK. In 2025, 545,000 ha of arable land in England were left uncropped (source: Department for Environment, Food & Rural Affairs, Agricultural land use in England at 1 June 2025). It should also be noted that food security is not identified as an issue within the suite of Energy National Policy Statements or the National Planning Policy Framework (NPPF). Further, the Government's UK Solar Roadmap (2025) states that solar development is not considered to compromise food security, but that the climate and nature crisis poses the greatest long-term risk to food security - a risk which the Scheme directly helps to address by providing a secure, low-carbon source of electricity. As set out in Section 2 of the **Outline Decommissioning Strategy [APP-279],** post-decommissioning of the Scheme, the landowners would choose how the land is to be used and managed. The landowner may return all of the land to arable use, although it is likely that established habitats such as hedgerows and woodland would be retained given their

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				potential benefits to agricultural land and the wider farming estate.
SCLB-006	Socio-Economics, Tourism and Recreation	Local Economy and Employment	Wiltshire Council has also identified adverse impacts on the rural economy, including farming and tourism employment, and a reduction in tourism spending. These long-term economic harms weigh against the limited local economic benefits offered by the scheme.'	The Applicant has responded directly to comments made by Wiltshire Council **[RR-4934]** in respect of impacts on the rural economy within the Applicant's response to paragraphs 18.6 – 18.12. The Applicant is discussing the approach to assessment of tourism impacts with Wiltshire Council's Economic and Regeneration Team and those discussions will be set out in the Statement of Common Ground with Wiltshire Council to be submitted at Deadline 1. The Applicant has provided a robust assessment of impacts to tourism and recreation, and to agricultural employment in **ES Volume 1 Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]**. While employment and economic losses to the agriculture and tourism industries have been identified, the Applicant furthermore reiterates that these impacts are worst-case estimates based the likely significance of effects from the Scheme, and do not include for additional mitigation measures being applied. These impacts are not considered significant, with the peak impacts during construction accounting for approximately 0.17% of tourism employment across Wiltshire (29,000 estimate from Visit Wiltshire, 2021) and the long-term impact to agriculture less than 0.29% of agricultural employment in Wiltshire (BRES, 2023). Additional mitigation measures have been secured through the **OCTMP [APP-287]**, **OPROWPPMP [APP-282]** and the **OSSCEP [APP-285]**. Together these seek to reduce these losses to agriculture and tourism through mitigating traffic impacts, impact to PROWs, and focussing on local recruitment, promoting local

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				suppliers where practicable, and through providing retention and retraining opportunities for workers in agriculture and tourism-dependent industries. These measures are secured by the relevant requirements in Schedule 2 to the **Draft DCO [APP-016]**. The Applicant also seeks to highlight that these adverse effects do not outweigh the beneficial employment and economic effects anticipated during construction, replacement works, and decommissioning. During operation, economic benefits from the Scheme are recognised to be more modest and limited in scope. However, enhancement measures through the **OSSCEP [APP-285]** to improve local employment opportunities have not been included in these calculations, nor have potential community benefits financed through the Community Benefit Fund been included in the DCO (as it is agreed through a separate process).
SCLB-007	Climate change and Energy Need	Carbon Balance and Climate Considerations	Carbon Balance and Climate Considerations While the proposal would deliver long-term carbon savings, Wiltshire Council's assessment highlights substantial construction-phase emissions, with carbon break-even not achieved until several decades into the project's lifespan. This raises important questions about the timing of benefits relative to immediate environmental, social and economic harm. True sustainability requires that climate benefits are delivered without disproportionate damage to	It is agreed that the Scheme will deliver long term carbon savings and the Scheme must be considered in the planning balance with a view of other potential environmental factors. It is not clear how the conclusion that the 'carbon break-even' would not occur until several decades into the project has been reached. **ES Volume 1 Chapter 7: Climate Change [APP-068]** demonstrates that the development has a net beneficial effect **ES Volume 1 Chapter 7: Climate Change [APP-059]** concludes that the emissions from construction will be offset by savings from the Scheme in comparison to a 'without Scheme' scenario.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			landscapes, communities and local economies. In this case, the balance has not yet been demonstrated.	
SCLB-008	Other Environmental Matters	Safety, Infrastructure and Community Impact	Safety, Infrastructure and Community Impact The inclusion of large-scale Battery Energy Storage Systems (BESS) introduces additional safety and public protection considerations. While incidents may be infrequent, the consequences of failure could be severe, particularly given the proximity of infrastructure such as transport corridors and sensitive water environments. These risks must be fully addressed through clear, enforceable design and mitigation, which is currently lacking. Construction and operation of the scheme would place significant pressure on rural road networks, public rights of way, and local amenity. Communities would experience prolonged disruption from construction traffic, noise and altered access, yet the scheme provides no clear or guaranteed local benefits such as reduced energy costs or meaningful community investment.	<u>Battery Storage</u> The location of the Battery Energy Storage System (BESS) has been informed by a detailed site selection and design evolution process, as set out in **ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP-056].** This chapter explains that land at Lime Down D was identified as an appropriate location due to its proximity to the solar PV arrays and the on-site substation, providing operational benefits including minimising transmission losses, maximising storage efficiency, and enabling rapid and reliable grid response. In considering options for co-locating the BESS with the solar PV Sites, Lime Down D was selected as the preferred location due to its central position within the Scheme, effective natural and proposed screening, limited proximity to residential properties, and closeness to existing infrastructure corridors, including the railway line. Locating the BESS within an existing infrastructure corridor reduces the need for additional land take and avoids introducing new isolated infrastructure into undeveloped areas. The assessment concludes that siting the BESS at Lime Down D presents the lowest potential for significant adverse environmental effects. Accordingly, the proximity of the BESS to the railway line does not give rise to significant safety or environmental concerns. The Applicant has followed National Fire Chiefs Council

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				(NFCC) guidance and commissioned a Plume Assessment Study to model toxic gas emissions and visibility impacts from a BESS fire on all sensitive receptors within a 1km radius of the BESS area. Six worst case BESS fire locations (i.e. locations within the BESS Area closest to sensitive receptors) have been modelled as depicted in **ES Volume 2, Figure 15-5: Battery Energy Storage System Fire Emissions Study Area [APP-166].** The Concentrations of carbon monoxide (CO), formaldehyde, hydrogen chloride (HCl), hydrogen cyanide (HCN), hydrogen fluoride (HF), ammonia (NH_3), nitrogen dioxide (NO2) and particulates from a potential BESS fire have been modelled using an air quality dispersion model to determine the likely effects on human health. A high-level visibility assessment has also been undertaken using the modelled particulates results to determine the effect of BESS fire emissions on visibility on the local road and rail network to inform the **Outline Battery Safety Management Plan (OBSMP) [APP-286].** The Plume Assessment Study has concluded that there are no significant toxic emission or visibility impacts at all sensitive receptor locations. The Applicant has also committed to commissioning an additional Plume Analysis Study at the detailed design stage as stipulated in Section 5.5.9 of the OBSMP and secured through Requirement 6 of the **draft DCO [APP-016]:** "*..at the detailed design stage a BESS system and site specific Plume Analysis study will be conducted to assess the environmental impact of a site incident to sensitive receptors within a 1 km radius. Toxic gas emissions to sensitive receptors must be*

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				below relevant public health exposure limit guidelines when the battery system of a BESS is fully consumed (burnt out), production of Particulate Matter (PM) and a visibility impact assessment on any transport links within a 1 km radius of the BESS area will also be included. The ERP produced at the detailed design stage (template outlined in Section 5.4.4) will incorporate all necessary emergency response procedures and actions based upon thermal runaway test data supplied by the BESS system provider." The Applicant is discussing the approach to BESS safety with Dorset & Wiltshire Fire & Rescue Service (D&WFRS), and this discussion is set out in the relevant Statement of Common Ground to be submitted at Deadline 1. Potential effects of the Scheme on water quality and contamination risk are assessed in **ES Volume 1, Chapter 11 Hydrology, Flood Risk and Drainage [APP-063]**, which considers pollution pathways to surface water and groundwater during both construction and operation. The Scheme incorporates sealed and isolatable drainage principles for the BESS and substations to ensure that operational spillages or firewater can be contained and managed without discharge to the surrounding environment. In the event of an incident, drainage isolation measures allow potentially contaminated water to be retained on site and tested prior to any controlled release or removal by a licensed waste contractor. These principles are consistent with the approach described in the **OBSMP [APP-286]** and will be further developed through the detailed drainage design secured through the DCO discharge process. The Applicant is discussing the approach to pollution

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				resulting from battery fire is under discussion with both the Environment Agency and the Lead Local Flood Authority (LLFA) and this discussion is set out in the relevant Statements of Common Ground to be submitted at Deadline 1. Mitigation measures to control contamination risk during construction are set out in the **Outline Construction Environmental Management Plan [APP-277]**. Routine maintenance and panel cleaning will use minimal water and no detergents or chemical cleaning agents, in line with industry standards and best practice, so there is no expected risk from cleaning runoff. In addition, the removal of agrichemical inputs through the cessation of farming activities will further reduce contamination risks compared to existing use. The preparation, approval and implementation of a Construction Environmental Management Plan substantially in accordance with the **Outline Construction Environmental Management Plan [APP-277]** is secured through Requirement 13 in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that construction works are carried out in accordance with the approved CEMP and that contamination risks are appropriately managed throughout construction of the Scheme. The Applicant considers that this approach to assessment and mitigation is appropriate and robust. <u>Construction Traffic</u>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				The capacity of local roads and infrastructure to accommodate construction vehicles is assessed in **ES Volume 1, Chapter 13: Transport and Access [APP-065]**, which considers construction traffic volumes, vehicle types, route suitability and network performance. The assessment concludes that, with appropriate mitigation in place, there would be no significant adverse impacts on the local highway network. Supporting technical information is provided in **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233],** which identifies specific locations where traffic management measures or passing arrangements may be required on narrower sections of construction routes. The assessment presented in Annex H of **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]** demonstrates adequate carriageway width or frequency of passing place opportunity to pass at least an HGV and a light vehicle as requested in comments provided by WC. All construction routes also include passing points to allow two HGVs to pass. Mitigation measures to manage construction traffic are set out in the **Outline Construction Traffic Management Plan (CTMP) [APP-287]** . The CTMP is designed to minimise the effects of construction traffic on local roads and includes measures for vehicle routing, delivery scheduling and liaison with the local highway authority. The preparation, approval and implementation of the detailed CTMP, substantially in accordance with the outline CTMP, are secured through Requirement 15 of Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				construction traffic impacts on local roads and infrastructure are appropriately managed throughout the construction phase of the Scheme. Operational Traffic The operational period is for up to 60 years. During the operation and maintenance phase, there are anticipated to be around five visits to each Solar PV Site per month for maintenance purposes. These would typically be made by light van or 4 x 4 type vehicles. There will be occasional trips to the proposed habitat areas within the Solar PV Sites for operational and maintenance purposes. These would typically be made by light van or 4 x 4 type vehicles and will use the existing field access locations detailed in Table 3-5 of **ES Volume 1, Chapter 3: The Scheme [APP-055] shown in ES Volume 2, Figure 13-13: Operational Only Access Locations: Solar PV Sites [APP-158].** Vehicle trip generation associated with these access locations will be the same or lower than the existing agricultural use There will be no transport operation effects associated with the installed Grid Connection Cables (within the Cable Route Corridor) as they will be located underground. Access may be required for maintenance, but this is only likely once or twice a year In light of this, effects on severance, driver delay, NMU delay and amenity, road safety and hazardous loads during the operation and maintenance phase of the Scheme are considered to be negligible or not significant. The effects will be long-term, as the design life of the Scheme is anticipated to be 60 years.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				Noise The noise and vibration impacts arising from construction activities are assessed in Section 14.10 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**, with supporting technical information provided in **ES Volume 3, Appendix 14-4: Noise Modelling [APP-237]**. For the purposes of the assessment, a reasonable worst-case scenario assuming piling activities has been considered. The Applicant notes that the approach to construction noise and vibration has been discussed with Wiltshire Council, as described in Section 14.2 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**. Mitigation measures associated with construction activity are presented in Section 14.9 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]** and are committed to through the **Outline Construction Environmental Management Plan [APP-277]**. With these measures in place, the assessment concludes that no significant effects from construction noise or vibration are expected. A noise monitoring programme agreed with Wiltshire Council will be carried out during construction. The preparation, approval and implementation of the Construction Environmental Management Plan, substantially in accordance with the **Outline CEMP [APP-277]**, are secured through Requirement 13 in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that construction noise and vibration are appropriately controlled throughout the construction phase of the Scheme.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				Public Rights of Way and Local Amenity A detailed assessment of the likely significance of effects from the Scheme on the use and desirability of individual PRoW, and recreational access to the countryside, has been included in the **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** and **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]**. This assessment considers the impact on individual recreational routes – be that practically in their use, and their enjoyment and desirability. The Applicant confirms that the majority of significant adverse effects can be mitigated, however understands that some significant adverse effects to users of PROWs and unsurfaced roads in Lime Down E cannot be mitigated further during construction. No significant residual effects are anticipated during the operational phase of the Scheme. The Applicant is discussing the assessment of PROW impacts and mitigation with Wiltshire Council's Countryside Access Team and this discussion is set out in the Statement of Common Ground with Wiltshire Council to be submitted at Deadline 1. The Applicant confirms that existing PRoW are to be protected as far as practicable within the Scheme design with PRoW management strategies set out in the **Outline Public Rights of Way and Permissive Paths Management Plan (PROWPPMP) [APP-282]**. These are confirmed as embedded mitigation measures in Section 16.9 of **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]**. New permissive access routes have been included in the

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				Scheme design, shown as Work No.10 on the **Works Plan [APP-007]** and shown on **ES Volume 2, Figure 3-4: Landscape and Ecology Mitigation Plan [APP-283]**. These are considered as additional mitigation and enhancement measures in Section 16.11 of **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]**. The preparation, approval and implementation of the PRoW and Permissive Paths Management Plan is secured through Requirement 16 of Schedule 2 of the **Draft DCO [APP-016]**. The preparation, approval and implementation of the detailed CEMP and CTMP, substantially in accordance with the relevant outline plans, is secured through Requirements 13 and 15 respectively in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that impacts on PRoW and recreational routes are appropriately managed during construction. <u>Local Benefits</u> The Applicant acknowledges that any adverse effects from the Scheme are more likely to be felt locally compared with the largely wider-scale benefits of the Scheme. The Scheme is anticipated to help meet the UK's net zero requirements for energy production, which is considered a critical national priority and set out in National Policy Statements for Energy NPS EN-1 (section 4.2) and EN-3. This therefore will benefit the national population as well as the local population. The Scheme is also anticipated to benefit the population within approximately 20km of the Scheme, through providing employment and income especially during construction and

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				peak replacement activities (as assessed in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]**), and providing skills and training opportunities (as secured through the **OSSCEP [APP-285]** through Requirement 18 of Schedule 2 to the **Draft DCO [APP-016]**). Where the Scheme is anticipated to benefit local people more specifically, this is done through providing onsite permissive paths to increase access to the countryside, providing improved landscape planting through reinforcing existing hedgerows and planting of new trees, providing biodiversity net gains through habitat improvements. This is secured through the **OLEMP [APP-283]** and **OPROWPPMP [APP-282]** through Requirements 7 and 16 of Schedule 2 to the **Draft DCO [APP-016]**. That notwithstanding, the Applicant is committed to providing a Community Benefit Fund to allow for community-driven benefits that are not necessarily associated with the Scheme itself. The purpose is to establish a means to recognise local community needs that the Applicant wants to be able to contribute towards in recognition of the local impact of the Scheme.
SCLB-009	Description and DCO Process	Democratic Opposition and Community Confidence	Democratic Opposition and Community Confidence Wiltshire Council has formally concluded that it does not support the proposal as submitted. This position is supported by parish councils, local communities and the Member of Parliament for South	The Applicant confirms that these matters have been addressed in detail in the responses to **RR-4430**.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			Cotswolds,(Redacted). This level of consistent local opposition reflects genuine concern about the scale, impacts and long-term consequences of the scheme. While the Nationally Significant Infrastructure Projects regime allows decisions to be taken at a national level, the planning balance must still give appropriate weight to local impacts, democratic representation and community confidence. Conclusion The South Cotswolds Liberal Democrats support renewable energy and recognises the importance of meeting climate targets. However, this proposal, as currently submitted, fails to demonstrate that its benefits outweigh the substantial and long-lasting harm it would cause to landscape character, ecology, agricultural land, rural economies and community wellbeing. The concerns raised by Wiltshire Council and MP (Redacted) regarding missing information, inadequate mitigation and policy non-compliance are significant and unresolved. When combined with the scale of local opposition and the	

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			absence of meaningful local benefit, the planning balance weighs firmly against the scheme. For these reasons, the South Cotswolds Liberal Democrats urges the Planning Inspectorate to refuse development consent for the Lime Down Solar Park as currently proposed.	

4.26 West Street Farm Farming Partnership

Table 4-26 RR-4893

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
WSFFP-001	Hydrology, Flood Risk and Drainage	Flooding	I object to this project due to the increased flooding risk to the north side of great somerford.	The hydrology, flood risk and drainage assessment concludes that the Scheme would not increase flood risk beyond the Order limits, including to communities such as Great Somerford. This conclusion is set out in **ES Volume 1, Chapter 11 Hydrology, Flood Risk and Drainage [APP-063],** supported by the Flood Risk Assessment and Drainage Strategy which demonstrates that runoff rates and volumes would be controlled to prevent off site effects. On this basis, the assessment does not identify an increased flooding risk to the north side of Great Somerford arising from the Scheme.
WSFFP-002	Hydrology, Flood Risk and Drainage	Flooding	I object to this project due to the flooding it will cause in Chippenham. In the winter of 2024 the river rose above the main bridge at the bottom of the high street. This caused significant disruption.	The hydrology, flood risk and drainage assessment concludes that the Scheme would not increase flood risk beyond the Order limits, including to downstream communities such as Chippenham. This conclusion is set out in **ES Volume 1, Chapter 11 Hydrology, Flood Risk and Drainage [APP-063],** supported by the Flood Risk Assessment and Drainage Strategy which demonstrates that runoff rates and volumes would be controlled to prevent off site effects. On this basis, the assessment does not identify the Scheme as a cause of increased flooding in Chippenham.
WSFFP-003	Landscape and Visual	Visual Impact	I object to the industrialisation of this beautiful part of the South Cotswolds.	An assessment of landscape and visual effects are presented in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**. The Landscape and Visual Impact Assessment (LVIA) assesses effects on identified landscape and visual receptors, including residential properties, users of public rights of way and roads, and identifies where significant effects may occur. The LVIA found no significant long term visual effects to residential properties as a consequence of the Scheme. The visual effects of the Scheme are summarised in **ES Volume 3, Appendix 8-3-3 [APP-192]**. Temporary Major/Moderate and Moderate Adverse effects on visual receptors have been recorded across the Scheme during construction and at Year 1. However, for the majority of these receptors, the effects reduce to non –significant levels as

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				a result of the embedded mitigation measures which are set out in Section 8.9 of **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]** and include landscape buffers, retention of existing hedgerows and woodland, and new planting to provide screening and integration over time. The assessment also identifies that there would be some long-term significant effects on the visual amenity of users of some localised footpaths, as a result of the Scheme. This predominantly relates to locations where footpaths diagonally cross fields and mitigation planting would be inappropriate to landscape character and the legacy landscape. Those receptors which would experience Significant Long Term Visual Effects are listed in Table 8-30 of the **LVIA [APP-060].** The scale of development within the Order Limits has been significantly reduced from the layout assessed in the Preliminary Environmental Information Report (PEIR) through an iterative design process undertaken in response to consultation and in accordance with the mitigation hierarchy to avoid, reduce and mitigate adverse effects. As part of this design evolution, panels along the edge of the Cotswolds National Landscape and along the Fosse Way have been removed. Mitigation measures to address landscape and visual effects are set out in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**, **Figure 3-4-1 to 3-4-5.2 Landscape and Ecology Mitigation Plan [APP-084]** and secured within the **Outline Landscape and Ecological Mitigation Plan (LEMP) [APP-283]** and the **Outline Ecological Protection and Mitigation Strategy (EPMS) [APP-284]**. These documents include proposals for new and enhanced planting, retention of existing hedgerows and woodland, and landscape integration measures to reduce visual effects over time. In addition, the Scheme design incorporates minimum offsets from existing landscape features, including residential properties, ancient woodland, woodland, hedgerows, public rights of way and watercourses, to further limit visual

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				impacts. Although these measures reduce the effects of the Scheme on nearly all receptors, as noted above there are 10 receptors which would experience Significant Visual Effects for the duration of the Scheme as set out Table 8-30 of the **LVIA [APP-060]**. Mitigation measures to address landscape and visual effects are set out in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**, **Figure 3-4-1 to 3-4-5.2 Landscape and Ecology Mitigation Plan [APP-084]**. The preparation, approval and implementation of detailed landscape and ecological management plans, substantially in accordance with the **OLEMP [APP-283]** and **EPMS [APP-284]**, are secured through requirements in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that the identified mitigation measures are delivered and maintained throughout the lifetime of the Scheme.

4.27 Sevington Victorian School

Table 4-27 RR-4315

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
SVS-001	Description and DCO Process	Introduction	My name is Lesley Palmer and I am a trustee of Sevington Victorian School, charity registration number (Redacted) I make this submission on behalf of the trustees of the Victorian School and we object to the proposed Lime Down Solar Power and battery storage project.	The Applicant acknowledges this comment and submits that it is confident that the proposed management and mitigation measures set out in the **ES [APP-052 to APP-265]** are comprehensive and robust and that the Scheme aligns with national and local planning policy; this is outlined in the **Planning Statement [APP-267]**. Of particular relevance are Annex A: National Policy Statement Accordance Tables and Annex B: Local Policy Accordance Tables, of the **Planning Statement [APP-267]** which set out an appraisal of the Scheme against the policies.
SVS-002	Socio-Economics, Tourism and Recreation	Impact on Business	Sevington Victorian School, built in 1849 is a perfectly preserved village school room and school teacher's house, together with a garden, wash house and outdoor privy. It is a Grade II* listed building. The purposes of the charity are two fold: to provide an authentic, immersive experience of Victorian school life for children and adults and to conserve the heritage of the school buildings and gardens for future generations to experience. The first of these aims is delivered through a programme of visits for primary schools and adult groups, as well as open events for the general public. The second is managed by the trustees who plan and supervise a programme of repair and maintenance. Visits to the school are conducted on a non-profit making basis. However the income from	Applicant does not consider that the construction of the Scheme will mean that Sevington Victorian School can no longer operate. The access to the Cable Route Corridor on Sevington Lane is anticipated to only be in operation for approximately 90-days during the construction phase with approximately four HGV deliveries per day (1 movement per hour) during the proposed construction times in the **OCTMP [APP-287]**. This will result in a non-material impact on access to Sevington Victorian School. The assessment in **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]** has specifically assessed impact on the Sevington Conservation Area as a visitor destination and as such, the assessment outcomes therein pertain to the Sevington Victorian School. The assessment finds a medium-term temporary moderate-minor adverse effect during construction, predominantly occurring as a result of amenity impacts from the proximity to cabling works. HGV impacts on approach routes do not make a material impact to this assessment. The Applicant seeks to clarify that this effect is anticipated to last only as

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			these visits is vital to ensure that there are sufficient funds to continue to maintain this unique historical asset. Schools come from a wide geographical area. Last year we were visited by schools from Bath & N E Somerset, Bristol, Gloucestershire, North Somerset, South Gloucestershire, Swindon and all areas of Wiltshire. The cable route corridor shown in the submitted plans will severely impact access to the school and will undoubtedly deter schools from booking visits while the construction work is underway. As has been explained the revenue from visits is essential to ensure that the charity continues to operate in the future. Revenue is also generated from adult groups and open days and these will also be affected by the lengthy construction works proposed in the Lime Down application. A quote from an adult group visit encapsulates what is so special about Sevington Victorian School "*An amazing time-capsule of social history and education which must be preserved for posterity*" It would be devastating if the school, which celebrated its 175th Anniversary in 2024, was no longer able to operate. This application must be refused.	long as cable construction activities are occurring within the Sevington area (between the M4 and Park Farm), after which the impacts are neutral for the duration of the Scheme's operational lifetime.

4.28 Roberts Berry Farm

Table 4-28 RR-4027

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
RBF-001	Socio-Economic, Tourism and Recreation	Cable Route Corridor	As far as our business is concerned this project will have a significant negative impact. The chosen route for the cable is incorrect in my view. It should go through the participants land before going through non - interested third parties' land. It will bisect and destroy sections of our ancient pasture land causing significant practical difficulties during construction (access to grazing land on the other side, water etc). It will involve the destruction of mature trees and will damage the drainage.	The Applicant confirms that no agricultural land will be destroyed as a result of the Scheme. The soil handling for the installation of the cables will be managed in accordance with a detailed Soil Resources Management Plan (SRMP). The **Outline SRMP [APP-280]** sets out the broad best practice principles as well as handling windows to minimise effects on soils. The disturbance will be short-term; there will be no resulting access difficulties arising from the short-term cable installation works. Potential effects on local drainage associated with cable installation are assessed and managed through the hydrology, flood risk and drainage assessment, which concludes that the Cable Route Corridor can be constructed without increasing flood risk or causing adverse off site effects when the defined controls are implemented. This is set out in **ES Volume 1, Chapter 11 Hydrology, Flood Risk and Drainage [APP-063]** and the corridor specific assessment in **ES Volume 3, Appendix 11-9 Flood Risk Assessment and Drainage Strategy - Lime Down Cable Route Corridor [APP-218]**. The construction approach includes measures to maintain existing drainage function during works, manage temporary flow routing, and reinstate drainage features and ground levels following installation, with construction controls secured through the construction environmental management framework in **Outline Construction Environmental Management Plan [APP-277]** and detailed method statements subject to approval prior to commencement. On this basis, the Scheme is not expected to result in lasting damage to drainage. The anticipated effects to the farming business affected by cable routing are likely to be temporary and restricted to the

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				width of the Cable Route Corridor. Where fields have been bisected, working practices around cable laying works should allow for access to be maintained to both sides of the Cable Route Corridor to allow for agricultural work to be continued even during construction. The **OCEMP [APP-277]** furthermore commits to the reinstatement of land affected by cabling works as soon as practicable to allow for agricultural work on the land to recommence as usual as soon as construction of that section of cable route is complete. No veteran or ancient trees are proposed to be removed to facilitate the Scheme. The Scheme has been designed through an iterative process to retain existing arboricultural features as far as practicable and to avoid and reduce impacts on trees, groups of trees and woodland. Potential impacts on arboriculture are fully assessed in **ES Volume 1, Chapter 10: Arboriculture [APP-062]**, which considers baseline arboricultural conditions and evaluates likely effects during construction, operation and decommissioning. This assessment identifies where tree removal or pruning may be required and concludes that, with embedded mitigation in place, no significant adverse residual effects on arboricultural features are anticipated. Embedded mitigation measures include sensitive siting of infrastructure, minimum offsets from retained trees, protection of root protection areas, supervision by an Arboricultural Clerk of Works, and the use of trenchless construction techniques where required to avoid impacts on high-value trees. Where any unavoidable tree losses are necessary, compensatory tree and woodland planting is proposed as part of the Scheme's landscape and ecological mitigation.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				Details of tree protection, replacement planting and long-term management are set out in the **Outline Landscape and Ecological Management Plan [APP-283]** and the **Outline Construction Environmental Management Plan [APP-277]**. The preparation, approval and implementation of a detailed landscape and ecological management plan and a detailed construction environmental management plan, substantially in accordance with the relevant outline plans, are secured through Requirements 7 and 13 in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that arboricultural mitigation measures are delivered and maintained throughout the lifetime of the Scheme.
RBF-002	Soils and Agriculture	Biomass Crop	It will involve the destruction of an established biomass crop.	The Applicant acknowledges that some crop losses will occur where crops are perennial, as biomass crops generally are, and as the suitable soil handling window is likely to be during the growing season. Disturbance to the land will be of a restricted width for installation of the cable, minimising the area of potential crop loss. Land and soils subject to disturbance for the installation of the cables will be reinstated as soon as reasonably practicable and in agreement with the landowner Furthermore, loss of agricultural revenue as a result of temporary works to construct the Cable Route Corridor can be compensated either through voluntary agreement with the Applicant, or through the application of compulsory acquisition powers.
RBF-003	Socio-Economics, Tourism and Recreation	Loss of Income and Compensation	The compensation offered fails to take into account the cost of replanting and the loss of income for the following 3 years. Overall, the compensation being offered in no way reflects the actual cost and loss	The Applicant seeks to minimise disruption to affected farming businesses where practicable by ensuring works are undertaken to a high standard. As such, the measures in the **OCEMP [APP-277]** and **OSRMP [APP-280]** together commit to ensuring full soil surveys are undertaken and soil stripping, storage and reinstatement are controlled to minimise effects

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			of earnings that this upheaval will cause. From experience we know that disturbed land can take many years to return to its original potential. A sewer pipe was laid by compulsory order across our land in 2017. This year the yield from that section of the field was approximately 50%less than the rest of that same field.	from disturbance and compaction. These documents are secured by Requirements 13 and 17 in Schedule 2 to the **Draft DCO [APP-016]**. Where there are any residual impacts on farm businesses, the Applicant will engage with landowners to compensate them through voluntary agreements or the compensation mechanisms available for the use of compulsory acquisition powers. The Applicant is continuing to engage with landowners to understand potential impacts on their businesses over this period, including on impacts related to crop yield.
RBF-004	Description and DCO Process	Project Deliverability	Lime Down Solar Park Ltd, in their dealings to date have shown a high level of incompetence, sending out legal documents with their own name incorrect, with decimal points in the wrong place, and with gagging clauses erroneously included, to name a few examples. As a business, we have no confidence that this company is able to deliver this project efficiently and do not look forward to having to deal with them. Please reject this application. This is not NIMBYism - it does not benefit the local community in any way, it will increase electricity prices for all and when considered alongside the many other similar projects, will have a negative effect on the nation's food security. Really not a good idea!	The Applicant works with an experienced professional team across planning, environmental, legal and land disciplines. Where minor administrative errors are identified in correspondence or draft documentation, these are corrected in the normal course of project management and do not affect the substance of the Application or the robustness of the assessment. The Applicant remains committed to engaging professionally and constructively with all stakeholders throughout the Examination. The **Statement of Need [APP-266]** describes that there is an urgent and unprecedented need for new low carbon generation in the UK to meet our climate change, energy security and affordability targets. Further, the Government considers that a secure, reliable, affordable, net zero consistent system in 2050 is likely to be composed predominantly of wind and solar (NPS EN-1, Para 3.3.20). Further, Section 2.9 of the **Statement of Need [APP-266]** describes that the government is seeking a large capacity of new low carbon schemes to come forwards to prioritise projects needed for 2030, while maintaining a robust pipeline of projects beyond 2030 towards meeting net zero by 2050

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
RBF-005	Socio-Economics, Tourism and Recreation	Cable Route Corridor	As far as our business is concerned this project will have a significant negative impact. The chosen route for the cable is incorrect in my view. It should go through the participants land before going through non - interested third parties' land. It will bisect and destroy sections of our ancient pasture land causing significant practical difficulties during construction (access to grazing land on the other side, water etc). It will involve the destruction of mature trees and will damage the drainage.	The Applicant confirms that no agricultural land will be destroyed as a result of the Scheme. The soil handling for the installation of the cables will be managed in accordance with a detailed Soil Resources Management Plan (SRMP). The **Outline SRMP [APP-280]** sets out the broad best practice principles as well as handling windows to minimise effects on soils. The disturbance will be short-term; there will be no resulting access difficulties arising from the short-term cable installation works. Potential effects on local drainage associated with cable installation are assessed and managed through the hydrology, flood risk and drainage assessment, which concludes that the Cable Route Corridor can be constructed without increasing flood risk or causing adverse off site effects when the defined controls are implemented. This is set out in **ES Volume 1, Chapter 11 Hydrology, Flood Risk and Drainage [APP-063]** and the corridor specific assessment in **ES Volume 3, Appendix 11-9 Flood Risk Assessment and Drainage Strategy - Lime Down Cable Route Corridor [APP-218]**. The construction approach includes measures to maintain existing drainage function during works, manage temporary flow routing, and reinstate drainage features and ground levels following installation, with construction controls secured through the construction environmental management framework in **Outline Construction Environmental Management Plan [APP-277]** and detailed method statements subject to approval prior to commencement. On this basis, the Scheme is not expected to result in lasting damage to drainage. The anticipated effects to the farming business affected by cable routing are likely to be temporary and restricted to the

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				width of the Cable Route Corridor. Where fields have been bisected, working practices around cable laying works should allow for access to be maintained to both sides of the Cable Route Corridor to allow for agricultural work to be continued even during construction. The **OCEMP [APP-277]** furthermore commits to the reinstatement of land affected by cabling works as soon as practicable to allow for agricultural work on the land to recommence as usual as soon as construction of that section of cable route is complete. No veteran or ancient trees are proposed to be removed to facilitate the Scheme. The Scheme has been designed through an iterative process to retain existing arboricultural features as far as practicable and to avoid and reduce impacts on trees, groups of trees and woodland. Potential impacts on arboriculture are fully assessed in **ES Volume 1, Chapter 10: Arboriculture [APP-062]**, which considers baseline arboricultural conditions and evaluates likely effects during construction, operation and decommissioning. This assessment identifies where tree removal or pruning may be required and concludes that, with embedded mitigation in place, no significant adverse residual effects on arboricultural features are anticipated. Embedded mitigation measures include sensitive siting of infrastructure, minimum offsets from retained trees, protection of root protection areas, supervision by an Arboricultural Clerk of Works, and the use of trenchless construction techniques where required to avoid impacts on high-value trees. Where any unavoidable tree losses are necessary, compensatory tree and woodland planting is proposed as part of the Scheme's landscape and ecological mitigation.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				Details of tree protection, replacement planting and long-term management are set out in the **Outline Landscape and Ecological Management Plan [APP-283]** and the **Outline Construction Environmental Management Plan [APP-277]**. The preparation, approval and implementation of a detailed landscape and ecological management plan and a detailed construction environmental management plan, substantially in accordance with the relevant outline plans, are secured through Requirements 7 and 13 in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that arboricultural mitigation measures are delivered and maintained throughout the lifetime of the Scheme.

4.29 The Vine Tree

Table 4-29 RR-4654

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
VT-001	Socio-Economics, Tourism and Recreation	Threat to Livelihood and Recent Investment	Threat to Livelihood and Recent Investment a. I have recently invested heavily to save and restore The Vine Tree, a historic pub that was once a popular hub frequented even by royalty. b. This project poses an existential threat to my business and the immense personal time and money invested in making it a success again. c. The loss of the pub would cause significant damage to community character, house prices, and the social fabric of the area.	Whilst individual businesses were not assessed in **ES Volume 1 Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]**, the Applicant recognises that the location of The Vine Tree in Norton gives it an increased sensitivity to changes in economic conditions and visitor spending as a tourism and visitor-dependent business. The Applicant has sought to minimise impacts upon neighbouring properties and amenity through the mitigation measures secured by requirements in Schedule 2 to the **Draft DCO [APP-016]**. Specifically at Norton, this has included ensuring the Scheme design at Lime Down B is buffered considerably from residential and community buildings (including The Vine Tree pub) to minimise visual impacts, while traffic impacts are mitigated through the use of a haul route parallel to the Fosse Way to access Lime Down B for construction, rather than using the local highway network through Norton, and the use of traffic mitigation measures to reduce impacts on the Norton-Hullavington road. These measures seek to minimise impacts to residents and to visitors, and as such, look to mitigate against significant effects to the business at The Vine Tree pub. The Applicant has committed to measures to enhance local employment and skills development through the **OSSCEP [APP-285]**, secured by Requirement 18 in Schedule 2 to the **Draft DCO [APP-016]**. Should the Scheme impact upon patronage to the pub affecting its viability as a business, the operators of The Vine Tree would be eligible to benefit from those measures, subject to the final SSCEP being agreed by Wiltshire Council and any other stakeholders.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				As the Applicant has sought to minimise impacts on neighbouring properties and amenity, and thus on the business at The Vine Tree pub, the Applicant considers it unlikely that the Scheme would lead to the loss of the pub, or any subsequent impacts on community character, house prices, and the social fabric of the area.
VT-002	Socio-Economics, Tourism and Recreation	Tourism and Trade	Direct Impact on Tourism and Trade a. The pub's resurgence relies on visitors who come to walk, enjoy lunch, and sit in our garden to experience the countryside. b. Every access route to the pub will be lined with industrial-scale solar panels, which will actively deter these visitors. c. While Wiltshire Council estimates a £1.8 million loss in tourism income for the area, I believe the true figure will be higher, as my pub and others will be dramatically and directly affected.	The assessment of impacts to tourism and recreation receptors in **ES Volume 1 Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** and its supporting **ES Volume 3 Appendix 16-2 Tourism and Recreation Receptor Tables [APP-241]** has assessed the impacts to each PROW on the approach to Norton, and finds no significant adverse effects to these routes at any phase of the Scheme, subject to implementation of mitigation measures. A significant adverse effect to the Wiltshire Way cycle route during construction and decommissioning has been assessed, however this is predominantly likely to occur as a result of HGV traffic and direct views of the Scheme along the Fosse Way between Ladyswood and Grittleton. Access routes to The Vine Tree which interact with the Scheme will largely be screened by landscape planting, which will mature during the operational phase of the Scheme, reducing the visual amenity effect from travelling net to the Solar PV Arrays. Details of the proposed landscape and ecological mitigation and enhancement measures are provided in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**, Figure 3-4-1 to 3-4-5.2 **Landscape and Ecology Mitigation Plan [APP-084]** and the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]**, and the **Outline Ecological Protection and Mitigation Strategy (EPMS) [APP-284]**.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				The Applicant has assessed that there is a likely worst-case temporary loss of £1.76 million GVA per annum as a result of the Scheme's construction. The Applicant does not however agree with Wiltshire Council that this effect on tourism employment is significant, accounting for approximately 0.17% of tourism employment across Wiltshire and less than 0.15% of the value of the combined tourism industry value across Wiltshire (Visit Wiltshire, 2021). The Applicant also seeks to reiterate that this is a temporary effect, anticipated to occur during construction, based on a worst-case scenario determined by likely significant effects from the Scheme, with recovery to tourism businesses anticipated to begin as soon as construction works are complete. Additional mitigation measures (which were not quantified for inclusion in the assessment of potential losses to employment) secured in the **Outline Skills, Supply Chain and Employment Plan [APP-285]** seek to reduce tourism employment losses through focussing on local recruitment, promoting local suppliers where practicable, and through providing retraining opportunities for workers in tourism-dependent industries.
VT-003	Landscape and Visual	Destruction of Local Character and Heritage	Destruction of Local Character and Heritage a. Norton is a very beautiful village, and The Vine Tree has a long history documented in paintings for centuries. b. Covering the surrounding fields with solar panels will devastate the landscape that visitors and locals cherish, destroying the very atmosphere people come for.	The Applicant has sought to minimise impacts upon neighbouring properties and amenity through the mitigation measures secured by requirements in Schedule 2 to the **Draft DCO [APP-016]**. Specifically at Norton, this has included ensuring the Scheme design at Lime Down B is buffered considerably from residential and community buildings (including The Vine Tree pub) to minimise visual impacts, while traffic impacts are mitigated through the use of a haul route parallel to the Fosse Way to access Lime Down B for construction, rather than using the local highway network through Norton, and the use of traffic mitigation measures to reduce impacts on the Norton-Hullavington road. These measures seek to minimise impacts to residents

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				and to visitors, and as such, look to mitigate against significant effects to the business at The Vine Tree pub. An assessment of landscape and visual effects is provided in the Landscape and Visual Impact Assessment (LVIA) presented in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**. The LVIA assesses effects on identified landscape and visual receptors, including residential properties, users of public rights of way and roads and identifies where significant effects may occur. The LVIA recognises that there would be temporary Moderate Adverse effects on Landscape Character within the 1 km as a result of the change in land use from arable farmland to solar infrastructure. However, the Scheme proposes significant mitigation measures informed by Wiltshire's Nature Recovery Strategy to reduce the effects of the Scheme on landscape character which will provide significant beneficial effects to the fabric of the Sites and the legacy Landscape. Mitigation measures to address landscape and visual effects are set out in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**, **Figure 3-4-1 to 3-4-5.2 Landscape and Ecology Mitigation Plan [APP-084]** and secured within the **Outline Landscape and Ecological Mitigation Plan (LEMP) [APP-283]** and the **Outline Ecological Protection and Mitigation Strategy (EPMS) [APP-284]**. These documents include proposals for new and enhanced planting, retention of existing hedgerows and woodland, and landscape integration measures to reduce visual effects over time. In addition, the Scheme design incorporates minimum offsets from existing landscape features, including residential properties, ancient woodland, woodland, hedgerows, public rights of way and watercourses, to further limit visual

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				impacts. Although these measures reduce the effects of the Scheme on nearly all receptors, as noted above there are 10 receptors which would experience Significant Visual Effects for the duration of the Scheme as set out Table 8-30 of the **LVIA [APP-060]**. Mitigation measures to address landscape and visual effects are set out in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**, **Figure 3-4-1 to 3-4-5.2 Landscape and Ecology Mitigation Plan [APP-084]**. The preparation, approval and implementation of detailed landscape and ecological management plans, substantially in accordance with the **OLEMP [APP-283]** and **EPMS [APP-284]**, are secured through requirements in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that the identified mitigation measures are delivered and maintained throughout the lifetime of the Scheme.
VT-004	Socio-Economics, Tourism and Recreation	Risk to Local Employment and Community	Risk to Local Employment and Community a. I will likely be forced to reduce staff, most of whom are local residents and families for whom the pub provides vital first jobs and ongoing employment. b. The local community has been a huge support, but if the project proceeds, the days of having a viable pub here are numbered, leading to job losses, lost revenue, and another community pub closure.	Whilst individual businesses were not assessed in **ES Volume 1 Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]**, the Applicant recognises that the location of The Vine Tree in Norton gives it an increased sensitivity to changes in economic conditions and visitor spending as a tourism and visitor-dependent business. The Applicant has sought to minimise impacts upon neighbouring properties and amenity through the mitigation measures secured by requirements in Schedule 2 to the **Draft DCO [APP-016]**, and hopes this can mitigate the majority of adverse effects to the operation of The Vine Tree pub. The Applicant has also committed to measures to enhance local employment and skills development through the **OSSCEP [APP-285]**, secured by Requirement 18 in Schedule 2 to the **Draft DCO [APP-016]**. The operators of

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				The Vine Tree would be eligible to benefit from those measures, subject to the final SSCEP being agreed by Wiltshire Council and any other stakeholders.
VT-005	Hydrology, Flood risk and Drainage	Flooding	Practical and Environmental Hazards a. Flooding Risk: The pub is in a known flash flood zone at the bottom of a hill. Covering upstream fields with solar infrastructure could worsen runoff and flood risk, potentially trapping cars and limiting access to the pub.	The assessment presented in **ES Volume 1, Chapter 11 Hydrology, Flood Risk and Drainage [APP-063]** recognises that there are existing areas within the surrounding locality that experience surface water and flash flooding under baseline conditions. The assessment concludes, however, that the Scheme would not increase surface water runoff or exacerbate flood risk to receptors beyond the Order limits, including properties and businesses located downslope. Solar PV panels drain to the existing ground surface and do not create roof like runoff behaviour, and runoff from the Scheme is controlled so that post development discharge rates and volumes do not exceed the greenfield condition. On this basis, while existing flooding issues may continue to occur, the Scheme is not expected to worsen surface water flood risk or affect access during heavy rainfall events.
VT-006	Transport and Access	Traffic Impact	b. Access & Transport Chaos: During the two-year construction, roads will be clogged with roughly one heavy goods vehicle every 10 minutes, making it next to impossible for staff and guests to reach the pub.	The potential effects of construction traffic on the local highway network are assessed in **ES Volume 1, Chapter 13: Transport and Access [APP-065]**, which considers construction vehicle movements, traffic volumes, road safety and effects on road users. The construction period is temporary an example of flows included in the assessment are: • trip generation of 50 HGVs on the route to Lime Down A-C is an estimate of the deliveries on a peak day, so does not represent a daily average;

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				• trip generation of 50 HGVs on the route to Lime Down A-C is based on the worst-case assumptions, including but not limited to, all phases and Solar PV Sites being constructed simultaneously and a 50% uplift; • average number of HGV construction movements along the Route to Lime Down A-C route is only 32 per day/7 per hour/one every 8 minutes (less than the journey time along the route); • assuming a realistic construction programme, the average number of HGV construction movements along the route to Lime Down A-C is only 17 per day/less than 3 per hour/one every 25 minutes (less than the journey time along the route) • delivery times during the construction phase are limited to those times set out in the **oCTMP [APP-287].** There will be no HGV trips outside of these hours; The assessment concludes that the level of construction traffic associated with the Scheme is unlikely to materially affect road safety on links within the Study Area, and no significant adverse effects on accident risk are anticipated. The assessment additionally concludes that with appropriate mitigation such as the CTMP in place, there would be no significant adverse impacts on the local highway network during the construction, operation and maintenance, and decommissioning phases of the Scheme. Construction vehicle movements will be managed through a Construction Traffic Management Plan. An **Outline Construction Traffic Management Plan (CTMP) [APP-287]** has been prepared and submitted with the DCO application. The aim of the CTMP is to ensure that the effect of the

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				construction phase on the local highway network is minimised. The **Outline CTMP [APP-287]** sets out measures to coordinate construction deliveries by HGVs to arrive and depart between 09:30 and 16:30 where possible, to avoid peak network hours of 08:00–09:00 and 17:00–18:00. It also includes a community liaison element to keep local communities informed about the construction process and to provide a contact for feedback should any issues arise. Compliance with the CTMP will be monitored by the Developer, Contractor and Wiltshire Council as local highway authority. The preparation, approval and implementation of the final CTMP, substantially in accordance with the outline CTMP, are secured through Requirement 15 of Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring construction traffic impacts are appropriately managed throughout the construction phase of the Scheme.
VT-007	Noise and Vibration	Noise and Amenity Destruction	c. Noise and Amenity Destruction: The constant noise and vibration from construction and the operational BESS will drive customers away, especially from our garden, causing immense economic damage.	The noise and vibration impacts arising from construction activities are assessed in Section 14.10 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**; this includes The Vine Tree (R43). Mitigation measures are committed to through the **Outline Construction Environmental Management Plan [APP-277]**. With these measures in place, noise exposure levels at the Vine Tree are expected to be around 53 dB, which is the level of regular conversation and should not therefore drive customers away. This noise would primarily originate from the construction of the solar PV sites to the north of Honey Lane, and levels would be lower still once this section of the Scheme was complete. A noise monitoring programme agreed with Wiltshire Council will be carried out during construction. This is secured in the

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				Outline Construction Environmental Management Plan [APP-277]. During operation of the Scheme, noise levels at The Vine Tree are expected to be around 34 dB, as shown in Table 8 of **ES Volume 3, Appendix 14-4: Noise Modelling [APP-237]**. This level is well below that of regular conversation and equivalent to the existing background sound level in the vicinity of this location. The **Outline Operational Environmental Management Plan [APP-278]** commits to these levels, providing assurance that significant effects from operational noise will be avoided.
VT-008	Description and DCO Process	Conclusion	Final Opposition a. I strongly oppose this proposal. It is the wrong scale, in the wrong place, and for the wrong reasons. b. I urge you to refuse this application to protect my business, my staff's jobs, the local community, and the historic character of this area.	The Applicant notes the matters raised and confirms that these have been addressed in the responses provided above.

4.30 Amy Kent Rugs Ltd

Table 4-30 RR-0224

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
AKR-001	Description and DCO Process	Introduction	As a business I avidly object to the Lime Down project. This is not only an area of huge beauty that attracts lots of visitors to be in the countryside, but it is also an area where there are lots of small artisan businesses (like mine).	The Applicant has assessed the likely impacts to the tourism-based economy in **ES Volume 1 Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]**, based on a worst-case scenario determined by likely significant effects from the Scheme at each phase of the Scheme. No significant adverse effect to any assessed economic sector has been identified in the assessment at any phase of the Scheme.
AKR-002	Socio-Economics, Tourism and Recreation	Impact on Business	I moved here because it was too expensive to have a showroom in London or any other town so my showroom is down here with my parents. My clients love coming to this area and when they do I recommend lots of local places to visit to eat at and also shop for other interior items for their house. Having this project here will undoubtedly prevent clients from visiting, especially because of the massive increase of traffic that is going to be caused during the construction phase. I know this phase is meant to be only a few years, but the damage would already have been done, and this area will have a bad reputation.	The Applicant has assessed the likely impacts to the tourism-based economy in **ES Volume 1 Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]**, based on a worst-case scenario determined by likely significant effects from the Scheme at each phase of the Scheme. The most substantial considerations within this are visual and amenity impacts to tourism destinations and PRoW that may dissuade visitors from accessing the areas affected by the Scheme. Impacts from construction traffic have also been considered in specific locations where interactions with construction HGVs are most likely to occur. However, impacts from HGVs on the highway network are not anticipated to be significant, as assessed in **ES Volume 1 Chapter 13: Transport and Access [APP-065]**, and therefore it is not considered likely that there would be any significant effect to the ability for visitors to access the affected areas by road. The Applicant is in agreement with the commentor that the effects from construction are a temporary effect, and the Applicant anticipates recovery to tourism businesses to begin as soon as construction works are complete. Additional mitigation measures through the **Outline Skills, Supply Chain and Employment Plan [APP-285]** seek to reduce tourism employment losses through focussing on local recruitment, promoting local suppliers where practicable, and through providing retraining opportunities for workers in

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				tourism-dependent industries. The **Outline Skills, Supply Chain and Employment Plan [APP-285]** is secured by Requirement 18 in Schedule 2 to the **Draft DCO [APP-016]**.
AKR-003	Socio-Economics, Tourism and Recreation	Tourism	A lot of tourists from outside the UK also come to this area as part of their UK experience, and again will visit my showroom as well as others, on a tour of the countryside. The proposal is bang in the middle of the Cotswolds, one of the most renown areas that attracts tourism, creating business and economy for this whole area.	The Applicant has considered the likely impacts to the tourism-based economy in **ES Volume 1 Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** with respect to international tourism spending and day visits as an integral part of the assessment piece. As such, regionally and nationally important tourism destinations such as the Cotswolds National Landscape (to which the Scheme borders) have been specifically assessed in **ES Volume 3 Appendix 16-2 Tourism and Recreation Receptor Tables [APP-241]**. The assessment finds no significant effects to these important tourism receptors at any phase of the Scheme. Furthermore, the Applicant has been engaging with the Cotswolds National Landscape Board to ensure that there is agreement on assessment methodology and appropriate mitigation. This has primarily revolved around landscape, with tourism impacts to the National Landscape not yet raised as a specific concern. This is however still under discussion through the process of agreeing a Statement of Common Ground with the Cotswolds National Landscape Board to be submitted at Deadline 1.
AKR-004	Site Selection and Alternatives	Scheme Location	I cannot believe that this is a good place to have a 'mega solar scheme'. It just seems madness.	National Policy Statement EN-3 Paras 2.10.11 and 2.10.18 explain that the availability of grid connection, suitable irradiance levels, and local topography are key inputs to the selection of sites suitable for large-scale solar generation developments. The number of locations within the UK at which large-scale solar generation is suitable is therefore likely to be limited, and this is a material issue when considering how the UK is to meet the urgent need for low carbon generation as is set out in the NPSs. This point is expanded upon in the **Statement of Need [APP-266]** in particular in Section 4.3. Chapter 8 of the **Statement of Need [APP-266]** provides evidence to support the suitability

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				of the proposed location of the Scheme for large-scale solar plus storage in relation to the timeliness and availability of the grid connection, transmission system operability and the decarbonisation and energy security benefits the Scheme will bring forward from this location. As set out in **ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP-056]** and the Site Selection Assessment Report at **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]** an appraisal of alternative sites within a 20km radius of the Existing National Grid Melksham Substation has been undertaken, which concludes that there are no more suitable locations within the 20km search area than the proposed location for the Scheme.
AKR-005	Socio-Economics, Tourism and Recreation	Property Market	Many people buy houses in this area which results in jobs and employment for skilled artisan creators and workmen. This will drop hugely, no-one will want to buy here.	Impacts of the Scheme on property prices have not been assessed as these have been agreed by the Planning Inspectorate to be scoped out of assessment in the ES, as set out in **ES Volume 3, Appendix 1-2: Scoping Opinion Response Table [APP-181].** As a result, other impacts on the local property market have not been assessed either. That notwithstanding, the Applicant has sought to minimise impacts upon residential properties and residential amenity through the mitigation measures secured by requirements in Schedule 2 to the **Draft DCO [APP-016]**. The Applicant has also assessed likely impacts on community and social wellbeing, and on the physical and mental health impacts of the Scheme on the local population in **ES Volume 1 Chapter 18: Human Health [APP-070]**. The assessment concludes that there are no significant adverse effects anticipated to population and community or social health and wellbeing.
AKR-006	Socio-Economics,	Impact on Local Community	This would have a massive effect on everything around here - the	The Applicant does not consider the Scheme is likely to have any significant adverse effects on socio-demographic or

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
	Tourism and Recreation		occupation in the schools, the local shops and restaurants, the national trust places that rely on visitors and donations, like Westonbirt. So many repercussions. Thank you for considering my objection.	population, and does not anticipate any changes to the desirability of the area to live in would affect the number of people accessing local services like schools or businesses. This has been assessed with respect to the Scheme in **ES Volume 1 Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]**. Impacts on tourism destinations have been assessed specifically in **ES Volume 3 Appendix 16-2 Tourism and Recreation Receptor Tables [APP-241]** based on the likelihood of impacts upon them and the likely affect the Scheme will have on them as tourism destinations. For example, Westonbirt Arboretum was scoped out of full assessment on the basis that visual amenity from the Scheme or accessibility impacts from HGVs would not have a material impact upon its tourism value or its operation. Where impacts to tourism-destinations have been assessed, it is anticipated that significant effects can be mitigated against, albeit as a worst-case scenario, the Scheme is assessed as having the potential to cause a temporary loss of 50 FTE jobs and £1.76 million GVA per annum during the construction phase. The Applicant anticipates recovery to tourism businesses to begin as soon as construction works are complete. Additional mitigation measures through the **Outline Skills, Supply Chain and Employment Plan [APP-285]** seek to reduce tourism employment losses through focussing on local recruitment, promoting local suppliers where practicable, and through providing retraining opportunities for workers in tourism-dependent industries. The **Outline Skills, Supply Chain and Employment Plan [APP-285]** is secured by Requirement 18 in Schedule 2 to the **Draft DCO [APP-016]**.

4.31 BDP Imports Holdings Limited

Table 4-31 RR-0456

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
BDPIH-001	Socio-Economics, Tourism and Recreation	Local Economy	I object to this development due to the potential negative impact on the local economy.	An assessment of the likely effects of the Scheme on the local economy and employment is provided in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]**. This chapter considers potential impacts on construction and engineering sectors, agricultural activity, tourism-related businesses, and wider local economic conditions during construction, operation and decommissioning. Supporting evidence is provided in **ES Volume 3, Appendix 16-3: Socio-Economics, Tourism and Recreation – Summary of Non-Significant Effects [APP-242]**, which summarises that effects on the local economy and economic prosperity are assessed as negligible to minor beneficial, with construction expenditure and employment generation contributing positive, temporary effects on local economic activity. The assessment concludes that the Scheme would not result in significant adverse effects on local businesses or the wider local economy, and that socio-economic benefits, including job creation and local supply-chain opportunities, are expected during the construction phase, with more modest economic and skills and supply chain opportunities during the operational phase. The Applicant notes that the approach to assessment of socio-economic effects has been agreed with Wiltshire Council's Economic and Regeneration Team, with the exception of matters relating to agricultural employment, which the Applicant is still discussing with the Team. This is set out in the Statement of Common Ground with Wiltshire Council to be submitted at Deadline 1.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
BDPIH-002	Site Selection and Alternatives	Brownfield Land and Rooftop Solar	Surely large-scale solar developments of this type are better suited on brownfield land, industrial sites and large commercial rooftops where infrastructure already exists. This will reduce the need for disruptive construction and grid upgrades. These more suitable sites will also minimise visual impact and protect the character and existence of our dwindling countryside.	In relation to suggestions that brownfield land or alternative locations should be used, including rooftops, these matters are addressed in **ES Volume 1, Chapter 4: Alternatives and Design Evolution and in the Statement of Need [APP-056 and APP-266]**. The Applicant has considered alternatives, including previously developed land and other forms of solar deployment, as part of the site selection and design evolution process. As shown in Table 2-2 of **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]**, the Applicant has considered previously developed land/brownfield land over 1 hectare within the area of search, based on the brownfield land registers of the relevant Local Planning Authorities, and concluded that none of the sites are large enough to provide a viable land parcel of at least 40 ha and sites were not considered to be available as they have planning permission for residential development and/or are allocated for residential/mixed use development. National policy and government guidance, as set out in the **Statement of Need [APP-266]**, recognise that while rooftop and smaller-scale solar installations are an important part of the energy mix, they cannot alone meet the scale of capacity required to achieve clean power and net zero objectives. Large-scale ground-mounted solar therefore remains necessary in addition to, not instead of, rooftop solar. An assessment of landscape and visual effects is provided in the Landscape and Visual Impact Assessment (LVIA) presented in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**. The LVIA assesses effects on identified landscape and visual receptors, including residential properties and users of public rights of way, and identifies where significant effects may occur.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				The LVIA recognises that there would be temporary Moderate Adverse effects on Landscape Character within the 1 km as a result of the change in land use from arable farmland to solar infrastructure. However, the Scheme proposes significant mitigation measures informed by Wiltshire's Nature Recovery Strategy to reduce the effects of the Scheme on landscape character which will provide significant beneficial effects to the fabric of the Sites and the legacy Landscape.
BDPIH-003	Transport and Access	Traffic Impact	The developer's own transport assessment shows a terrifying volume of construction and HGV movements over an extended period creating chaos to the local and main road networks.	The potential effects of construction traffic on the local highway network are assessed in **ES Volume 1, Chapter 13: Transport and Access [APP-065]**, which considers construction vehicle movements, traffic volumes, road safety and effects on road users. This included the capacity of local roads and infrastructure to accommodate construction vehicles with consideration of construction traffic volumes, vehicle types, route suitability, and network performance. The assessment concludes that with appropriate mitigation in place, there would be no significant adverse impacts on the local highway network during the construction, operation and maintenance, and decommissioning phases of the Scheme. Construction vehicle movements will be managed through a Construction Traffic Management Plan. An **Outline Construction Traffic Management Plan (CTMP) [APP-287]** has been prepared and submitted with the DCO application. The aim of the CTMP is to ensure that the effect of the construction phase on the local highway network is minimised. The **Outline CTMP [APP-287]** sets out measures to coordinate construction deliveries by HGVs to arrive and depart between 09:30 and 16:30 where possible, to avoid peak network hours of 08:00–09:00 and 17:00–18:00. It also includes a community liaison element to keep local

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				communities informed about the construction process and to provide a contact for feedback should any issues arise. Compliance with the CTMP will be monitored by the Developer, Contractor and Wiltshire Council as local highway authority. The preparation, approval and implementation of the final CTMP, substantially in accordance with the outline CTMP, are secured through Requirement 15 of Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring construction traffic impacts are appropriately managed throughout the construction phase of the Scheme.
BDPIH-004	Human Health Landscape and Visual	Landscape Character and Local Wellbeing	The planned development in incompatible with the character, needs and long-term wellbeing of the area. I therefore strongly object and ask that the application is refused.	Impacts on mental health and wellbeing are assessed in **ES Volume 1, Chapter 18: Human Health [APP-070]**. This chapter provides a comprehensive assessment of the Scheme's potential effects on human health, including mental health and wellbeing, through consideration of a broad range of health determinants. These include access to open space and recreation, transport and connectivity, community identity and cohesion, employment and income, noise and vibration, air quality, and access to health and social care services. The assessment applies a health "*lens*" to the findings of relevant technical chapters and concludes that, with embedded mitigation and additional measures secured, the Scheme would not give rise to significant adverse effects on population health, including mental health and wellbeing. The assessment focuses on communities within a 2 km Study Area surrounding the Scheme, identified as those most likely to experience potential health-related effects. Baseline analysis demonstrates that rates of poor mental health within the Study Area are generally lower than national averages, and the assessment considers potential pathways by which the Scheme could influence mental

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				wellbeing, including changes to environment, amenity, access and community factors. Residual effects following mitigation are assessed as not significant at any phase of the Scheme. Consultation with Wiltshire Council's Public Health Team has informed the approach to mental health considerations, as documented in **ES Volume 3, Appendix 18-1: Human Health Consultation [APP-244]**. Through this engagement, the Applicant has committed to signposting locally available mental health and wellbeing resources to members of the public engaging with the Scheme, using information provided by Wiltshire Council's Public Health Team. The Applicant will continue to monitor consultation responses relating to mental health and will provide appropriate signposting to existing local support services where requested. The Applicant notes that the assessment methodology for health and wellbeing has been agreed with Wiltshire Council's Public Health team and is set out in the Statement of Common Ground with Wiltshire Council to be submitted at Deadline 1.

4.32 The Baraka Catering Company

Table 4-32 RR-4646

Reference	Theme		Comments/Issues Raised	Applicant's Response
BCC-001	Soils and Agriculture	Use of Farmland	Running a food business I am up in arms about this, farmland is being destroyed, food costs will keep going up and this could in the end bring my business to an end.	As the Scheme is unlikely to make a material difference to food prices in the UK, there is therefore no likely indirect effect to this business resulting from the Scheme.
BCC-002	Transport and Access	Traffic Impact	Traffic will be a disaster in the area during all the years it takes to build. It must be stopped	The potential effects of construction traffic on the local highway network are assessed in **ES Volume 1, Chapter 13: Transport and Access [APP-065]**, which considers construction vehicle movements, traffic volumes, road safety and effects on road users. The assessment concludes that the level of construction traffic associated with the Scheme is unlikely to materially affect road safety on links within the Study Area, and no significant adverse effects on accident risk are anticipated. The assessment additionally concludes that with appropriate mitigation such as the CTMP in place, there would be no significant adverse impacts on the local highway network during the construction, operation and maintenance, and decommissioning phases of the Scheme. Construction vehicle movements will be managed through a Construction Traffic Management Plan. An **Outline Construction Traffic Management Plan (CTMP) [APP-287]** has been prepared and submitted with the DCO application. The aim of the CTMP is to ensure that the effect of the construction phase on the local highway network is minimised. The **Outline CTMP [APP-287]** sets out measures to coordinate construction deliveries by HGVs to arrive and depart between 09:30 and 16:30 where possible, to avoid peak network hours of 08:00–09:00 and 17:00–18:00. It also includes a community liaison element to keep local communities informed about the construction process and to provide a contact for feedback

Reference	Theme		Comments/Issues Raised	Applicant's Response
				should any issues arise. Compliance with the CTMP will be monitored by the Developer, Contractor and Wiltshire Council as local highway authority. The preparation, approval and implementation of the final CTMP, substantially in accordance with the outline CTMP, are secured through Requirement 15 of Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring construction traffic impacts are appropriately managed throughout the construction phase of the Scheme.

4.33 Hawker Farms

Table 4-33 RR-1793

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response

HF-001	Description and DCO Process	Introduction	Lime Down Solar Park. As a long-established family farming business in Hullavington, we are directly and severely affected by the proposal. We register our STRONG OBJECTION. Our core objections are as follows	The Applicant is confident that the proposed management and mitigation measures set out in the **ES [APP-052 to APP-265]** are comprehensive and robust and that the Scheme aligns with national and local planning policy; this is outlined in the **Planning Statement [APP-267]**. Of particular relevance are Annex A: National Policy Statement Accordance Tables and Annex B: Local Policy Accordance Tables, of the Planning Statement which set out an appraisal of the Scheme against the policies.

HF-002	Soils and Agriculture	Agricultural Businesses and Food Security	- Threat to Agricultural Business Viability & Food Security o The proposed compulsory acquisition of land we own plus an additional approximately 100 acres we rent, would critically undermine our business model. We will be unable to feed the livestock we have.	The Applicant has identified Hawker Farms as having interests in land along the Cable Route Corridor in two locations. The anticipated effects to the farming business affected by cable routing are likely to be temporary and restricted to the width required for cable trenching works and any associated haul route, or entry and exit pits for horizontal directional drilling operations. Where fields have been bisected, working practices around cable laying works should allow for access to be maintained to both sides of the Cable Route Corridor to allow for agricultural work to be continued even during construction. The **OCEMP [APP-277]** furthermore commits to the reinstatement of land affected by cabling works as soon as practicable to allow for agricultural work on the land to recommence as usual as soon as construction of that section of cable route is complete. The assessment of effects on agricultural land and farming operations, including temporary land take associated with the cable route, is provided in **ES Volume 1, Chapter 17: Soils and Agriculture [APP-069]**, with detailed construction methodology set out in **ES Volume 3, Appendix 3-2: Cable Route Construction Method Statement [APP-183]**. The cable trench required for installation of underground cables would have a maximum anticipated working width of approximately 7 m. This equates to a temporary disturbance of approximately 0.07 hectares per hectare of land crossed. Disturbance associated with cable installation would be short term and localised, and following reinstatement, agricultural operations within the affected fields would be able to recommence. Accordingly, land take associated with cable installation would not permanently remove the affected land from agricultural use, and the extent and duration of disturbance have been assessed as limited. The widest cable trench is anticipated to be 7m (**ES Volume 3, Appendix 3-2 Cable Route Construction Method Statement [APP-183]**), resulting in disturbance of 0.07ha of land/crop per hectare square of land. Disturbance of the land for installation of

				the cables will be short-term and of restricted extent, such that agricultural operations in the applicable fields will be able to recommence shortly after the trenches have been reinstated. The Applicant is actively engaging with the respondent to agree appropriate and reasonable accommodation works and to reach an amicable solution for all parties, updates of which will be captured in the **Land and Rights Negotiations Tracker [APP-021]**. The Applicant has sought wherever practicable to reduce the amount of land subject to compulsory acquisition powers and the impact on the local community as a result of the Scheme through an iterative design process, having regard to consultation feedback and engagement with affected landowners (**ES Volume 3, Appendix 4-1 Site Selection Assessment Report [APP-185]).** The **Statement of Reasons [APP-018**] sets out the justification for the use of compulsory acquisition powers as part of the Scheme. It also confirms that the Applicant will continue to seek voluntary agreement for the acquisition of land and rights needed to ensure the implementation of the Scheme and the status of ongoing negotiations with affected owners is recorded in the **Land Rights Tracker [APP-021].** Notwithstanding this, under the provisions of the Land Compensation Act 1961 and the Land Compensation Act 1973, reasonable losses incurred by the landowner or occupier as a result of the Applicant's works are recoverable following claims to the Applicant upon a loss being incurred. Where compulsory acquisition powers are exercised, appropriate compensation will be available to those entitled under the Compensation Code. The **Funding Statement [APP-019]** confirms that the Applicant has sufficient funds to provide this compensation.

HF-003	Soils and Agriculture	Agricultural Business	o This loss could directly jeopardise our ability to fulfil a high-end supermarket supply contract for milk and beef, putting generations of investment at risk.	Loss of agricultural revenue as a result of temporary works to construct the Cable Route Corridor can be compensated either through voluntary agreement with the Applicant, or through the application of compulsory acquisition powers. The **OCEMP [APP-277]** furthermore commits to the reinstatement of land affected by cabling works as soon as practicable to allow for agricultural work on the land to recommence as soon as construction of that section of cable route is complete. The Applicant engaged with representatives of Hawker Farms during Statutory Consultation in which this contract was verbally discussed, and priority land identified. For DCO submission, some of this priority land was removed from the Order Limits where options for Grid Connection Cable routing were able to be discounted or avoided. This demonstrates the Applicant's intention to reduce impacts on agriculture in the local area by taking into account engagement and commentary undertaken prior to DCO submission. The widest cable trench is anticipated to be 7m (**ES Volume 2, Appendix 3-2: Cable Route Construction Method Statement [APP-183]**, resulting in disturbance of 0.07ha of land/crop per hectare square of land. Installation of the cable would require a temporary, short-term disturbance to the agricultural land and soil, which would be reinstated and available for use as soon as practicable after cabling works are completed.

HF-004	Soils and Agriculture	BMV Land	o The project would remove Best and Most Versatile (BMV) agricultural land from production, contradicting Wiltshire Council's core strategy and national planning policy protecting food security.	The effects of the Scheme on agricultural land, including land quality and productivity, are assessed in **ES Volume 1, Chapter 17: Soils and Agriculture [APP069]**, supported by **ES Volume 3, Appendix 171: Agricultural Land Classification and Soil Resource Survey Report [APP243]**. That assessment identifies that the majority of agricultural land affected is not Best and Most Versatile (BMV) land, comprising predominantly Subgrade 3b and Grade 4 land, which is not considered highquality agricultural land in planning terms. Governmentled agricultural initiatives, such as the Sustainable Farming Incentive which is relaunching later in 2026, have prioritised soil health, environmental enhancement and climate resilience, recognising that longterm food security is influenced by a range of factors beyond land take alone, including soil condition, climate change and environmental pressures. The Scheme allows soils to remain in situ and undisturbed during operation, supporting soil recovery and longterm land health, with land reinstated and returned to agricultural use as far as practicable following decommissioning. No permanent loss of agricultural land is anticipated. The Applicant does not consider that food security will be compromised by the Scheme (or solar energy more widely). The latest figures to September 2024 indicate that solar occupied around 21,200 ha of agricultural land in the UK. In 2025, 545,000 ha of arable land in England were left uncropped (source: Department for Environment, Food & Rural Affairs, Agricultural land use in England at 1 June 2025). It should also be noted that food security is not identified as an issue within the suite of Energy National Policy Statements or the National Planning Policy Framework (NPPF). Further, the Government's UK Solar Roadmap (2025) states that solar development is not considered to compromise food security, but that the climate and nature crisis poses the greatest long-term risk to food security - a risk which the Scheme directly helps to address by providing a secure, low-carbon source of electricity. As set out in Section 2 of the **Outline Decommissioning Strategy [APP-279],** post-decommissioning of the Scheme, the

				landowners would choose how the land is to be used and managed. The landowner may return all of the land to arable use, although it is likely that established habitats such as hedgerows and woodland would be retained given their potential benefits to agricultural land and the wider farming estate.

HF-005	Socio-Economics, Tourism and Recreation	Local Economy and Employment	- Severe Impact on Local Economy & Employment o Loss of the ability to use all the land we currently farm will incur downsizing and would force redundancies among our 11 permanent staff and eliminate many of our 10-20 seasonal roles, harming local employment.	Loss of agricultural revenue (and thus resultant impacts on employment) as a result of temporary works to construct the Cable Route Corridor can be compensated either through voluntary agreement with the Applicant, or through the application of compulsory acquisition powers. The anticipated effects to the farming business affected by cable routing works are likely to be temporary and restricted to the width required for cable construction works. The **OCEMP [APP-277]** furthermore commits to the reinstatement of land affected by cabling works as soon as practicable to allow for agricultural work on the land to recommence as soon as construction of that section of cable route is complete. Should redundancies be required as a result of the Scheme, affected workers would be eligible for accessing skills and employment support measures as secured through the **OSSCEP [APP-285]**, secured by Requirement 18 in Schedule 2 to the **Draft DCO [APP-016]**, subject to the final SSCEP being agreed by Wiltshire Council and any other stakeholders. The assessment of impacts to agricultural employment in **ES Volume 1 Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** primarily focuses on potential impacts on land within the Solar PV Sites because of the type of area affected and longer duration of impact. It is considered that agricultural losses from the construction of the Cable Route Corridor are not likely to materially influence the assessment outcomes.

HF-006	Socio-Economics, Tourism and Recreation	Employment	o It would end our apprenticeship schemes and student placements, cutting vital skills training for young people in the rural economy.	The anticipated effects to farming businesses affected by cable routing are likely to be temporary and restricted to the width required for cable construction works. This is not anticipated to have a significant impact on agricultural farm holdings, and as such, knock-on effects to apprenticeship schemes are also not anticipated to be significant. The Applicant understands the importance of local skill sharing and uplifting and so has committed to improving local skills through the measures set out in the **OSSCEP [APP-285]**, secured by Requirement 18 in Schedule 2 to the **Draft DCO [APP-016]**. The Applicant considers that the measures set out in the **OSSCEP [APP-285]** provide a good opportunity for the Applicant and Hawker Farms to engage in respect of a common benefit for the local area.
HF-007	Socio-Economics, Tourism and Recreation	Employment	o Our business supports a wide network of local contractors, merchants, and service providers; its degradation would have a significant negative knock-on effect across the immediate local economy. o We ask the Examiners to fully investigate the impact of harm to this local economy	The assessment of impacts to agricultural employment in **ES Volume 1 Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** has considered supply chain and downstream employment effects as part of its calculations of likely job losses and economic losses to the wider agricultural industry. The Applicant's assessment has identified a loss of up to 20 FTE jobs in the agricultural (and downstream) industry and an annual loss of £628,000, equivalent to 0.08% of the sector in the assessed 20 km Study Area. This has been considered as part of the assessment of changes in employment as a result of the Scheme in the Study Area, which finds no significant adverse effects to employment during any phase of the Scheme.

HF-008	Other Environmental Matters	BESS Location and Safety	- Unacceptable Animal Welfare & Safety Risks from BESS Proximity o Our pedigree dairy herd is housed within a few hundred metres of the proposed Battery Energy Storage System (BESS). o We fundamentally question the Applicant's noise assessment. Constant operational noise, especially at night, is proven to detrimentally affect cattle health and milk quality associated with high somatic cell counts. o We ask that Examiners commission and independent experts advise on the noise effects on high performance pedigree bovines in close proximity to an installation of the proposed magnitude.	The potential for operational noise from the Battery Energy Storage System (BESS) and other infrastructure to affect nearby receptors has been assessed in **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**, supported by technical modelling in **ES Volume 3, Appendix 14-4: Noise Modelling [APP-237]**. Levels would typically be below or slightly above the existing background sound in the area during the day and night, and as such no significant effects on human receptors are expected. The Applicant has also considered potential disturbance to animals and wildlife in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**. The assessment concludes no significant adverse effects on wildlife are anticipated. To ensure operational noise remains within these assessed limits, the **Outline Operational Environmental Management Plan (OEMP) [APP-278]** commits the Applicant to maintaining noise levels at or below those modelled in the ES. These commitments, alongside the safety protocols, are secured through Requirement 6 (Battery Safety Management) and Requirement 14 (OEMP) in Schedule 2 of the **Draft Development Consent Order [APP-016]**. Furthermore, safety risks associated with the BESS have been assessed in **ES Volume 1, Chapter 20: Other Environmental Matters [APP-072]** and are addressed through the **Outline Battery Safety Management Plan (OBSMP) [APP-286]**, which is being discussed with Dorset & Wiltshire Fire & Rescue Service. Regarding animal welfare, the Applicant notes that the cessation of intensive arable farming and the reversion to managed grassland during the operational phase of the Scheme is expected to reduce existing disturbance factors like heavy machinery use. While the Environmental Statement (ES) primarily assesses human and ecological receptors, the methodology for determining noise impacts on the local environment follows current policy and best practice guidance.

				In response to the request for independent experts, the Applicant maintains that the assessments have been conducted by competent experts with considerable experience in assessing large-scale infrastructure, as documented in **ES Volume 3, Appendix 1-1: Statement of Competence [APP-180]**.

HF-009	Noise and Vibration	Impact on Livestock	o What assurances will be made by the developers and ongoing owners, to ensure sufficient insurances would be put in place that will cover loss of stock through health implications or death linked with noise and likely toxic poisoning caused from the installations in the case of fire from the BESS	The Applicant confirms that where noise impacts are anticipated to effect livestock, further engagement will be undertaken with parties holding livestock on the scheduling of construction activities. This commitment to engagement is secured in the **Outline Construction Environmental Management Plan [APP-277].**
HF-010	Transport and Access	Traffic Impact	Unworkable Construction Impact & Permanent Highway Damage - The lanes are very narrow and difficult to negotiate. We know this from day to day use of agricultural vehicles and machinery. Two cars can barely pass. The addition of 100's of construction workers cars and HGVs accessing the construction sites and cable route, will cause unacceptable safety hazards, severe disruption to our daily farming operations, and permanent damage to the character and fabric of the lanes used by walkers, cyclists and horse riders.	To ensure operational noise remains within these assessed limits, the **Outline Operational Environmental Management Plan (OEMP) [APP-278]** commits the Applicant to maintaining noise levels at or below those modelled in the ES. These commitments, alongside the safety protocols, are legally secured through Requirement 6 (Battery Safety Management) and Requirement 14 (OEMP) in Schedule 2 of the **Draft Development Consent Order [APP-016]**. The potential effects of construction traffic on the local highway network are assessed in **ES Volume 1, Chapter 13: Transport and Access [APP-065]**, which considers construction vehicle movements, traffic volumes, road safety and effects on road users. This included the capacity of local roads and infrastructure to accommodate construction vehicles with consideration of construction traffic volumes, vehicle types, route suitability, and network performance. The assessment concludes that the level of construction traffic associated with the Scheme is unlikely to materially affect road safety on links within the Study Area, and no significant adverse effects on accident risk are anticipated. The assessment concludes that with appropriate mitigation in place, there would be no significant adverse impacts on the local highway network during the construction, operation and maintenance, and decommissioning phases of the Scheme. This is supported by the conclusions of **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** which finds no significant adverse effects to recreational users of the local highway network as a result of the Scheme. An **OCTMP [APP-287]** supports the DCO Application and presents outline measures which restrict construction deliveries to the proposed construction routes and separates the public and

				recreational users from hazards, including, traffic management measures such as signage and banksmen, fencing, and dust and noise control.
HF-011	Transport and Access	Traffic Impact	- There is a real worry locally that a great proportion of construction traffic accessing from the east will leave the M4 at Junction 17 to access the ENTIRE Lime Down panel area and cable route due to significantly reduced mileage, instead of Junction 18 as currently stated by the applicant. This would cause major disruption, damage to small lanes through Stanton St Quintin and Hullavington (both of which have schools), and danger to local residents. - We ask the examiners to insist on a full detailed analysis of the suitability of the proposed scheme due to the unsuitable nature of the access network of small rural lanes. How would the proposed traffic routes be guaranteed or indeed policed? How would the safety of other road users currently enjoying quiet countryside lanes be addressed?	The proposed construction routes have been carefully assessed and are considered to be the most appropriate routes to the Scheme. Construction traffic would also be temporary and controlled through measures in a CTMP to minimise adverse impacts on the highway network, including within the CNL. An **OCTMP [APP-287]** supports the DCO Application and presents outline measures which restrict construction deliveries to the proposed construction routes. It also includes road condition surveys to ensure any damage to the highway network caused by construction traffic is identified and rectified, management of construction deliveries to avoid the requirement for HGVs generated by the Scheme passing each other in opposite directions on the local roads, and restricted hours of deliveries outside of peak hours. The **OCTMP [APP-287]** includes measures that separate the public and recreational users from hazards, including, traffic management measures such as signage and banksmen, fencing, and dust and noise control, With this mitigation in place, **ES Volume 1, Chapter 13: Transport and Access [APP-065]** concludes that impacts would be negligible to minor adverse. A final CTMP would be prepared post consent and must be substantially in accordance with the **OCTMP [APP-287]** and approved by the relevant local planning authority (in consultation with the relevant highway authority and South Gloucestershire Council), as secured by Requirement 15 in Schedule 2 of the **Draft DCO [APP-016]**. This requirement states that all construction works associated with the authorised development must be carried out in accordance with the approved construction traffic management plan. The Applicant will be required to comply with the various controls and requirements of the made Order or risk committing a criminal offence.

				The potential effects of construction traffic on the local highway network are assessed in **ES Volume 1, Chapter 13: Transport and Access [APP-065]**, which considers construction vehicle movements, traffic volumes, road safety and effects on road users. This included the capacity of local roads and infrastructure to accommodate construction vehicles with consideration of construction traffic volumes, vehicle types, route suitability, and network performance. The assessment concludes that the level of construction traffic associated with the Scheme is unlikely to materially affect road safety on links within the Study Area, and no significant adverse effects on accident risk are anticipated. The assessment concludes that with appropriate mitigation in place, there would be no significant adverse impacts on the local highway network during the construction, operation and maintenance, and decommissioning phases of the Scheme.
HF-012	Landscape and Visual	Scale and Visual Impact	- Inappropriate Scale, Cumulative Impact & Compulsory Acquisition o This industrial-scale development is totally alien to this rural location and would industrialise the countryside for 60 years.	An assessment of landscape and visual effects is provided in the Landscape and Visual Impact Assessment (LVIA) presented in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**. The LVIA assesses effects on identified landscape and visual receptors, including residential properties and users of public rights of way, and identifies where significant effects may occur. The **LVIA [APP-060]** recognises that there would be temporary Moderate Adverse effects on Landscape Character within the 1 km as a result of the change in land use from arable farmland to solar infrastructure. However, the Scheme proposes significant mitigation measures informed by Wiltshire's Nature Recovery Strategyto reduce the effects of the Scheme on landscape character which will provide significant beneficial effects to the fabric of the Sites and the legacy Landscape. The **LVIA [APP-060]** includes an assessment of the cumulative effects of the five Solar Sites making up the Scheme (intra-project cumulative effects) to ensure the effects of the Scheme as a whole are understood. It also assesses the cumulative effects of the Scheme in combination with other similar developments in the area.

HF-013	Site Selection and Alternatives	Scheme Scale and Location	o We support renewable energy in the correct location; we have a 10-year-old solar installation on our farm building roofs and directly use the majority of electricity generated at source. There are currently numerous existing solar installations in the immediate area with more planned. We fully understand farmers need to boost their income by installing sensible sized, sympathetically sited arrays in conjunction with local authorities. BUT we are totally opposed to a scheme the sheer size of the proposed Lime Down NSIP. The unprecedented size and number of vast infrastructures, the amount of food producing land lost, the locality of the BESS, the danger, the distance from the grid connection, the untold damage to the very local fabric of this part of Wiltshire, its views, its ecology, it's archaeology. Projects of this magnitude must be directed to areas far better suited and closer to a grid connection. This scheme it far too large, in the wrong area and so potentially damaging it must be refused.	The Scheme has been designed to deliver the greatest possible benefit from the available land and the available grid connection, whilst avoiding, minimising and/or mitigating harmful environmental effects. As per the description set out in **ES Volume 1, Chapter 3: The Scheme [APP-055]** the total area within the DCO Order Limits encompasses approximately 1,237 hectares (ha). Of this, the 'Solar PV Sites' comprise approximately 749.1 ha of land. Around 479.5 ha of this land is proposed as being required for installation of solar PV, battery storage, and associated infrastructure. The remaining 269.5 ha would provide areas dedicated to ecological mitigation, measurable Biodiversity Net Gain (BNG) delivery, landscaping, offsets and agricultural land managed for environmental enhancement and habitat creation. The Applicant remains committed to delivering a Scheme that makes a meaningful contribution to the UK's transition to net zero, while also seeking to minimise adverse impacts and maximise opportunities for environmental enhancement and community benefits. <u>Agricultural Land and Food Production</u> An assessment of the potential effects of the Scheme on soils and agricultural land is provided in **ES Volume 1, Chapter 17: Soils and Agriculture [APP-069]**. This chapter considers baseline agricultural land quality, including Best and Most Versatile (BMV) land, and assesses likely significant effects arising from construction, operation and decommissioning of the Scheme, together with embedded mitigation measures. The areas of each Agricultural Land Classification (ALC) grade affected by the Scheme are set out in ES Chapter 17, Section 17.7. Of the agricultural land within the Solar PV Sites, approximately 477.4 hectares (around 67%) is classified as Subgrade 3b or Grade 4 and is therefore not BMV land. There is no Grade 1 land, around 30.8 hectares (approximately 4%) of Grade 2 land, and approximately 209.3 hectares (around 29%) of Subgrade 3a land. The distribution of ALC grades is shown in **ES**

				Volume 2, Figure 17-2: Agricultural Land Classification Mapping [APP-172]. The Applicant has had regard to agricultural land quality in the design and site selection process and has sought, where practicable, to locate infrastructure on lower quality land. The Scheme will result in a temporary but long-term and reversible loss of agricultural land for the operational life of the Scheme. As set out in ES Chapter 17, Section 17.10, this gives rise to a temporary, long-term moderate adverse effect on agricultural land overall, and a temporary, long-term major/moderate adverse effect on BMV land, both of which are assessed as significant. These effects are fully reported in the ES and are a matter for the Secretary of State to weigh in the planning balance against the need for the Scheme and its wider benefits. There are no significant permanent effects on agricultural land, as all land will be returned to its original use and condition as far as practicable following decommissioning. The Applicant notes that the approach to assessing the quality of the agricultural land is under further discussion with Natural England and is set out in the relevant Statement of Common Ground to be submitted at Deadline 1. Measures to avoid and minimise effects on soils and agricultural land are embedded within the Scheme design and secured through the DCO. These include the preparation and implementation of a **Soil Resources Management Plan (SRMP) [APP-280]**, which will control soil handling, storage and reinstatement during construction, operation and decommissioning, and a requirement to prepare and implement a Decommissioning Strategy in accordance with the **Outline Decommissioning Strategy [APP-279]**. Through the establishment and maintenance of long-term grassland beneath and between the solar arrays, soil health, quality and structure are anticipated to improve over the lifetime of the Scheme, resulting in a temporary, moderate beneficial effect on soil resources at decommissioning, which is assessed as significant (**ES Volume 1, Chapter 17: Soils and Agriculture**

				[APP-069], Sections 17.10 and 17.12). The Applicant does not consider that food security will be compromised by the Scheme (or solar energy more widely). The latest figures to September 2024 indicate that solar occupied around 21,200 ha of agricultural land in the UK. In 2025, 545,000 ha of arable land in England were left uncropped (source: Department for Environment, Food & Rural Affairs, Agricultural land use in England at 1 June 2025). It should also be noted that food security is not identified as an issue within the suite of Energy National Policy Statements or the National Planning Policy Framework (NPPF). Further, the Government's UK Solar Roadmap (2024) states that solar development is not considered to compromise food security, and that climate change itself poses the greatest long-term risk to food production - a risk which the Scheme directly helps to address by providing a secure, low-carbon source of electricity. Location of the Battery Energy Storage System (BESS) The location of the BESS was determined through an options appraisal and iterative design process, having regard to technical requirements, environmental constraints and potential effects on nearby receptors. The BESS Area is located at Lime Down D, close to the Solar PV Sites and the on-site substation, which provides operational and efficiency benefits, including minimising transmission losses, maximising storage efficiency, supporting grid balancing, and enabling a rapid and reliable response to network fluctuations. Among the options considered for co-locating the BESS with the Solar PV Sites, Lime Down D was identified as the preferred location due to its central position within the Scheme, the presence of existing and proposed screening, its limited proximity to many residential properties, and its relationship with existing infrastructure, including the adjacent railway line. The various chapters of the **ES [APP-052 to APP-265]** assess the likely significant effects arising from the BESS at this location and identify mitigation measures where necessary. Overall, the

				assessment concludes that the siting of the BESS at Lime Down D presents the lowest potential for significant adverse effects when compared with reasonable alternatives. Further detail on the consideration of alternatives, the design evolution of the Scheme and the assessment of potential effects is provided in **ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP-056]**, which sets out the iterative process undertaken to identify the preferred location and layout for the Scheme, including the BESS Area in Section 4.7. BESS Safety The BESS containers proposed for the Scheme will incorporate built-in safety features for fire avoidance, detection and suppression. The Scheme layout also incorporates separation distances between battery containers to ensure that any isolated fire would not become widespread or lead to a major incident. As shown on **ES Volume 2, Figure 3-1: Indicative Site Layout Plan [APP-081]**, the battery containers will be located more than 200 metres from the nearest Public Right of Way and more than 500 metres from any residential receptors. The Applicant notes that the approach to BESS safety is under discussion with Dorset and Wiltshire Fire and Rescue Service (D&WFRS) and is set out in the relevant Statement of Common Ground to be submitted at Deadline 1. Distance to Grid Connection The Applicant confirms that the existing National Grid Melksham substation has been identified as the point of connection. This decision was based on available capacity, network resilience, and strategic grid planning. As explained in **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]**, an initial search area was identified at a 5 km radius from the POC, however this was later expanded as no suitable and available sites within 5 km were identified. The search area was enlarged incrementally to a 20 km radius which is considered by the Applicant to be a viable cable connection distance for a solar project of this scale. The POC and 20 km search area is shown

				on Figure 1, Annex C of **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]**. Further, from an operational perspective, high voltage electricity transmission at 400kV in this case, is specifically designed to minimise energy losses over long distances. As such, the approximate 20km distance involved results in negligible losses. More details on how the Cable Route Corridor has been located and designed can be found in **ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP-056]**. Several factors were considered such as taking as direct a route as possible, whilst following existing features, such as roads; and avoiding sensitive receptors as far as practicable, such as habitat designations, residential and commercial properties, heritage assets, and a large number of land interests. The assessments set out in the various chapters of the **ES [APP-052 to APP-265]** detail what impacts are expected as a result of the Scheme based on the minimum and maximum parameters of the Scheme, and the mitigation and enhancement measures that are proposed to reduce these impacts. <u>Landscape and Visual Effects</u> An assessment of landscape and visual effects are presented in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**. The Landscape and Visual Impact Assessment (LVIA) assesses effects on identified landscape and visual receptors, including residential properties, users of public rights of way and roads, and identifies where significant effects may occur. The LVIA found no significant long term visual effects to residential properties as a consequence of the Scheme. The visual effects of the Scheme are summarised in **ES Volume 3, Appendix 8-3-3 [APP-192]**. Temporary Major/Moderate and Moderate Adverse effects on visual receptors have been recorded across the Scheme during construction and at Year 1. However, for the majority of these receptors, the effects reduce to non – significant levels as a result of the embedded mitigation measures which are set out in Section 8.9 of **ES Volume 1, Chapter**

				8: Landscape and Visual [APP-060] and include landscape buffers, retention of existing hedgerows and woodland, and new planting to provide screening and integration over time. The assessment also identifies that there would be some long-term significant effects on the visual amenity of users of some localised footpaths, as a result of the Scheme. This predominantly relates to locations where footpaths diagonally cross fields and mitigation planting would be inappropriate to landscape character and the legacy landscape. Those receptors which would experience Significant Long Term Visual Effects are listed in Table 8-30 of the **LVIA [APP-060].** The scale of development within the Order Limits has been significantly reduced from the layout assessed in the Preliminary Environmental Information Report (PEIR) through an iterative design process undertaken in response to consultation and in accordance with the mitigation hierarchy to avoid, reduce and mitigate adverse effects. As part of this design evolution, panels along the edge of the Cotswolds National Landscape and along the Fosse Way have been removed. Mitigation measures to address landscape and visual effects are set out in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**, **Figure 3-4-1 to 3-4-5.2 Landscape and Ecology Mitigation Plan [APP-084]** and secured within the **Outline Landscape and Ecological Mitigation Plan (LEMP) [APP-283]** and the **Outline Ecological Protection and Mitigation Strategy (EPMS) [APP-284]**. These documents include proposals for new and enhanced planting, retention of existing hedgerows and woodland, and landscape integration measures to reduce visual effects over time. In addition, the Scheme design incorporates minimum offsets from existing landscape features, including residential properties, ancient woodland, woodland, hedgerows, public rights of way and watercourses, to further limit visual impacts. Although these measures reduce the effects of the Scheme on nearly all receptors, as noted above there are 10 receptors which would experience Significant Visual Effects for the duration of the Scheme as set out Table 8-30 of the **LVIA [APP-060]**. Mitigation measures to address landscape and visual effects are set out in **ES Volume 1, Chapter 8: Landscape and Visual**

				[APP-060], **Figure 3-4-1 to 3-4-5.2 Landscape and Ecology Mitigation Plan [APP-084]**. The preparation, approval and implementation of detailed landscape and ecological management plans, substantially in accordance with the **OLEMP [APP-283]** and **EPMS [APP-284]**, are secured through requirements in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that the identified mitigation measures are delivered and maintained throughout the lifetime of the Scheme. <u>Ecology and Biodiversity</u> Potential impacts on ecology and biodiversity are fully assessed in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**. This assessment considers baseline ecological conditions and evaluates likely significant effects arising during the construction, operation and decommissioning phases of the Scheme. It identifies avoidance, mitigation and enhancement measures to address potential impacts on habitats and protected and notable species. It also identifies opportunities for ecological enhancement, including the creation and long-term management of habitats, and delivery of biodiversity net gain. The assessment concludes that, with the identified embedded and additional mitigation measures in place, no unacceptable significant adverse effects on ecology and biodiversity are anticipated. The Applicant notes that the approach to the assessment in relation to ecology and biodiversity in general is under discussion with Wiltshire Council and Natural England and is set out in the relevant Statements of Common Ground to be submitted at Deadline 1. During construction, specific measures are proposed to avoid disturbance and displacement of wildlife. These include protective buffers around sensitive habitats and features, timing restrictions on vegetation clearance, pre-construction ecological surveys, species-specific mitigation, and pollution prevention controls which are set out in the **Outline Ecological Protection and Mitigation Strategy (OEPMS) [APP-284]**. Measures to protect trees and hedgerows are also set out in **ES Volume 1, Chapter 10: Arboriculture [APP-062]**.

				The Scheme will also result in the cessation of intensive arable farming within the Solar PV Sites. As identified in **ES Volume 1, Chapter 9 [APP-061]**, this is expected to reduce the ongoing application of herbicides and pesticides, supporting improvements in habitat quality over the operational lifetime of the Scheme. The reversion of existing arable land within the Solar PV Sites to predominantly grassland habitats can be expected to benefit a wide range of protected and notable species, as identified in **ES Volume 1, Chapter 9 [APP-061]**. Mitigation and enhancement measures are detailed in the **OLEMP [APP-283]** and the **OEPMS [APP-284]**, which set out habitat creation, species protection measures, buffer zones and long-term ecological management. The preparation, approval and implementation of the detailed Landscape and Ecological Management Plan, substantially in accordance with the **OLEMP [APP-283]**, are secured through Requirement 7 in Schedule 2 of the **Draft Development Consent Order [APP-016]**. The preparation, approval and implementation of the detailed Ecological Protection and Mitigation Strategy, substantially in accordance with the **OEPMS [APP-284]**, are secured through Requirement 8 in Schedule 2 of the **Draft Development Consent Order [APP-016]**. These requirements ensure that ecological protection and enhancement measures are delivered and maintained throughout construction and operation of the Scheme. <u>Archaeology and Cultural Heritage</u> The potential effects of the Scheme on cultural heritage, including archaeological assets dated to the Roman and medieval periods, are fully assessed in **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, supported by detailed technical appendices in **ES Volume 3, Appendices 12-1 to 12-7 [APP-219 to APP-231]**. The chapter considers baseline conditions, identifies built and archaeological heritage assets within the study area, and assesses likely effects during construction, operation and decommissioning, including effects on setting. The chapter

				concluded that, following mitigation, the residual effects on any archaeological assets including Roman and medieval period remains, would be neutral/negligible and therefore not significant (see **Volume 3, Appendix 12-8 Cultural Heritage Impact Assessment Tables [APP-232]**). The assessment is underpinned by extensive desk-based research, geophysical survey and evaluation trenching, as detailed in **ES Volume 3, Appendix 12-2: Archaeological Desk-Based Assessments [APP-220]**, **Appendix 12-4: Archaeological Geophysical Survey Reports [APP-224]**, and **Appendix 12-5: Interim Evaluation Trial Trenching Reports [APP-225]**. Embedded mitigation measures to avoid or reduce harm to heritage assets are set out in Section 12.9 of **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, with additional mitigation measures detailed in Section 12.11. An overarching archaeological mitigation strategy is provided in **ES Volume 3, Appendix 12-6: Outline Archaeological Mitigation Strategy [APP-230]**, which sets out the framework for further archaeological investigation, recording and protection where ground disturbance cannot be avoided. The preparation, approval and implementation of detailed archaeological Written Schemes of Investigation, substantially in accordance with the Outline Archaeological Mitigation Strategy, are secured through Requirement 12 of Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that appropriate protection, recording and mitigation are delivered before and during construction. The Applicant notes that the approach to the assessment has been agreed with Wiltshire Council and the methodology for the mitigation strategy is under discussion with Wiltshire Council and is set out in the relevant Statement of Common Ground to be submitted at Deadline 1.

HF-014	Description and DCO Process	Compulsory Acquisition	o The use of compulsory acquisition powers by an offshore investor to override a local family business's livelihood and legacy is unjust and demonstrates a clear disregard for the community.	The Applicant has sought wherever practicable to reduce the amount of land subject to compulsory acquisition powers and the impact on the local community through an iterative design process responding to consultation feedback, surveys and assessments (presented **in ES Volume 3, Appendix 4-1 Site Selection Assessment Report [APP-185]**). The **Statement of Reasons [APP-018]** sets out the justification for the use of compulsory acquisition powers to implement the Scheme. It also confirms that the Applicant will continue to seek voluntary agreement for the acquisition of land and rights needed to ensure the implementation of the Scheme and the status of ongoing negotiations with affected owners is recorded in the **Land Rights Tracker [APP-021**]. Where compulsory acquisition powers are exercised, appropriate compensation will be available to those entitled under the Compensation Code. The **Funding Statement [APP-019]** confirms that the Applicant has sufficient funds to provide this compensation. The Applicant acknowledges that any adverse effects from the Scheme are more likely to be felt locally than the largely wider-scale benefits of the Scheme. The Scheme is anticipated to help meet the UK's net zero requirements for energy production, which is considered a critical national priority and set out in National Policy Statements for Energy NPS EN-1 (section 4.2) and EN-3. This therefore will benefit the national population rather than just the local population. The benefits of the Scheme are set out in Section 5.3 of the **Planning Statement [APP-267]** and include the delivery of large amounts of cheap, secure, and low carbon electricity which will help the UK to achieve net zero by 2050, ecological and landscape enhancements, biodiversity net gain, permissive paths, employment generation, economic benefits and skills training. The Scheme is also anticipated to benefit the population within approximately 20km of the Scheme, through providing employment and income especially during construction and peak replacement activities and providing skills and training opportunities. Where the Scheme is anticipated to benefit local people more specifically, this is done through providing onsite permissive paths to increase access to the countryside, providing improved

				landscape planting through reinforcing existing hedgerows and planting of new trees, providing biodiversity net gains through habitat improvements. That notwithstanding, the Applicant is committed to providing a Community Benefit Fund to allow for community-driven benefits that are not necessarily associated with the Scheme itself. The purpose is to establish a means to recognise local community needs that the Applicant wants to be able to contribute towards in recognition of the local impact of the Scheme.

4.34 Cllr Jon Atkey

Table 4-34 RR-0914

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
JA-001	Description and DCO Process	Introduction	I object to the so-called Lime Down Solar Park proposal in its entirety. Lime Down is not a real place, and the name itself is misleading: it implies a single, open, downland landscape suitable for industrialisation, when in reality the site comprises a network of villages, hamlets, farms, rights of way, and productive agricultural fields that maintain the distinct identity of multiple rural communities. No form of this proposal - in whole or in part - would be acceptable in this landscape.	As set out in **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185],** the Applicant undertook an initial review which did not identify a single site of the appropriate size (1,100 ha) within the area of search. Therefore, the Applicant considered both contiguous land parcels and land parcels near one another. The **Statement of Need [APP-266]** explains at Section 7.4 that NSIP proposals may comprise adjoining or separate parcels of land and that "*the connection of separate parcels of suitable land together into a single scheme may, subject to analysis, enable those parcels of land to connect economically to the electricity system*" which is the case for this scheme. Section 8.2 of the **Statement of Need [APP-266]** explains that by bringing the parcels together into a single scheme, the Scheme is able to carry a connection to the National Electricity Transmission System (NETS), thus providing a local source of low carbon electricity and also enabling the efficient bulk transfer of energy generated at the Scheme so that any surplus can be used to cover shortfalls elsewhere. By connecting to the NETS, the Scheme will not impact the feasibility or timing of distribution network connections for either new generation or consumption connections which among other things are required to support the delivery of Wiltshire County Council's growth plans. The Scheme has been designed to deliver the greatest possible benefit from the available land and the available grid connection, whilst avoiding, minimising and/or mitigating harmful environmental effects. As per the description set out in **ES Volume 1, Chapter 3: The Scheme [APP-055]** the total area within the DCO Order Limits encompasses approximately 1,237 hectares (ha). Of this, the 'Solar PV Sites' comprise approximately 749.1 ha of land. Around 479.5 ha of this land is proposed as being required for

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				installation of solar PV, battery storage, and associated infrastructure. The remaining 269.5 ha would provide areas dedicated to ecological mitigation, measurable Biodiversity Net Gain (BNG) delivery, landscaping, offsets and agricultural land managed for environmental enhancement and habitat creation. The Applicant remains committed to delivering a Scheme that makes a meaningful contribution to the UK's transition to net zero, while also seeking to minimise adverse impacts and maximise opportunities for environmental enhancement and community benefits. <u>Landscape and Visual</u> An assessment of landscape and visual effects are presented in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**. The Landscape and Visual Impact Assessment (LVIA) assesses effects on identified landscape and visual receptors, including residential properties, users of public rights of way and roads, and identifies where significant effects may occur. The LVIA found no significant long term visual effects to residential properties as a consequence of the Scheme. The visual effects of the Scheme are summarised in **ES Volume 3, Appendix 8-3-3 [APP-192]**. Temporary Major/Moderate and Moderate Adverse effects on visual receptors have been recorded across the Scheme during construction and at Year 1. However, for the majority of these receptors, the effects reduce to non –significant levels as a result of the embedded mitigation measures which are set out in Section 8.9 of **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]** and include landscape buffers, retention of existing hedgerows and woodland, and new planting to provide screening and integration over time.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				The assessment also identifies that there would be some long-term significant effects on the visual amenity of users of some localised footpaths, as a result of the Scheme. This predominantly relates to locations where footpaths diagonally cross fields and mitigation planting would be inappropriate to landscape character and the legacy landscape. Those receptors which would experience Significant Long Term Visual Effects are listed in Table 8-30 of the **LVIA [APP-060].** The scale of development within the Order Limits has been significantly reduced from the layout assessed in the Preliminary Environmental Information Report (PEIR) through an iterative design process undertaken in response to consultation and in accordance with the mitigation hierarchy to avoid, reduce and mitigate adverse effects. As part of this design evolution, panels along the edge of the Cotswolds National Landscape and along the Fosse Way have been removed. Mitigation measures to address landscape and visual effects are set out in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**, **Figure 3-4-1 to 3-4-5.2 Landscape and Ecology Mitigation Plan [APP-084]** and secured within the **Outline Landscape and Ecological Mitigation Plan (LEMP) [APP-283]** and the **Outline Ecological Protection and Mitigation Strategy (EPMS) [APP-284]**. These documents include proposals for new and enhanced planting, retention of existing hedgerows and woodland, and landscape integration measures to reduce visual effects over time. In addition, the Scheme design incorporates minimum offsets from existing landscape features, including residential properties, ancient woodland, woodland, hedgerows, public rights of way and watercourses, to further limit visual impacts. Although these measures reduce the effects of the Scheme on nearly all receptors, as noted above there are 10 receptors which would experience Significant Visual Effects for

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				the duration of the Scheme as set out Table 8-30 of the **LVIA [APP-060]**. Mitigation measures to address landscape and visual effects are set out in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**, **Figure 3-4-1 to 3-4-5.2 Landscape and Ecology Mitigation Plan [APP-084]**. The preparation, approval and implementation of detailed landscape and ecological management plans, substantially in accordance with the **OLEMP [APP-283]** and **EPMS [APP-284]**, are secured through requirements in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that the identified mitigation measures are delivered and maintained throughout the lifetime of the Scheme. <u>Public Rights of Way</u> A detailed assessment of the likely significance of effects from the Scheme on the use and desirability of individual PRoW and recreational access to the countryside is included in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** and **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]**. This assessment considers the impact on individual recreational routes, including their practical use, enjoyment and desirability. The Applicant confirms that the majority of significant adverse effects can be mitigated. However, some significant adverse effects to users of PRoW and unsurfaced roads in Lime Down E during construction cannot be mitigated further. No significant residual effects are anticipated during the operational phase of the Scheme. The assessment in **ES Volume 1, Chapter 18: Human Health [APP-070]** also considers the physical and mental health impacts of changes to recreation and countryside access under the assessment topic 'open space, leisure and play', and concludes that no significant adverse effects are anticipated at any phase of the Scheme.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				The Applicant confirms that existing PRoW are to be controlled within the Scheme design, with management measures set out in the **Outline Public Rights of Way and Permissive Paths Management Plan (PROWPPMP) [APP-282]**, confirmed as embedded mitigation in Section 16.9 of ES Chapter 16. New permissive access routes have been incorporated into the Scheme design, shown as Work No. 10 on the **Works Plan [APP-007]** and illustrated on **ES Volume 2, Figure 3-4: Landscape and Ecology Mitigation Plan [APP-084]**. These are identified as additional mitigation and enhancement measures in Section 16.11 of ES Chapter 16. The PRoW and Permissive Paths Management Plan is secured through Requirement 16 of Schedule 2 of the **Draft Development Consent Order [APP-016]**. The preparation, approval and implementation of the detailed Construction Environmental Management Plan and Construction Traffic Management Plan, substantially in accordance with the outline plans, are secured through Requirements 13 and 15 respectively in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that impacts on PRoW and recreational routes are appropriately managed during construction. The approach to recreation and access has been discussed with Wiltshire Council's Public Health team and is under discussion with Wiltshire Council's Countryside Access Team and is set out in the relevant Statement of Common Ground to be submitted at Deadline 1. <u>Use of Agricultural Land</u> An assessment of the potential effects of the Scheme on soils and agricultural land is provided in **ES Volume 1, Chapter 17 Soils and Agriculture [APP-069]**. This chapter considers baseline agricultural land quality, including Best and Most Versatile (BMV) land, and assesses likely significant effects

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				arising from construction, operation and decommissioning of the Scheme, together with embedded mitigation measures. The areas of each Agricultural Land Classification (ALC) grade affected by the Scheme are set out **in ES Volume 1, Chapter 17: Soils and Agricultural Land [APP-069]** Section 17.7. Of the agricultural land within the Solar PV Sites, approximately 477.4 hectares (around 67%) is classified as Subgrade 3b or Grade 4 and is therefore not BMV land. There is no Grade 1 land, around 30.8 hectares (approximately 4%) of Grade 2 land, and approximately 209.3 hectares (around 29%) of Subgrade 3a land. The distribution of ALC grades is shown in **ES Volume 2, Figure 17-2: Agricultural Land Classification Mapping [APP-172]**. The Applicant has had regard to agricultural land quality in the design and site selection process and has sought, where practicable, to locate infrastructure on lower quality land. The Scheme will result in a temporary but long-term and reversible loss of agricultural land for the operational life of the Scheme. As set out in Section 17 of **ES Volume 1, Chapter 17: Soils and Agricultural Land [APP-069]**, this gives rise to a temporary, long-term moderate adverse effect on agricultural land overall, and a temporary, long-term major/moderate adverse effect on BMV land, both of which are assessed as significant. These effects are fully reported in the ES and are a matter for the Secretary of State to weigh in the planning balance against the need for the Scheme and its wider benefits. There are no significant permanent effects on agricultural land, as all land will be returned to its original use and condition as far as practicable following decommissioning. The Applicant notes that the approach to assessing the quality of the agricultural land is under discussion with Natural England and is set out in the relevant Statement of Common Ground to be submitted at Deadline 1.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				Measures to avoid and minimise effects on soils and agricultural land are embedded within the Scheme design and secured through the DCO. These include the preparation and implementation of a **Soil Resources Management Plan (SRMP) [APP-280]**, which will control soil handling, storage and reinstatement during construction, operation and decommissioning, and a requirement to prepare and implement a Decommissioning Strategy in accordance with the **Outline Decommissioning Strategy [APP-279]**. Through the establishment and maintenance of long-term grassland beneath and between the solar arrays, soil health, quality and structure are anticipated to improve over the lifetime of the Scheme, resulting in a temporary, moderate beneficial effect on soil resources at decommissioning, which is assessed as significant (Sections 17.10 and 17.12 of **ES Volume 1, Chapter 17: Soils and Agricultural Land [APP-069]**).
JA-002	Other Environmental Matters	BESS Location and Safety	The development is industrial in scale, covering 2,000 to 3,000 acres of agricultural land and placing major infrastructure - including a Battery Energy Storage System (BESS), substation, and solar arrays - just 300 metres from homes. The entire village of Hullavington would lie within one mile of the proposed BESS itself, meaning every resident would be directly exposed to the risks, impacts, and consequences of this installation. This proximity is not merely a matter of visual or acoustic intrusion. It represents a civil contingency level	As the precise location of the BESS will be determined in the detailed design stage, the Applicant has provided a BESS Area as part of the Scheme within which the site of the BESS would be located [REF to Works Plans]. In order to understand the impacts of the BESS within this wider area, six worst case BESS fire locations (i.e. locations within the BESS Area closest to sensitive receptors) have been modelled as depicted in **ES Volume 2, Figure 15-5: Battery Energy Storage System Fire Emissions Study Area [APP-166].** The Concentrations of carbon monoxide (CO), formaldehyde, hydrogen chloride (HCl), hydrogen cyanide (HCN), hydrogen fluoride (HF), ammonia (NH_3), nitrogen dioxide (NO2) and particulates from a potential BESS fire have been modelled using an air quality dispersion model to determine the likely effects on human health. A high-level visibility assessment has also been undertaken using the modelled particulates results to determine the effect

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			risk too serious to contemplate. Large scale lithium battery systems carry internationally recognised hazards associated with thermal runaway, fire, explosion, and toxic plume generation. These events are rare but catastrophic, and emergency planners treat them with extreme caution. No credible mitigation has been proposed for a failure event of this nature - and in reality, none could be envisaged. The applicant has not demonstrated how a major incident could be contained, controlled, or prevented from affecting the village, the school, the surrounding communities, or the nearby mainline railway. The siting of the BESS so close to homes and critical infrastructure is wholly inappropriate and represents an unacceptable and unmanageable risk to public safety.	of BESS fire emissions on visibility on the local road and rail network to inform the **Outline Battery Safety Management Plan (OBSMP) [APP-286]**. The Plume Assessment Study has concluded that there are no significant toxic emission or visibility impacts at all sensitive receptor locations. The Applicant has also committed to commissioning an additional Plume Analysis Study at the detailed design stage of the project as stipulated in Section 5.5.9 of the OBSMP and secured through Requirement 6 of the **Draft DCO [APP-016]**. The Applicant has followed National Fire Chiefs Council (NFCC) guidance and commissioned a Plume Assessment Study to model toxic gas emissions and visibility impacts from a BESS fire on all sensitive receptors within a 1km radius of the BESS area. The fire emissions modelled in the report were based upon recent UK Health Security Agency (UKHSA) requests for DCO BESS projects which explore both immediate air quality impacts together with annual UK air quality requirements. The UKHSA is a statutory consultee for the Scheme and has confirmed that they are satisfied with the Applicant's submitted documentation and Plume Assessment Study. The Plume Assessment Study has concluded that there are no significant toxic emission or visibility impacts at all sensitive receptor locations. The Applicant has also committed to commissioning an additional Plume Analysis Study at the detailed design stage (see: Section 5.5.9 of the **OBSMP [APP-286]**). The Applicant has prepared an **OBSMP [APP-286]** for the Scheme using guidance from Dorset and Wiltshire Fire and Rescue Service and incorporating recommendations of the National Fire Chiefs Council. This includes listing safety objectives for the design of the BESS site in Section 2.4, including that "*Final BESS design and site layout will have been validated through mandatory Large Scale Fire Testing*

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				(LSFT)" (Section 2.4.2). The **OBSMP [APP-286]** will be amended at Deadline 1 to fully accommodate the latest BESS safety requirements contained in NFPA 855 (2026) ensuring that any credible risks associated with battery storage are either prevented or fully mitigated if a BESS failure occurs. As mandated under the National Fire Protection Association (NFPA) 855 (2026) the Applicant will only be able to select a BESS system that has undertaken Large Scale Fire Testing (LSFT). At the detailed design stage, the selected BESS LSFT data will be leveraged to fully inform inputs for risk assessment tools which will be utilised together with detailed consequence modelling to provide a comprehensive site operations and emergency response safety audit, this is stipulated in the **OBSMP [APP-286]** pre-construction requirements (Section 6). As set out in the **OBSMP [APP-286]**, the BESS Area will have a robust and validated Emergency Response Plan (ERP), developed in consultation with Dorset & Wiltshire Fire and Rescue Service at the detailed design stage. Section 5.4 of the OBSMP specifies the typical emergency response protocols, procedures and safety information that will be included in ERPs. ERPs will be drafted and approved for all stages of the Scheme, including construction, operation, and decommissioning. The Applicant's ERP template includes all requirements specified in both NFCC and NFPA 855 guidance and recommendations. Section 5 of the **OBSMP [APP-286]** covers all requisite firefighting requirements for the Scheme including fire service access, firefighting water supply, and emergency planning requirements. Final comprehensive risk assessment reports, BESS design and site-specific consequence modelling, and detailed Emergency Response Plans (ERPs) can only be drafted when based upon the specific BESS design selected at the detailed design stage. Key safety content requires that all equipment within the BESS area is defined, battery system operating

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				limits and test data are fully defined, and the BESS failure protection system is defined. Incident response tactics require significant test data and rigorous consequence modelling from the specific BESS design to develop safe protocols for incident response. All risk assessments to be conducted at detailed design for BESS projects required by the Health and Safety Executive (HSE) to assess fire and explosion risk are stipulated in Section 6.1.5 of the **OBSMP [APP-286]**. Further explosion prevention, mitigation, and safety requirements for the Scheme are stipulated in the **OBSMP [APP-286]** Sections: 1.1.6 – 1.1.7, 4.1.3 – 4.1.10, 4.1.18, 4.1.27, 4.1.30 - 4.1.33, 4.1.36 – 4.1.39, 5.1.3, and 5.1.6. The Applicant is currently drafting a Statement of Common Ground (SOCG) with the Environment Agency (EA) on Scheme environmental protection issues including the BESS area drainage strategy. The agreed strategy document will be appended to the OBSMP at Deadline 1, to provide further assurance that all water pollution risks from a BESS fire are fully mitigated. The EA is a statutory consultee for the OBSMP and drainage strategies and must approve the final BSMP and drainage design at detailed design before construction of the BESS commences. The **OBSMP [APP-286]** is secured through Requirement 6 (Battery safety management) in Schedule 2 of the **Draft DCO [APP-016]**, which provides that Work No. 2 must not commence until a Battery Safety Management Plan has been submitted to and approved by the relevant planning authority. The approved plan must be substantially in accordance with the **OBSMP [APP-286]**. The Draft DCO also requires the relevant planning authority to consult with Dorset and Wiltshire Fire and Rescue Service and the Environment Agency before determining the application, and that the Battery Safety Management Plan must be implemented as approved.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
JA-003	Other Environmental Matters	BESS Noise and Lighting	I object to the BESS for additional reasons: continuous noise emissions, visual intrusion, and operational lighting that would permanently destroy the tranquillity of the area. The predicted *"incessant hum*" from cooling fans, inverters, and transformers would severely impact residents' ability to sleep, enjoy their homes, or use their gardens.	The noise impacts from the operation of the Scheme and its components, including the BESS, are assessed in Section 14.10 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**, with supporting modelling provided in **ES Volume 3, Appendix 14-4: Noise Modelling [APP-237]**. The assessment considers operational noise from all Scheme infrastructure, including the BESS, using realistic worst-case design parameters. A penalty has been applied to predicted noise levels from the Solar PV Sites to account for the distinctive nature of the sound. The Applicant notes that the approach to noise from BESS has been discussed with Wiltshire Council, as described in Section 14.2 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**. Potential mitigation measures are detailed in Section 14.9 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**, and with these measures in place, significant effects from operational noise are not expected. The **Outline Operational Environmental Management Plan [APP-278]** commits to noise levels from the Scheme at residential dwellings being the same as or below those modelled in the ES. This provides reassurance that significant effects from operational noise will be avoided while allowing flexibility in how this is achieved. The preparation, approval and implementation of the detailed OEMP, substantially in accordance with the outline plan, are secured through Requirement 14 of Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring operational noise from the BESS and other Scheme components is appropriately controlled throughout the lifetime of the Scheme.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				The potential effects of lighting were considered within the Landscape and Visual Impact Assessment (LVIA) in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**, which considers the implications of construction, operational and decommissioning lighting on landscape and visual receptors. No significant effects of lighting, above those recorded for landscape and visual receptors, were recorded. The LVIA has considered the construction, operational and decommissioning lighting proposals for the Scheme, with details of lighting design, directionality and intermittent lighting set out in **ES Volume 1, Chapter 3: The Scheme [APP-055]** and further discussed in **ES Volume 1, Chapter 20: Other Environmental Matters [APP-072]**. The Scheme has been designed to minimise the need for external lighting. Lighting is not required within the Solar PV Arrays during the operational phase. Motion-sensing security lighting will be provided within substations and the BESS Area and will be used only for maintenance and security purposes. Temporary site lighting during construction and decommissioning will be required to enable safe working during hours of darkness. This lighting will be designed, as far as reasonably practicable, to minimise light spill outside the Site and Cable Route Corridor, particularly towards residential properties, highways and ecological receptors. Standard good practice measures will be employed to minimise glare and light spill during construction, operation and decommissioning. There will be no lighting on perimeter fencing. Measures to control construction lighting are set out in the **Outline Construction Environmental Management Plan (OCEMP) APP-277]**, and operational lighting controls form part of the **Outline Operational Environmental Management Plan [APP-278]**. The preparation, approval and implementation of detailed management plans, substantially in

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				accordance with these outline plans, are secured through requirements in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring lighting impacts are appropriately controlled throughout the lifetime of the Scheme. An assessment of landscape and visual effects is provided in the LVIA presented in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**. The LVIA assesses effects on identified landscape and visual receptors, including residential properties and users of public rights of way, and identifies where significant effects may occur. The LVIA found no significant long term visual effects to Residential Properties as a consequence of the Scheme. In addition, the Scheme design incorporates minimum offsets from existing landscape features, including residential properties, ancient woodland, woodland, hedgerows, public rights of way and watercourses, to further limit visual impacts. The preparation, approval and implementation of detailed landscape and ecological management plans, substantially in accordance with the **OLEMP [APP-283]** and **OEPMS [APP-284]**, are secured through requirements in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that the identified mitigation measures are delivered and maintained throughout the lifetime of the Scheme.
JA-004	Transport and Access	Traffic Impacts	I object to the construction traffic proposals, which rely on narrow rural lanes that are physically incapable of safely accommodating the volume of HGVs required. Independent analysis shows the applicant has underestimated traffic by over 40%, meaning more than 100 HGV movements per day on single-track	The proposed construction routes have been carefully assessed and are considered to be the most appropriate routes to the Scheme. These do not directly pass any schools. Construction traffic would also be temporary and controlled through measures in the **OCTMP [APP-287]**. The Applicant notes that independent analysis of construction HGV trip generation has not been provided so is unable to comment on this at this stage.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			roads used by schoolchildren, walkers, cyclists, and local residents. This creates an unacceptable and unmanageable safety risk, particularly where there are no pavements, limited verges, blind bends, and multiple public rights of way.	The Applicant has predicted the worst-case construction traffic flows for the Scheme based on a realistic breakdown of construction materials, such as aggregate and number of modules. Calculations are provided in Annex E of **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]**. Further detail of trip generation will also be added to **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]** and resubmitted at Deadline 1 of Examination. The potential impact of the Scheme on non-motorised users (NMU) is assessed in **ES Volume 1, Chapter 13: Transport and Access [APP-065]** which concludes that there would be no significant impact on NMU as a result of the Scheme. Highway widths of construction routes have been assessed and provide sufficient width for HGV traffic to comfortably pass cyclists and equestrians and, as there is a lack of pedestrian infrastructure (such as pavements) along construction routes, these are considered to be unattractive as walking routes so an increase in HGV construction traffic would not result in a significant adverse impact. An **OCTMP [APP-287]** and **Outline Public Rights of Way and Permissive Paths Management Plan [APP-282]** support the DCO Application and includes outline measures to ensure impacts to NMU along highways and PRoW are minimised as far as practicable. A final CTMP and Public Rights of Way and Permissive Paths Management Plan would be prepared post consent and must be substantially in accordance with the **OCTMP [APP-287]** and **Outline Public Rights of Way and Permissive Paths Management Plan [APP-282]**, respectively, and approved by the relevant local planning authorities (in consultation with the relevant highway authorities), as secured by Requirement 15 and Requirement 16 in Schedule 2 of the **Draft DCO [APP-016]**.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
JA-005	Socio-Economics, Tourism and Recreation	PRoW and Cycle Path Impacts	I object to the severe impacts on active travel, local walks, and the Wiltshire Cycleway. The frequency of HGVs - one every six minutes - would intimidate vulnerable users, deter people from walking and cycling, and destroy the amenity value of routes that are central to community life and local tourism.	The potential impact of the Scheme on non-motorised users (NMU) is assessed in **ES Volume 1, Chapter 13: Transport and Access [APP-065]** which concludes that there would be no significant impact on NMU as a result of the Scheme. Highway widths of construction routes have been assessed and provide sufficient width for HGV traffic to comfortably pass cyclists and equestrians and, as there is a lack of pedestrian infrastructure (such as pavements) along construction routes, these are considered to be unattractive as walking routes so an increase in HGV construction traffic would not result in a significant adverse impact. An **OCTMP [APP-287]** and **Outline Public Rights of Way and Permissive Paths Management Plan [APP-282]** support the DCO Application and includes outline measures to ensure impacts to NMU along highways and PRoW are minimised as far as practicable. The **OCTMP [APP-287]** confirms that construction deliveries will be managed to avoid the requirement for HGVs generated by the Scheme passing each other in opposite directions on the local roads and restricted to outside of peak hours. With these measures in place, **ES Volume 1, Chapter 13: Transport and Access [APP-065]** concludes that the impact would be negligible to minor adverse. A final CTMP and Public Rights of Way and Permissive Paths Management Plan would be prepared post consent and must be substantially in accordance with the **OCTMP [APP-287]** and **Outline Public Rights of Way and Permissive Paths Management Plan [APP-282]**, respectively, and approved by the relevant local planning authorities (in consultation with the relevant highway authorities), as secured by Requirement 15 and Requirement 16 in Schedule 2 of the **Draft DCO [APP-016]**. The Applicant confirms that consideration of impacts to PROWs, unsurfaced roads, and the recreational use of the

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				highway network has been assessed in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** and the supporting **ES Volume 3 Appendix 16-2 Tourism and Recreation Receptor Tables [APP-241]**. The Applicant confirms that the majority of significant adverse effects can be mitigated, however, understands that some significant adverse effects to users of routes in Lime Down E or regionally important long-distance recreational routes cannot be mitigated further during construction. The assessment has considered the impacts to individual routes to build a picture of the likely impact on the overall PROW and highway network, determining that the overall effects within the 2 km Study Area is not a significant adverse effect at any stage of the Scheme. This is largely owing to the large number of PROWs and rural routes, given a great level of optionality to users, even in the presence of the Scheme. The Applicant has assessed the likely effects on The Wiltshire Way in **ES Volume 3 Appendix 16-2 Tourism and Recreation Receptor Tables [APP-241]**. This assessment considers transport matters (safety and delay) but also user experience, amenity and desirability. As a result of the Scheme, and the implementation of mitigation measures to protect cyclist on this route, the Scheme is anticipated to generate a significant adverse effect to users of the Wiltshire Way during construction and decommissioning. The Scheme is however not anticipated to generate any long-term significant adverse effect on users of The Wiltshire Way during the Scheme's operational phase.
JA-006	Socio-Economics, Tourism and Recreation	PRoWs	In particular, I object to the profound impact on the popular Walks Around Hullavington routes, which are enjoyed daily by residents and visitors and are publicly available via the Hullavington Community website - https://hullavington.org/hullavington-	The Applicant confirms that consideration of impacts to PRoW, unsurfaced roads, and the recreational use of the highway network has been assessed in **ES Volume 1 Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** and the supporting **ES Volume 3 Appendix 16-2 Tourism and Recreation Receptor Tables [APP-241]**. The routes used for the Hullavington Walks have been assessed therein. The

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			walks/. Walks 1, 2, 3, 4, 6, 7, 8 and 9 all rely on the tranquillity, open views, wildlife, and quiet lanes that define this landscape. Many of these routes use the very lanes and rights of way that would be dominated by HGV traffic, construction noise, dust, and industrial fencing. What are currently peaceful, restorative walks would become unpleasant, unsafe, and in some cases effectively unusable. These walks are not incidental; they are part of the parish's identity, wellbeing, and social fabric. They connect residents to nature, link villages, support local businesses, and attract visitors. The proposal would destroy the qualities that make these routes special, replacing them with noise, intimidation, and industrialisation.	Applicant confirms all routes except routes 1, 3, and 5 interact with Order Limits to some extent. No significant adverse effects (i.e. no greater than moderate-minor adverse effects) to these Hullavington Walks routes are anticipated as a result of the Scheme, subject to implementation of embedded and additional mitigation measures as secured through the **OCTMP [APP-287]** and **Outline Public Rights of Way and Permissive Paths Management Plan [APP-282]**, secured respectively by Requirements 15 and 16 in Schedule 2 to the **Draft DCO [APP-016]**. The Applicant seeks to confirm that HGV access for construction is only proposed in this location along the Hullavington-Norton Road to access Lime Down D. The road at Surrendell Farm is only required to facilitate construction of an emergency access to the BESS Site. HGV traffic associated with Lime Down C is only anticipated to cross Pig Lane at a controlled crossing point south of the railway line. PRoW will only be protected by fencing where they go through Solar PV Areas. In this instance, deerstock fencing is proposed, and this will be set back no less than 15 m from the PROW centreline. Elsewhere, either landscape planting will be introduced to reduce visual impacts from nearby elements of the Scheme, or views from PROWs away from the Scheme will be left open. This is shown on **ES Volume 2, Figures 3-4-1 to 3-4-5.2 [APP-084]** based on the indicative Scheme design and is secured in principle through the **OLEMP [APP-283]** by Requirement 7 in Schedule 2 to the **Draft DCO [APP-016]**. The Applicant has assessed the impacts of the Scheme on community, social, and personal wellbeing in **ES Volume 1 Chapter 18: Human Health [APP-070]**, wherein the assessment has determined that there are no significant adverse effects to health and wellbeing as a result of the Scheme at any phase.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
JA-007	Landscape and Visual Ecology and Biodiversity	Fencing	I object to the environmental and landscape harm caused by industrial fencing, large-scale visual structures, and the fragmentation of wildlife habitats.	An assessment of landscape and visual effects are presented in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**. The Landscape and Visual Impact Assessment (LVIA) assesses effects on identified landscape and visual receptors, including residential properties, users of public rights of way and roads, and identifies where significant effects may occur. The LVIA found no significant long term visual effects to residential properties as a consequence of the Scheme. The visual effects of the Scheme are summarised in **ES Volume 3, Appendix 8-3-3 [APP-192]**. Temporary Major/Moderate and Moderate Adverse effects on visual receptors have been recorded across the Scheme during construction and at Year 1. However, for the majority of these receptors, the effects reduce to non –significant levels as a result of the embedded mitigation measures which are set out in Section 8.9 of **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]** and include landscape buffers, retention of existing hedgerows and woodland, and new planting to provide screening and integration over time. The assessment also identifies that there would be some long-term significant effects on the visual amenity of users of some localised footpaths, as a result of the Scheme. This predominantly relates to locations where footpaths diagonally cross fields and mitigation planting would be inappropriate to landscape character and the legacy landscape. Those receptors which would experience Significant Long Term Visual Effects are listed in Table 8-30 of the **LVIA [APP-060].** The scale of development within the Order Limits has been significantly reduced from the layout assessed in the Preliminary Environmental Information Report (PEIR) through an iterative design process undertaken in response to consultation and in accordance with the mitigation

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				hierarchy to avoid, reduce and mitigate adverse effects. As part of this design evolution, panels along the edge of the Cotswolds National Landscape and along the Fosse Way have been removed. Mitigation measures to address landscape and visual effects are set out in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**, **Figure 3-4-1 to 3-4-5.2 Landscape and Ecology Mitigation Plan [APP-084]** and secured within the **Outline Landscape and Ecological Mitigation Plan (LEMP) [APP-283]** and the **Outline Ecological Protection and Mitigation Strategy (EPMS) [APP-284]**. These documents include proposals for new and enhanced planting, retention of existing hedgerows and woodland, and landscape integration measures to reduce visual effects over time. In addition, the Scheme design incorporates minimum offsets from existing landscape features, including residential properties, ancient woodland, woodland, hedgerows, public rights of way and watercourses, to further limit visual impacts. Although these measures reduce the effects of the Scheme on nearly all receptors, as noted above there are 10 receptors which would experience Significant Visual Effects for the duration of the Scheme as set out Table 8-30 of the **LVIA [APP-060]**. Mitigation measures to address landscape and visual effects are set out in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**, **Figure 3-4-1 to 3-4-5.2 Landscape and Ecology Mitigation Plan [APP-084]**. The preparation, approval and implementation of detailed landscape and ecological management plans, substantially in accordance with the **OLEMP [APP-283]** and **EPMS [APP-284]**, are secured through requirements in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that the identified mitigation measures are delivered and maintained throughout the lifetime of the Scheme.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				Potential effects of boundary treatments and fencing on ecology and wildlife movement are assessed in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**, which considers impacts on habitats and species during construction, operation and decommissioning and identifies measures to avoid or mitigate barriers to wildlife movement. The Scheme design incorporates fencing around the Solar PV Arrays that is permeable to wildlife, with the exception of deer. This means animals (excluding deer only) will be able to freely access habitats within the Solar PV Sites without the need for wildlife gates. In addition, wide buffers are retained around the peripheries of the Solar PV Sites to allow wildlife, including deer, to move between favoured habitats. These measures are described in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]** and detailed in the **OEPMS [APP-284]**. Fencing will be subject to regular inspection and maintenance to ensure continued permeability to wildlife and effective functioning over the lifetime of the Scheme. Measures for ongoing ecological management and maintenance are set out in the **OLEMP [APP-283]**. The preparation, approval and implementation of the detailed Ecological Protection and Mitigation Strategy and Landscape and Ecological Management Plan, substantially in accordance with the **OEPMS [APP-284]** and **OLEMP [APP-283]**, are secured through Requirements 8 and 7 respectively in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that fencing design and maintenance measures are delivered and maintained throughout the lifetime of the Scheme.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
JA-008	Landscape and Visual	Landscape Recovery Objectives	The proposal contradicts local and national Landscape Recovery objectives by creating impermeable barriers that block natural wildlife movement and erode the rural character of the area.	Potential effects of boundary treatments and fencing on ecology and wildlife movement are assessed in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**, which considers impacts on habitats and species during construction, operation and decommissioning and identifies measures to avoid or mitigate barriers to wildlife movement. The Scheme design incorporates fencing around the Solar PV Arrays that is permeable to wildlife, with the exception of deer. This means animals (excluding deer only) will be able to freely access habitats within the Solar PV Sites without the need for wildlife gates. In addition, wide buffers are retained around the peripheries of the Solar PV Sites to allow wildlife, including deer, to move between favoured habitats. These measures are described in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]** and detailed in the **Outline Ecological Protection and Mitigation Strategy (OEPMS) [APP-284]**. Fencing will be subject to regular inspection and maintenance to ensure continued permeability to wildlife and effective functioning over the lifetime of the Scheme. Measures for ongoing ecological management and maintenance are set out in the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]**. The preparation, approval and implementation of the detailed Ecological Protection and Mitigation Strategy and Landscape and Ecological Management Plan, substantially in accordance with the **OEPMS [APP-284]** and **OLEMP [APP-283]**, are secured through Requirements 8 and 7 respectively in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that fencing design and maintenance measures are delivered and maintained throughout the lifetime of the Scheme. The landscape and visual effects of the Scheme, including the

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				effectiveness of proposed mitigation, are assessed in the Landscape and Visual Impact Assessment (LVIA) presented in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**. The LVIA assesses the Scheme using realistic worst-case design parameters and identifies where significant effects may occur, taking into account embedded mitigation. The Scheme design has been informed by an iterative design process and incorporates a comprehensive package of embedded mitigation measures to avoid, reduce and mitigate landscape and visual effects. These measures include sensitive siting, reductions to the Scheme boundary, minimum offsets from key receptors, retention of existing vegetation, and the provision of new landscape planting and enhancement. The LVIA assesses the effectiveness of these mitigation measures over time and concludes that, in many locations, landscape and visual effects would reduce as mitigation planting establishes and matures. NPS EN-1 recognises at para 5.10.5 that "*Virtually all nationally significant energy infrastructure projects will have adverse effects on the landscape, but there may also be beneficial landscape character impacts arising from mitigation.*" Details of the mitigation measures and their long-term management are set out in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**, Figure 3-4-1 to 3-4-5.2 in the **OEPMS [APP-084]** and the **OLEMP [APP-283]**. The preparation, approval and implementation of the detailed Landscape and Ecological Management Plan, substantially in accordance with the **OLEMP [APP-283]**, are secured through Requirement 7 in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that the identified mitigation measures are delivered and maintained throughout the lifetime of the Scheme.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
JA-009	Description and DCO Process	Conclusion	Crucially, I object because the impacts extend far beyond Hullavington. The land within and around the proposed site is a shared rural asset used daily by residents from Norton, Foxley, Corston, Rodbourne, Sherston, Grittleton, and many other communities. They rely on this landscape for its rights of way, tranquillity, open views, wildlife, and the sense of separation between settlements. The proposal would industrialise these shared spaces, replacing a permeable, wildlife-'rich environment with fencing, noise, traffic, and infrastructure that would degrade the experience for every community around the site. This is not a localised impact. It is a 'regional loss of amenity', affecting thousands of people who walk, cycle, ride, and enjoy this landscape as part of their daily lives. The proposal would erase the rural qualities that bind these communities together and define this part of the South Cotswolds. In summary, the so-called 'Lime Down Solar Park' is a misnamed, inappropriate, and fundamentally unacceptable industrial proposal. It places an intolerable burden on Hullavington and its neighbouring villages, industrialises a cherished landscape, endangers residents,	A detailed assessment of the likely significance of effects from the Scheme on the use and desirability of individual PRoWs and recreational access to the countryside is included in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** and **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]**. This assessment considers the impact on individual recreational routes, including their practical use, enjoyment and desirability. The assessment finds no significant residual effects to individual PROWs or the PROW network overall. However, residual significant effects are anticipated to some long-distance recreation routes during all phases of the Scheme due to their regional or national importance. The assessment in **ES Volume 1, Chapter 18: Human Health [APP-070]** goes on to assess the physical and mental health impacts of changes to recreation and countryside access under the assessment topic 'open space, leisure and play', finding that no significant adverse effects are anticipated at any phase of the Scheme. The Applicant notes that the approach to recreation and access to the countryside has been agreed with Wiltshire Council's Public Health team and is under discussion with Wiltshire Council's Countryside Access Team. This is set out in the Statement of Common Ground with Wiltshire Council to be submitted at Deadline 1. <u>Visual</u> An assessment of landscape and visual effects are presented in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**. The Landscape and Visual Impact Assessment (LVIA) assesses effects on identified landscape and visual receptors, including residential properties, users of public

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			fragments wildlife habitats, and permanently damages the environment and community life across the wider area. For these reasons, I strongly object to the proposal in its entirety.	rights of way and roads, and identifies where significant effects may occur. The LVIA found no significant long term visual effects to residential properties as a consequence of the Scheme. The visual effects of the Scheme are summarised in **ES Volume 3, Appendix 8-3-3 [APP-192]**. Temporary Major/Moderate and Moderate Adverse effects on visual receptors have been recorded across the Scheme during construction and at Year 1. However, for the majority of these receptors, the effects reduce to non –significant levels as a result of the embedded mitigation measures which are set out in Section 8.9 of **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]** and include landscape buffers, retention of existing hedgerows and woodland, and new planting to provide screening and integration over time. The assessment also identifies that there would be some long-term significant effects on the visual amenity of users of some localised footpaths, as a result of the Scheme. This predominantly relates to locations where footpaths diagonally cross fields and mitigation planting would be inappropriate to landscape character and the legacy landscape. Those receptors which would experience Significant Long Term Visual Effects are listed in Table 8-30 of the **LVIA [APP-060].** The scale of development within the Order Limits has been significantly reduced from the layout assessed in the Preliminary Environmental Information Report (PEIR) through an iterative design process undertaken in response to consultation and in accordance with the mitigation hierarchy to avoid, reduce and mitigate adverse effects. As part of this design evolution, panels along the edge of

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				the Cotswolds National Landscape and along the Fosse Way have been removed. Mitigation measures to address landscape and visual effects are set out in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**, **Figure 3-4-1 to 3-4-5.2 Landscape and Ecology Mitigation Plan [APP-084]** and secured within the **Outline Landscape and Ecological Mitigation Plan (LEMP) [APP-283]** and the **Outline Ecological Protection and Mitigation Strategy (EPMS) [APP-284]**. These documents include proposals for new and enhanced planting, retention of existing hedgerows and woodland, and landscape integration measures to reduce visual effects over time. In addition, the Scheme design incorporates minimum offsets from existing landscape features, including residential properties, ancient woodland, woodland, hedgerows, public rights of way and watercourses, to further limit visual impacts. Although these measures reduce the effects of the Scheme on nearly all receptors, as noted above there are 10 receptors which would experience Significant Visual Effects for the duration of the Scheme as set out Table 8-30 of the **LVIA [APP-060]**. Mitigation measures to address landscape and visual effects are set out in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**, **Figure 3-4-1 to 3-4-5.2 Landscape and Ecology Mitigation Plan [APP-084]**. The preparation, approval and implementation of detailed landscape and ecological management plans, substantially in accordance with the **OLEMP [APP-283]** and **EPMS [APP-284]**, are secured through requirements in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that the identified mitigation measures are delivered and maintained throughout the lifetime of the Scheme. <u>Noise</u>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				An assessment of the effects of the Scheme on noise and vibration is provided in **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**, with supporting technical information supplied in **ES Volume 3, Appendix 14-4: Noise Modelling [APP-237]**. The assessment considers potential noise and vibration impacts during construction, operation and decommissioning, including from solar PV panels and associated infrastructure. The Applicant notes that the approach to noise and vibration has been discussed with Wiltshire Council, as described in Section 14.2 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**. <u>Construction phase</u> The noise and vibration impacts arising from construction activities are assessed in Section 14.10 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**. For the purposes of the assessment, a reasonable worst-case scenario assuming piling activities has been considered. Mitigation measures associated with construction activity are presented in Section 14.9 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]** and are committed to through the **Outline Construction Environmental Management Plan (OCEMP) [APP-277]**. With these measures in place, the assessment concludes that no significant effects from construction noise or vibration are expected. A noise monitoring programme agreed with Wiltshire Council will be carried out during construction. The preparation, approval and implementation of the Construction Environmental Management Plan, substantially in accordance with the **OCEMP [APP-277]**, is secured through Requirement 13 in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that construction noise and vibration are appropriately controlled.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				Operational phase The noise impacts from the operation of the Scheme and its components are assessed in Section 14.10 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**, with supporting modelling provided in **ES Volume 3, Appendix 14-4: Noise Modelling [APP-237]**. A penalty has been applied to predicted noise levels from the Solar PV Sites to account for the distinctive nature of the sound. Potential mitigation measures are detailed in Section 14.9 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**, and with such measures in place, significant effects from operational noise are not expected. The **Outline Operational Environmental Management Plan (OOEMP) [APP-278]** commits to noise levels from the Scheme at residential dwellings being the same as or below those modelled in the ES. This provides assurance that significant effects from operational noise will be avoided, while allowing flexibility in how this is achieved. The preparation, approval and implementation of the detailed OEMP, substantially in accordance with the outline plan, are secured through Requirement 14 of Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring operational noise is appropriately controlled throughout the lifetime of the Scheme. Traffic The potential effects of construction traffic on the local highway network are assessed in **ES Volume 1, Chapter 13: Transport and Access [APP-065]**, which considers construction vehicle movements, traffic volumes, road safety and effects on road users. This included the capacity of local roads and infrastructure to accommodate construction vehicles

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				with consideration of construction traffic volumes, vehicle types, route suitability, and network performance. The assessment concludes that the level of construction traffic associated with the Scheme is unlikely to materially affect road safety on links within the Study Area, and no significant adverse effects on accident risk are anticipated. The assessment additionally concludes that with appropriate mitigation such as the Construction Traffic Management Plan in place to manage construction vehicle movements, there would be no significant adverse impacts on the local highway network during the construction, operation maintenance, and decommissioning phases of the Scheme. An **Outline Construction Traffic Management Plan (OCTMP) [APP-287**] has been prepared and submitted with the DCO application. The aim of the **OCTMP [APP-287]** is to ensure that the effect of the construction phase on the local highway network is minimised. The **OCTMP [APP-287]** sets out measures to coordinate construction deliveries by HGVs to arrive and depart between 09:30 and 16:30 where possible, to avoid peak network hours of 08:00–09:00 and 17:00–18:00. It also includes a community liaison element to keep local communities informed about the construction process and to provide a contact for feedback should any issues arise. Compliance with the CTMP will be monitored by the Developer, Contractor and Wiltshire Council as local highway authority. The preparation, approval and implementation of the final CTMP, substantially in accordance with the **OCTMP [APP-287]**, are secured through Requirement 15 of Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring construction traffic impacts are appropriately managed throughout the construction phase of the Scheme. Wildlife and habitats

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				Potential impacts on ecology and biodiversity are fully assessed in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**. This assessment considers baseline ecological conditions and evaluates likely significant effects arising during the construction, operation and decommissioning phases of the Scheme. It identifies avoidance, mitigation and enhancement measures to address potential impacts on habitats and protected and notable species. It also identifies opportunities for ecological enhancement, including the creation and long-term management of habitats, and delivery of biodiversity net gain. The assessment concludes that, with the identified embedded and additional mitigation measures in place, no unacceptable significant adverse effects on ecology and biodiversity are anticipated. The Applicant notes that the approach to the assessment in relation to ecology and biodiversity in general is under discussion with Wiltshire Council and Natural England and is set out in the relevant Statements of Common Ground to be submitted at Deadline 1. During construction, specific measures are proposed to avoid disturbance and displacement of wildlife. These include protective buffers around sensitive habitats and features, timing restrictions on vegetation clearance, pre-construction ecological surveys, species-specific mitigation, and pollution prevention controls which are set out in the **Outline Ecological Protection and Mitigation Strategy (OEPMS) [APP-284]**. Measures to protect trees and hedgerows are also set out in **ES Volume 1, Chapter 10: Arboriculture [APP-062]**. The Scheme will also result in the cessation of intensive arable farming within the Solar PV Sites. As identified in **ES Volume 1, Chapter 9 [APP-061]**, this is expected to reduce the ongoing application of herbicides and pesticides,

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				supporting improvements in habitat quality over the operational lifetime of the Scheme. The reversion of existing arable land within the Solar PV Sites to predominantly grassland habitats can be expected to benefit a wide range protected and notable species, as identified in **ES Volume 1, Chapter 9 [APP-061]**. Mitigation and enhancement measures are detailed in the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]** and the **OEPMS [APP-284]**, which set out habitat creation, species protection measures, buffer zones and long-term ecological management. The preparation, approval and implementation of the detailed Landscape and Ecological Management Plan, substantially in accordance with the **OLEMP [APP-283]**, are secured through Requirement 7 in Schedule 2 of the **Draft Development Consent Order [APP-016]**. The preparation, approval and implementation of the detailed Ecological Protection and Mitigation Strategy, substantially in accordance with the **OEPMS [APP-284]**, are secured through Requirement 8 in Schedule 2 of the **Draft Development Consent Order [APP-016]**. These requirements ensure that ecological protection and enhancement measures are delivered and maintained throughout construction and operation of the Scheme.

4.35 Cotswolds Edge Riding Club

Table 4-35 RR-0943

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
CERC-001	Socio-Economics, Tourism and Recreation	PRoWs	I object - As a riding club and supporting many riders to fresh air and exercise if Lime kiln is built this will decimate our routes and cut the amount of grazing and crop growing needed to sustain our passion. please reconsider	The Applicant confirms that impacts to PROWs, unsurfaced roads, and the recreational use of the highway network have been assessed in **ES Volume 1 Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** and the supporting **ES Volume 3 Appendix 16-2 Tourism and Recreation Receptor Tables [APP-241].** Consideration of the likely impact on views, character and the desirability of these routes to users has been fundamental to the assessment of likely significant effects. The Applicant confirms that the majority of significant adverse effects can be mitigated, however understands that some significant adverse effects to users of routes in Lime Down E cannot be mitigated further during construction. Otherwise, no significant adverse effects to horse riders is anticipated at any phase of the Scheme.

4.36 Jackdaws Coffee House

Table 4-36 RR-1975

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
JDH-001	Description and DCO Process	Planning Constraints and Grid Connection	The proposal does not provide adequate detail on planning constraints, grid connection arrangements, or the potential impact on the local area. These omissions make it difficult to properly assess the project's feasibility and raise concerns about its deliverability at this stage.	The Applicant is confident that the management and mitigation measures proposed are comprehensive and robust and that the Scheme aligns with national and local planning policy; this is outlined in the **Planning Statement [APP-267].** Sections 3.3 and 3.4 of the Planning Statement **[APP-267]** set out the planning constraints within and surrounding the Order Limits of the Scheme. These constraints have been considered as appropriate in the assessments set out within the Environmental Statement. In addition, Section 8 of the Planning Statement **[APP-267]** provides an appraisal of the Scheme's compliance with planning policy. Annex A and Annex B of the Planning Statement **[APP-267]** provide further detail relating to policy accordance in relation to national and local planning policies. Grid connection arrangements have been assessed throughout the **ES [APP-052 to APP-265]**, which considers the likely significant construction effects associated with these works. The Applicant confirms that the existing National Grid Melksham substation has been identified as the point of connection. This decision was based on available capacity, network resilience, and strategic grid planning. As explained in **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]**, an initial search area was identified at a 5 km radius from the POC, however this was later expanded as no suitable and available sites within 5 km were identified. The search area was enlarged incrementally to a 20 km radius which is considered by the Applicant to be a viable cable connection distance for a solar project of this scale. The POC and 20 km search area is shown on Figure 1, Annex C of **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]**. Further, from an operational perspective, high voltage electricity transmission at 400kV in this case, is specifically

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				designed to minimise energy losses over long distances. As such, the approximate 20km distance involved results in negligible losses. More details on how the Cable Route Corridor has been located and designed can be found in **ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP-056]**. Several factors were considered designed to take a direct route whilst following existing features, such as roads, and avoiding sensitive receptors as far as practicable, such as habitat designations, residential and commercial properties, heritage assets, and a large number of land interests. Of particular relevance to the assessment of effects on local communities are **ES Volume 1, Chapter 8: Landscape and Visual [APP-060], Chapter 13: Transport and Access [APP-065], Chapter 14: Noise and Vibration [APP-066], Chapter 15: Air Quality [APP-067], Chapter 16: Socioeconomics, Tourism and Recreation [APP-068], and Chapter 18: Human Health [APP-070],** all of which consider potential impacts on residential properties and local communities. The **Grid Connection Statement [APP-270]** details the status of the grid connection offer and provides confirmation that the grid connection forms part of the Scheme and, as such, constitutes a single application to the Secretary of State.

4.37 The Chimney Sweeper Ltd

Table 4-37 RR-4649

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
TCW-001	Consultation and Engagement	Consideration of Feedback	I have made a separate personal submission. However I would like to add from the perspective of my local chimney sweeping company. Travelling from property to property and speaking to local residents it is very apparent that there is a high level of dismay amongst local residents. I would also report there is a big feeling of helplessness and I suspect many, especially older residents, will not engage with this process and many feel it is futile as the inspectorates recommendations can be ignored by government anyway.	Impacts on mental health and wellbeing are assessed in **ES Volume 1, Chapter 18: Human Health [APP-070]**. This chapter provides a comprehensive assessment of the Scheme's potential effects on human health, including mental health and wellbeing, through consideration of a broad range of health determinants. These include access to open space and recreation, transport and connectivity, community identity and cohesion, employment and income, noise and vibration, air quality, and access to health and social care services. The assessment applies a health "lens" to the findings of relevant technical chapters and concludes that, with embedded mitigation and additional measures secured, the Scheme would not give rise to significant adverse effects on population health, including mental health and wellbeing. The assessment focuses on communities within a 2 km Study Area surrounding the Scheme, identified as those most likely to experience potential health-related effects. Baseline analysis demonstrates that rates of poor mental health within the Study Area are generally lower than national averages, and the assessment considers potential pathways by which the Scheme could influence mental wellbeing, including changes to environment, amenity, access and community factors. Residual effects of the Scheme on health following mitigation are assessed as not significant at any phase of the Scheme. Consultation with Wiltshire Council's Public Health Team has informed the approach to mental health considerations, as documented in **ES Volume 3, Appendix 18-1: Human Health Consultation [APP-244].** Through this engagement, the Applicant has committed to signposting locally available mental health and wellbeing resources to members of the public engaging with the Scheme, using information provided by Wiltshire Council's Public Health Team. The Applicant will continue to monitor consultation responses relating to mental health and will provide appropriate signposting to existing local support services where requested. The Applicant notes that the assessment methodology for health and wellbeing has been

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				agreed with Wiltshire Council's Public Health team and is set out in the relevant Statement of Common Ground to be submitted at Deadline 1. The Applicant considers that the statutory consultation has been robust, thorough and undertaken in accordance with the requirements of the Planning Act 2008, the Environmental Impact Assessment Regulations, and the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009. The **Consultation Report [APP-022]** sets out the Applicant's approach to pre-application consultation and demonstrates how consultation was undertaken with a wide range of stakeholders, including local communities, community organisations, statutory consultees and those with an interest in land. Throughout the pre-application period, the Applicant adopted a multi-channel and accessible consultation approach designed to ensure that consultation opportunities were available to all members of the community, including those who may have limited access to digital engagement methods, such as older residents. The consultation strategy therefore included both online and in-person engagement opportunities, alongside a range of offline materials and communication channels. This included multiple in-person community information events. The Applicant also ensured that consultation materials were available in both digital and hard copy formats. The Applicant provided free-to-use communication channels including a Freephone telephone number, Freepost address and dedicated project email address. The Applicant has sought to engage with communities ahead of construction through the implementation of a Community Liaison Group, as secured through Requirement 4 in Schedule 2 to the **Draft DCO [APP-016]**. Whilst this group is set up for the construction phase of the Scheme, the Applicant has committed to providing a designated community contact within

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				the Scheme's operation and maintenance team during the operational lifetime of the Scheme, with a dedicated Community Liaison Manager committed to during peak replacement events and decommissioning. This is secured through the **Outline OEMP [APP-279]** and **Outline DS [APP-279]** by Requirements 14 and 20 in Schedule 2 to the **Draft DCO [APP-016]**.
TCW-002	Hydrology, Flood risk and Drainage	Flooding	There are real fears of flooding and dismay at the destruction of the countryside.	An assessment of the effects of the Scheme on flood risk both within the Site and the surrounding area is provided in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [APP-063]**, with supporting information provided in **ES Volume 3, Appendix 11-1 to 11-9: Flood Risk Assessment and Drainage Strategy [APP-210 to APP-218].** The assessment concludes that, with the embedded mitigation measures secured, the Scheme would not result in a material increase in off-site flood risk, including to adjacent communities and downstream receptors, and that any on-site flood risk would be managed such that the Scheme remains safe and operable for its lifetime. The assessment has been prepared in accordance with national policy and best practice guidance and in consultation with the Environment Agency and Lead Local Flood Authority and is set out in the relevant Statement of Common Ground to be submitted Deadline 1. The **Outline Construction Environmental Management Plan (CEMP) [APP-277]** has been developed to control construction-phase risks and ensure there is no material increase in off-site flood risk. In accordance with NPS EN-3 (paragraph 2.10.84), the assessment differentiates between solar PV panel areas, which drain to the existing ground and therefore do not generally give rise to significant drainage effects, and associated infrastructure (for example access tracks, temporary construction compounds, substations and the

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				BESS) where runoff controls are required. Where drainage measures are necessary, these include permeable surfacing, infiltration features, swales and attenuation storage to manage surface water and maintain greenfield runoff behaviour, as applicable. **Requirement 13 in Schedule 2 to the Draft DCO [APP-016]** secures that part of the authorised development can commence until, a CEMP is submitted to and approved by the relevant planning authority. The approved CEMP must be substantially in accordance with the **Outline Construction Environmental Management Plan [APP-277],** and construction works must be carried out in accordance with the approved document. This includes implementation of the construction phase drainage management measures and surface water controls identified in the **Flood Risk Assessment and Drainage Strategy [APP-210 to APP-218],** ensuring that flood risk and runoff from construction activities are appropriately managed. The preparation, approval and implementation of the detailed drainage and construction management plans, substantially in accordance with the outline plans, are secured through Schedule 2 of the **Draft Development Consent Order [APP-016]**. This secures delivery and maintenance of the drainage strategy for scheme infrastructure, together with soil and water management controls during construction, ensuring there is no material increase in off-site flood risk over the lifetime of the Scheme.
TCW-003	Transport and Access	Traffic Impact	The construction phase will undoubtedly impact negatively on our business as the road network is going to be restricted with roadworks, diversions and heavy	The potential effects of construction traffic on the local highway network are assessed in **ES Volume 1, Chapter 13: Transport and Access [APP-065]**, which considers construction vehicle movements, traffic volumes, road safety and effects on road users. This included the capacity of local roads and infrastructure to accommodate construction vehicles

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			traffic.there are limited alternative routes in this area.	with consideration of construction traffic volumes, vehicle types, route suitability, and network performance. The assessment concludes that the level of construction traffic associated with the Scheme is unlikely to materially affect road safety on links within the Study Area, and no significant adverse effects on accident risk are anticipated. The assessment concludes that with appropriate mitigation in place, there would be no significant adverse impacts on the local highway network during the construction, operation and maintenance, and decommissioning phases of the Scheme. An **Outline Construction Traffic Management Plan (OCTMP) [APP-287]** supports the DCO Application and presents outline measures which restrict construction deliveries to the proposed construction routes and separates the public and recreational users from hazards, including, traffic management measures such as signage and banksmen, fencing, and dust and noise control,

4.38 Martin Fausing Smith

Table 4-38 RR-3033

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
MFS-001	Description and DCO Process	Introduction	I'm the Wiltshire Councillor for the Sherston Division. Much of this project is within the area I represent. I wish to register my objection to the proposed Lime Down Solar Farm development.	The Applicant notes the objection raised. The Applicant is confident that the proposed management and mitigation measures set out in the **ES [APP-052 to APP-265]** are comprehensive and robust and that the Scheme aligns with national and local planning policy; this is outlined in the **Planning Statement [APP-267]**. Of particular relevance are Annex A: National Policy Statement Accordance Tables and Annex B: Local Policy Accordance Tables, of the Planning Statement which set out an appraisal of the Scheme against the policies.
MFS-002	Socio-Economics, Tourism and Recreation Transport and Access	PRoWs and Access to the Countryside	Many residents enjoy the open spaces and use the roads that will be impacted by this project.	A detailed assessment of the likely significance of effects from the Scheme on the use and desirability of individual PRoWs and recreational access to the countryside is included in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** and **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]**. This assessment considers the impact on individual recreational routes, including their practical use, enjoyment and desirability. The assessment finds no significant residual effects to individual PROWs or the PROW network overall. However, residual significant effects are anticipated to some long-distance recreation routes during all phases of the Scheme due to their regional or national importance. The assessment in **ES Volume 1, Chapter 18: Human Health [APP-070]** goes on to assess the physical and mental health impacts of changes to recreation and countryside access under the assessment topic 'open space, leisure and play', finding that no significant adverse effects are anticipated at any phase of the Scheme. The Applicant notes that the approach to recreation and access to the countryside has been agreed with Wiltshire Council's Public Health team and is under discussion with Wiltshire Council's Countryside Access Team. This is set out in

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				the Statement of Common Ground with Wiltshire Council to be submitted at Deadline 1. The potential effects of construction traffic on the local highway network are assessed in **ES Volume 1, Chapter 13: Transport and Access [APP-065]**, which considers construction vehicle movements, traffic volumes, road safety and effects on road users. This included the capacity of local roads and infrastructure to accommodate construction vehicles with consideration of construction traffic volumes, vehicle types, route suitability, and network performance. The assessment concludes that the level of construction traffic associated with the Scheme is unlikely to materially affect road safety on links within the Study Area, and no significant adverse effects on accident risk are anticipated. The assessment additionally concludes that with appropriate mitigation such as the Construction Traffic Management Plan in place to manage construction vehicle movements, there would be no significant adverse impacts on the local highway network during the construction, operation maintenance, and decommissioning phases of the Scheme. An **Outline Construction Traffic Management Plan (CTMP) [APP-287]** has been prepared and submitted with the DCO application. The aim of the CTMP is to ensure that the effect of the construction phase on the local highway network is minimised. The **Outline CTMP [APP-287]** sets out measures to coordinate construction deliveries by HGVs to arrive and depart between 09:30 and 16:30 where possible, to avoid peak network hours of 08:00–09:00 and 17:00–18:00. It also includes a community liaison element to keep local communities informed about the construction process and to provide a contact for feedback should any issues arise. Compliance with the CTMP will be monitored by the Developer, Contractor and Wiltshire Council as local highway authority.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				The preparation, approval and implementation of the final CTMP, substantially in accordance with the outline CTMP, are secured through Requirement 15 of Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring construction traffic impacts are appropriately managed throughout the construction phase of the Scheme.
MFS-003	Landscape and Visual Human Health	Impact on Landscape and Local Wellbeing	I wish to state that I do not believe this this development is appropriate, and in fact will be severely detrimental to the landscape and to the wellbeing of surrounding communities.	An assessment of landscape and visual effects are presented in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**. The Landscape and Visual Impact Assessment (LVIA) assesses effects on identified landscape and visual receptors, including residential properties, users of public rights of way and roads, and identifies where significant effects may occur. The LVIA found no significant long term visual effects to residential properties as a consequence of the Scheme. The visual effects of the Scheme are summarised in **ES Volume 3, Appendix 8-3-3 [APP-192]**. Temporary Major/Moderate and Moderate Adverse effects on visual receptors have been recorded across the Scheme during construction and at Year 1. However, for the majority of these receptors, the effects reduce to non –significant levels as a result of the embedded mitigation measures which are set out in Section 8.9 of **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]** and include landscape buffers, retention of existing hedgerows and woodland, and new planting to provide screening and integration over time. The assessment also identifies that there would be some long-term significant effects on the visual amenity of users of some localised footpaths, as a result of the Scheme. This predominantly relates to locations where footpaths diagonally cross fields and mitigation planting would be inappropriate to landscape character and the legacy landscape.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				Those receptors which would experience Significant Long Term Visual Effects are listed in Table 8-30 of the **LVIA [APP-060].** The scale of development within the Order Limits has been significantly reduced from the layout assessed in the Preliminary Environmental Information Report (PEIR) through an iterative design process undertaken in response to consultation and in accordance with the mitigation hierarchy to avoid, reduce and mitigate adverse effects. As part of this design evolution, panels along the edge of the Cotswolds National Landscape and along the Fosse Way have been removed. Mitigation measures to address landscape and visual effects are set out in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**, **Figure 3-4-1 to 3-4-5.2 Landscape and Ecology Mitigation Plan [APP-084]** and secured within the **Outline Landscape and Ecological Mitigation Plan (LEMP) [APP-283]** and the **Outline Ecological Protection and Mitigation Strategy (EPMS) [APP-284]**. These documents include proposals for new and enhanced planting, retention of existing hedgerows and woodland, and landscape integration measures to reduce visual effects over time. In addition, the Scheme design incorporates minimum offsets from existing landscape features, including residential properties, ancient woodland, woodland, hedgerows, public rights of way and watercourses, to further limit visual impacts. Although these measures reduce the effects of the Scheme on nearly all receptors, as noted above there are 10 receptors which would experience Significant Visual Effects for the duration of the Scheme as set out Table 8-30 of the **LVIA [APP-060]**. Mitigation measures to address landscape and visual effects are set out in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**, **Figure 3-4-1 to 3-4-5.2 Landscape and Ecology Mitigation Plan [APP-084]**.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				The preparation, approval and implementation of detailed landscape and ecological management plans, substantially in accordance with the **OLEMP [APP-283]** and **EPMS [APP-284]**, are secured through requirements in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that the identified mitigation measures are delivered and maintained throughout the lifetime of the Scheme. Impacts on mental health and wellbeing are assessed in **ES Volume 1, Chapter 18: Human Health [APP-070]**. This chapter provides a comprehensive assessment of the Scheme's potential effects on human health, including mental health and wellbeing, through consideration of a broad range of health determinants. These include access to open space and recreation, transport and connectivity, community identity and cohesion, employment and income, noise and vibration, air quality, and access to health and social care services. The assessment applies a health "*lens*" to the findings of relevant technical chapters and concludes that, with embedded mitigation and additional measures secured, the Scheme would not give rise to significant adverse effects on population health, including mental health and wellbeing. The assessment focuses on communities within a 2 km Study Area surrounding the Scheme, identified as those most likely to experience potential health-related effects. Baseline analysis demonstrates that rates of poor mental health within the Study Area are generally lower than national averages, and the assessment considers potential pathways by which the Scheme could influence mental wellbeing, including changes to environment, amenity, access and community factors. Residual effects following mitigation are assessed as not significant at any phase of the Scheme. Consultation with Wiltshire Council's Public Health Team has informed the approach to mental health considerations, as documented in **ES Volume 3, Appendix 18-1: Human Health Consultation [APP-244]**. Through this engagement, the

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				Applicant has committed to signposting locally available mental health and wellbeing resources to members of the public engaging with the Scheme, using information provided by Wiltshire Council's Public Health Team. The Applicant will continue to monitor consultation responses relating to mental health and will provide appropriate signposting to existing local support services where requested. The Applicant notes that the assessment methodology for health and wellbeing has been agreed with Wiltshire Council's Public Health team and is set out in the Statement of Common Ground with Wiltshire Council to be submitted at Deadline 1.
MFS-004	Description and DCO Process	Scheme Location and Ownership	Whilst I support community renewable energy projects that benefit our local community, this project does not. It is the wrong project, in the wrong place, and under the wrong ownership.	The Applicant acknowledges that any adverse effects from the Scheme are more likely to be felt locally than the largely wider-scale benefits of the Scheme. The Scheme is anticipated to help meet the UK's net zero requirements for energy production, which is considered a critical national priority and set out in National Policy Statements for Energy NPS EN-1 (section 4.2) and EN-3. This therefore will benefit the national population rather than just the local population. The Scheme is also anticipated to benefit the population within approximately 20km of the Scheme, through providing employment and income especially during construction and peak replacement activities (as assessed in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]**), and providing skills and training opportunities (as secured through the **OSSCEP [APP-285]** through Requirement 18 of Schedule 2 to the **Draft DCO [APP-016]**). Where the Scheme is anticipated to benefit local people more specifically, this is done through providing onsite permissive paths to increase access to the countryside, providing improved landscape planting through reinforcing existing hedgerows and planting of new trees, providing biodiversity net gains through habitat improvements. This is secured through the **OLEMP [APP-283]** and **OPROWPPMP [APP-282]** through

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				Requirements 7 and 16 of Schedule 2 to the **Draft DCO [APP-016]**. That notwithstanding, the Applicant is committed to providing a Community Benefit Fund to allow for community-driven benefits that are not necessarily associated with the Scheme itself. The purpose is to establish a means to recognise local community needs that the Applicant wants to be able to contribute towards in recognition of the local impact of the Scheme. National Policy Statement EN-3 Paras 2.10.11 and 2.10.18 explain that the availability of grid connection, suitable irradiance levels, and local topography are key inputs to the selection of sites suitable for large-scale solar generation developments. The number of locations within the UK at which large-scale solar generation is suitable is therefore likely to be limited, and this is a material issue when considering how the UK is to meet the urgent need for low carbon generation as is set out in the NPSs. This point is expanded upon in the **Statement of Need [APP-266]** in particular in Section 4.3. Chapter 8 of the **Statement of Need [APP-266]** provides evidence to support the suitability of the proposed location of the Scheme for large-scale solar plus storage in relation to the timeliness and availability of the grid connection, transmission system operability and the decarbonisation and energy security benefits the Scheme will bring forward from this location. As set out in **ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP-056]** and the Site Selection Assessment Report at **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]** an appraisal of alternative sites within a 20km radius of the Existing National Grid Melksham Substation has been undertaken, which concludes that there are no more suitable locations within the 20km search area than the proposed location for the Scheme.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				Regarding the Scheme ownership, the Applicant has demonstrated compliance with all statutory requirements under the Planning Act 2008 and applicable legislation such as The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017. The Applicant is subject to legally binding DCO requirements. The Planning Act 2008 also contains enforcement provisions regarding compliance with the terms of a DCO The DCO process itself incorporates enforceable mechanisms to regulate Scheme delivery. Any breach of development consent order or failure to comply with Requirements can result in enforcement action. The Applicant, Lime Down Solar Park Limited is a 100% subsidiary of IGP UK Projects Limited. Both are registered in England and Wales and subject to UK tax law and regulations. Investment may come from a range of sources, including international ones. This is common practice with UK infrastructure Schemes and helps fund the transition to clean energy at the scale required. The **Funding Statement [APP-019]** submitted with the DCO application demonstrates that the Scheme is financially viable and adequately funded to deliver the Scheme in full.
MFS-005	Site Selection and Alternatives	Panel Height	Scale and Landscape Impact. The solar panels will be much bigger and higher than any project we have seen in the UK.	The Scheme has been designed to deliver the greatest possible benefit from the available land and the available grid connection, whilst avoiding, minimising and/or mitigating harmful environmental effects. The assessments set out in the various chapters of the **ES [APP-052 to APP-265]** detail what impacts are expected as a result of the Scheme based on the minimum and maximum parameters of the Scheme, and the mitigation and enhancement measures that are proposed to reduce these impacts.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				Landscape and Visual Effects The height of the solar PV panels has been assessed using clearly defined design parameters, including a maximum height of 4.5 metres above ground level at maximum tilt, as set out in **ES Volume 1, Chapter 3: The Scheme [APP-055]**. These parameters represent a realistic worst-case scenario for the purposes of the Environmental Impact Assessment. The landscape and visual effects of the Scheme, including the effects of the maximum panel height, are assessed in the Landscape and Visual Impact Assessment (LVIA) presented in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**. The LVIA assesses effects on identified landscape and visual receptors during construction, operation and decommissioning, using the maximum design parameters to ensure a robust assessment. Mitigation measures to address landscape and visual effects, including measures that reduce the perceived height and prominence of panels in views, are set out in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**, Figure 3-4-1 to 3-4-5.2 **Landscape and Ecology Mitigation Plan [APP-084]** and detailed within the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]**. These include new and enhanced planting, retention of existing hedgerows and woodland, and landscape integration measures to reduce visual effects over time. The preparation, approval and implementation of the detailed Landscape and Ecological Management Plan, substantially in accordance with the **OLEMP [APP-283]**, are secured through Requirement 7 in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that the identified mitigation measures are delivered and maintained throughout the lifetime of the Scheme.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
MFS-006	Landscape and Visual Socio-Economics, Tourism and Recreation	PRoWs and Fencing	Our footpaths will be hemmed in by high wire fences.	Fencing is not proposed within 15 m of the centreline of existing PRoW. The buffer space between PROWs and fences, would be planted with either hedgerows or low-level ground cover planting to encourage either visual screening, or improve biodiversity. These are shown on **ES Volume 2, Figures 3-4-1 to 3-4-5.2 [APP-084]** and secured through the **OLEMP [APP-283]** by Requirement 7 in Schedule 2 to the **Draft DCO [APP-016]**. Where PROWs run alongside existing or proposed hedgerows, these will only be to one side of the PROW to maintain open aspect and passing space on the opposite side. Only PROWs or unsurfaced roads that are hedge lined on both sides will be maintained as such. The majority of site fencing is to consist of 2 m deer stock fencing. This is to control large mammalian movements and provide a visual deterrent to entering the Solar PV Sites. Metal palisade fencing is only proposed in locations where there is a danger to life, and so is limited to substation and BESS enclosures. Palisade fencing is not proposed adjacent to PROWs. Where PROWs run adjacent to substations, these are separated by existing hedgerows, which will be strengthened, and palisade security fencing will only be located on side of the hedgerow facing the substation infrastructure.
MFS-007	Landscape and Visual	Visual Impact and Mitigation	The open, rolling landscape will be covered by a sea of black panels. Mitigating the visual impact will be impossible.	The Applicant notes that visual impacts are addressed in detail in the response above and does not repeat that information here to avoid duplication. The LVIA assesses the effectiveness of these mitigation measures over time and concludes that, in many locations, landscape and visual effects would reduce as mitigation planting establishes and matures. NPS EN-1 recognises at para 5.10.5 that "*Virtually all nationally significant energy infrastructure projects will have adverse effects on the landscape, but there may also be beneficial landscape*

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				character impacts arising from mitigation." Details of the mitigation measures and their long-term management are set out in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**, Figure 3-4-1 to 3-4-5.2 **Landscape and Ecology Mitigation Plan [APP-084]** and the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]**.
MFS-008	Noise and Vibration	Noise Pollution	There is also the constant noise pollution that will be generated by a large number of moving panels. substations and battery storage in what is a tranquil environment.	An assessment of the effects of the Scheme on noise and vibration is provided in **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**, with supporting technical information supplied in **ES Volume 3, Appendix 14-4: Noise Modelling [APP-237]**. The assessment considers potential noise and vibration impacts during construction, operation and decommissioning, including from solar PV panels and associated infrastructure. The Applicant notes that the approach to noise and vibration has been discussed with Wiltshire Council, as described in Section 14.2 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**. Construction phase The noise and vibration impacts arising from construction activities are assessed in Section 14.10 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**. For the purposes of the assessment, a reasonable worst-case scenario assuming piling activities has been considered. Mitigation measures associated with construction activity are presented in Section 14.9 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]** and are committed to through the **Outline Construction Environmental Management Plan [APP-277]**. With these measures in place, the assessment concludes that no significant effects from construction noise or vibration are expected. A noise monitoring programme agreed with Wiltshire

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				Council will be carried out during construction. The preparation, approval and implementation of the Construction Environmental Management Plan, substantially in accordance with the **Outline CEMP [APP-277]**, is secured through Requirement 13 in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that construction noise and vibration are appropriately controlled. Operational phase The noise impacts from the operation of the Scheme and its components are assessed in Section 14.10 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**, with supporting modelling provided in **ES Volume 3, Appendix 14-4: Noise Modelling [APP-237]**. A penalty has been applied to predicted noise levels from the Solar PV Sites to account for the distinctive nature of the sound. Potential mitigation measures are detailed in Section 14.9 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**, and with such measures in place, significant effects from operational noise are not expected. The **Outline Operational Environmental Management Plan [APP-278]** commits to noise levels from the Scheme at residential dwellings being the same as or below those modelled in the ES. This provides assurance that significant effects from operational noise will be avoided, while allowing flexibility in how this is achieved. The preparation, approval and implementation of the detailed OEMP, substantially in accordance with the outline plan, are secured through Requirement 14 of Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring operational noise is appropriately controlled throughout the lifetime of the Scheme.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
MFS-009	Landscape and Visual		The substations and battery storage system will be industrial in scale and totally out of keeping with a landscape that border the Cotswolds National Landscape. The proposed development would have a major and lasting impact on the open spaces and visual amenity afforded to local residents.	The Cotswolds National Landscape (CNL) is fully assessed as a standalone receptor within **ES Volume 3, Appendix 8.6: Assessment of Effects on the Special Qualities of the Cotswolds National Landscape [APP-197]**. This assessment considers the effects of the Scheme on landscape character, visual amenity and the special qualities of the CNL, including tranquillity. The assessment found that there would be some short term impact to landscape character within the setting of the CNL but due to the avoidance measures embedded within the Scheme, harm to the CNL itself would be minimal with beneficial effects in the long term which would further the purposes of the designation. In respect of visual amenity, some short-term adverse effects would be experienced by a small number of visual receptors with views to and from the CNL. However, these would reduce over time as a result of the proposed mitigation. The assessment of effects on the special qualities of the CNL scoped out 3 SQs as there is no association with the Site. The assessment found that there are no direct effects on the remaining SQs. There are some Minor/ Negligible short-term effects on a small number of visual receptors within the setting of the CNL which effect SQ7 -Tranquillity and SQ13 Archaeology and historic associations. However, these effects are mitigated by Year 15 when proposed vegetation has matured. The assessment also found that there would be beneficial effects on SQ 6 – Biodiversity and nature recovery as a result of the delivery of approximately 119.7 hectares of flower-rich neutral grassland (as defined in the BNG assessment) and SQ 12 - An accessible landscape as a result of the delivery of approximately 12.8km of new permissive paths within the setting of the CNL. The remaining SQs would remain entirely intact. The Scheme was refined through an iterative design process to avoid and reduce effects on the CNL and its setting. Panels along the edge of the CNL were removed from the Order Limits

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				in fields C2, C3 and C4 where significant visual effects on receptors within the CNL were identified. Panels were also removed from fields C1, C6, C8, the western section of C9 and the majority of C10, with this land now proposed for ecological mitigation to protect the setting of the CNL. In addition, panels within fields A11 and A12 were removed and the land repurposed for ecological mitigation to protect the setting of the CNL towards Sherston. All land parcels adjacent to the CNL are proposed to deliver habitat enhancement, informed by the CNL Management Plan and the Cotswolds National Landscape Strategy and Guidelines, to further the purposes of the designation. Details of the proposed landscape and ecological mitigation and enhancement measures are provided in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**, Figure 3-4-1 to 3-4-5.2 **Landscape and Ecology Mitigation Plan [APP-084] and** the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]**, and the **Outline Ecological Protection and Mitigation Strategy (EPMS) [APP-284]**. The preparation, approval and implementation of the detailed Landscape and Ecological Management Plan, substantially in accordance with the **OLEMP [APP-283]**, are secured through Requirement 7 in Schedule 2 of the **Draft Development Consent Order [APP-016]**. The preparation, approval and implementation of the detailed Ecological Protection and Mitigation Strategy, substantially in accordance with the **EPMS [APP-284]**, are secured through Requirement 8 in Schedule 2 of the **Draft Development Consent Order [APP-016]**. These requirements ensure that the identified mitigation and enhancement measures are delivered and maintained throughout the lifetime of the Scheme. A detailed assessment of the likely significance of effects from the Scheme on the use and desirability of

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				individual PRoWs and recreational access to the countryside is included in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** and **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]**. This assessment considers the impact on individual recreational routes, including their practical use, enjoyment and desirability. The assessment in **ES Volume 1, Chapter 18: Human Health [APP-070]** goes on to assess the physical and mental health impacts of changes to recreation and countryside access under the assessment topic 'open space, leisure and play', finding that no significant adverse effects are anticipated at any phase of the Scheme. The Applicant notes that the approach to recreation and access to the countryside has been agreed with Wiltshire Council's Public Health team and is under discussion with Wiltshire Council's Countryside Access Team. This is set out in the Statement of Common Ground with Wiltshire Council to be submitted at Deadline 1.
MFS-010	Soils and Agriculture	Loss of Farmland	Loss of Productive Farmland. Approximately 30% of the farmland is 'best and most versatile' farmland. The removal of this high-quality farmland for decades at a time is not compatible with sustainable planning. With growing concerns over food supply and national resilience, we should not be trading productive soil for imported food while leaving roofs, brownfield sites, and degraded land underused for renewable generation – especially when national targets for solar energy can be met by prioritising	An assessment of the potential effects of the Scheme on soils and agricultural land is provided in **ES Volume 1, Chapter 17: Soils and Agriculture [APP-069]**. This chapter considers baseline agricultural land quality, including Best and Most Versatile (BMV) land, and assesses likely significant effects arising from construction, operation and decommissioning of the Scheme, together with embedded mitigation measures. The areas of each Agricultural Land Classification (ALC) grade affected by the Scheme are set out in ES Chapter 17, Section 17.7. Of the agricultural land within the Solar PV Sites, approximately 477.4 hectares (around 67%) is classified as Subgrade 3b or Grade 4 and is therefore not BMV land. There is no Grade 1 land, around 30.8 hectares (approximately 4%) of Grade 2 land, and approximately 209.3 hectares (around 29%)

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			those more suitable locations first, as stated by the Council for the Protection of Rural England.	of Subgrade 3a land. The distribution of ALC grades is shown in **ES Volume 2, Figure 17-2: Agricultural Land Classification Mapping [APP-172]**. The Applicant has had regard to agricultural land quality in the design and site selection process and has sought, where practicable, to locate infrastructure on lower quality land. The Scheme will result in a temporary but long-term and reversible loss of agricultural land for the operational life of the Scheme. As set out in ES Chapter 17, Section 17.10, this gives rise to a temporary, long-term moderate adverse effect on agricultural land overall, and a temporary, long-term major/moderate adverse effect on BMV land, both of which are assessed as significant. These effects are fully reported in the ES and are a matter for the Secretary of State to weigh in the planning balance against the need for the Scheme and its wider benefits. There are no significant permanent effects on agricultural land, as all land will be returned to its original use and condition as far as practicable following decommissioning. The Applicant notes that the approach to assessing the quality of the agricultural land is under further discussion with Natural England and is set out in the relevant Statement of Common Ground to be submitted at Deadline 1. Measures to avoid and minimise effects on soils and agricultural land are embedded within the Scheme design and secured through the DCO. These include the preparation and implementation of a **Soil Resources Management Plan (SRMP) [APP-280]**, which will control soil handling, storage and reinstatement during construction, operation and decommissioning, and a requirement to prepare and implement a Decommissioning Strategy in accordance with the **Outline Decommissioning Strategy [APP-279]**. Through the establishment and maintenance of long-term grassland beneath and between the solar arrays, soil health, quality and structure are anticipated to improve over the lifetime

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				of the Scheme, resulting in a temporary, moderate beneficial effect on soil resources at decommissioning, which is assessed as significant (ES Chapter 17, Sections 17.10 and 17.12). In relation to suggestions that brownfield land or alternative locations should be used, including rooftop, these matters are addressed in **ES Volume 1, Chapter 4: Alternatives and Design Evolution and in the Statement of Need [APP-056 and APP-266]**. The Applicant has considered alternatives, including previously developed land and other forms of solar deployment, as part of the site selection and design evolution process. As shown in Table 2-2 of **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]**, the Applicant has considered previously developed land/brownfield land over 1 hectare within the area of search, based on the brownfield land registers of the relevant Local Planning Authorities, and concluded that none of the sites are large enough to provide a viable land parcel of at least 40 ha and sites were not considered to be available as they have planning permission for residential development and/or are allocated for residential/mixed use development. National policy and government guidance, as set out in the **Statement of Need [APP-266]**, recognise that while rooftop and smaller-scale solar installations are an important part of the energy mix, they cannot alone meet the scale of capacity required to achieve clean power and net zero objectives. Large-scale ground-mounted solar therefore remains necessary in addition to, not instead of, rooftop solar. Governmentled agricultural initiatives, such as the Sustainable Farming Incentive which is relaunching later in 2026, have prioritised soil health, environmental enhancement and climate resilience, recognising that longterm food security is influenced by a range of factors beyond land take alone, including soil condition, climate change and environmental pressures. The Scheme allows soils to remain in situ and undisturbed during operation, supporting soil recovery and longterm land health,

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				with land reinstated and returned to agricultural use as far as practicable following decommissioning. No permanent loss of agricultural land is anticipated. The Applicant does not consider that food security will be compromised by the Scheme (or solar energy more widely). The latest figures to September 2024 indicate that solar occupied around 21,200 ha of agricultural land in the UK. In 2025, 545,000 ha of arable land in England were left uncropped (source: Department for Environment, Food & Rural Affairs, Agricultural land use in England at 1 June 2025). It should also be noted that food security is not identified as an issue within the suite of Energy National Policy Statements or the National Planning Policy Framework (NPPF). Further, the Government's UK Solar Roadmap (2025) states that solar development is not considered to compromise food security, but that the climate and nature crisis poses the greatest long-term risk to food security - a risk which the Scheme directly helps to address by providing a secure, low-carbon source of electricity. As set out in Section 2 of the **Outline Decommissioning Strategy [APP-279],** post-decommissioning of the Scheme, the landowners would choose how the land is to be used and managed. The landowner may return all of the land to arable use, although it is likely that established habitats such as hedgerows and woodland would be retained given their potential benefits to agricultural land and the wider farming estate.
MFS-011	Construction and Decommissioning	Construction and Disruption	Disruption Without Local Benefit. The construction and maintenance of such a large installation would bring years of disruption to nearby communities, including heavy vehicle movements on rural roads and lanes ill-suited to industrial traffic.	The capacity of local roads and infrastructure to accommodate construction vehicles is assessed in **ES Volume 1, Chapter 13: Transport and Access [APP-065]**, which considers construction traffic volumes, vehicle types, route suitability and network performance. The assessment concludes that, with appropriate mitigation in place, there would be no significant adverse impacts on the local highway network.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				Supporting technical information is provided in **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]**, which identifies specific locations where traffic management measures or passing arrangements may be required on narrower sections of construction routes. The assessment presented in Annex H of **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]** demonstrates adequate carriageway width or frequency of passing place opportunity to pass at least an HGV and a light vehicle as requested in comments provided by WC. All construction routes also include passing points to allow two HGVs to pass. Mitigation measures to manage construction traffic are set out in the **Outline Construction Traffic Management Plan (CTMP) [APP-287]**. The CTMP is designed to minimise the effects of construction traffic on local roads and includes measures for vehicle routing, delivery scheduling and liaison with the local highway authority. The preparation, approval and implementation of the final CTMP, substantially in accordance with the outline CTMP, are secured through Requirement 15 of Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring construction traffic impacts on local roads and infrastructure are appropriately managed throughout the construction phase of the Scheme.
MFS-012	Transport and Access	HGV Modelling	I believe the truck movements modelled in the proposals are seriously underestimated.	The Applicant has predicted construction traffic flows for the Scheme based on a realistic breakdown of construction materials, such as aggregate and number of modules. Calculations are provided in Annex E of **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]**. Further detail of trip generation will also be added to **ES Volume 3,**

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				Appendix 13-1: Transport Assessment [APP-233] and resubmitted at Deadline 1 of Examination.
MFS-013	Transport and Access	Highway Improvement Areas	The proposals include major changes to rural lanes and urban roundabouts to allow vehicles through that are so large they need an escort.	All changes to accommodate AIL vehicles are minor and included within the Order Limits as Highway Improvement Areas (HIA). Details of HIA are provided in the **OCTMP [APP-287]** and would include temporary works including minor carriageway widening, removal of street furniture, and vegetation clearance. AIL movements are one-off and the Applicant will follow the standard procedures which can include the requirement for escort.
MFS-014	Community Benefits	Benefits for Local Residents	Yet the proposal offers no tangible benefits for local residents – no reduction in energy bills, and no meaningful community investment. Local people are being asked to bear the costs without sharing in the gains.	The Applicant acknowledges that any adverse effects from the Scheme are more likely to be felt locally than the largely wider-scale benefits of the Scheme. The Scheme is anticipated to help meet the UK's net zero requirements for energy production, which is considered a critical national priority and set out in National Policy Statements for Energy NPS EN-1 (section 4.2) and EN-3. This therefore will benefit the national population rather than just the local population. The Scheme is also anticipated to benefit the population within approximately 20km of the Scheme, through providing employment and income especially during construction and peak replacement activities (as assessed in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]**), and providing skills and training opportunities (as secured through the **OSSCEP [APP-285]** through Requirement 18 of Schedule 2 to the **Draft DCO [APP-016]**). Where the Scheme is anticipated to benefit local people more specifically, this is done through providing onsite permissive paths to increase access to the countryside, providing improved landscape planting through reinforcing existing hedgerows and planting of new trees, providing biodiversity net gains through habitat improvements. This is secured through the **OLEMP [APP-283]** and **OPROWPPMP [APP-282]** through

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				Requirements 7 and 16 of Schedule 2 to the **Draft DCO [APP-016]**. That notwithstanding, the Applicant is committed to providing a Community Benefit Fund to allow for community-driven benefits that are not necessarily associated with the Scheme itself. The purpose is to establish a means to recognise local community needs that the Applicant wants to be able to contribute towards in recognition of the local impact of the Scheme.
MFS-015	Other Environmental Matters	Glint and Glare	Glint and Glare. Normally it would be possible to model the impact of glint and glare on residents and road/footpath users, but this modelling is impossible when dealing with panels that will be constantly moving whilst tracking the sun.	An assessment of glint and glare effects arising from the Scheme is provided in **ES Volume 1, Chapter 20: Other Environmental Matters [APP-072], Section 20.5: Glint and Glare**. The assessment considers potential effects on surrounding receptors, including road and rail users, residential properties, public rights of way, aerodromes and sensitive viewpoints within the Cotswolds National Landscape. Modelling glint and glare from tracking panels requires a model to account for the movement of panels throughout the day but this is well-understood within the industry and is implemented within the modelling software used in the preparation of the **ES Volume 3, Appendix 20-4: Solar Photovoltaic** **Glint and Glare Study [APP-261].** The assessment concludes that, with embedded mitigation measures, including the use of fixed-tilt panels at a maximum height of 2.5 metres where required, no significant glint or glare effects are predicted to occur as a result of the Scheme.
MFS-016	Other Environmental Matters	BESS Safety	Fire and Safety Risks – Battery Energy Storage Systems (BESS). The proposed large-scale Battery Energy	The Applicant has followed National Fire Chiefs Council (NFCC) guidance and commissioned a Plume Assessment Study to model toxic gas emissions and visibility impacts from a BESS

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			Storage System (BESS) in the Lime Down proposal brings additional risk. This is very close to Sherston. Fires in lithium-ion battery installations are rare but can be catastrophic. Once thermal runaway begins, such fires are extremely difficult to control, burning at high temperatures and releasing toxic gases. If the wind is in the wrong direction, I can envisage the evacuation of Sherston village and/or Malmesbury due to the plume of toxic smoke.	fire on all sensitive receptors within a 1km radius of the BESS area. The fire emissions modelled in the report were based upon recent UK Health Security Agency (UKHSA) requests for DCO BESS projects which explore both immediate air quality impacts together with annual UK air quality requirements. The UKHSA is a statutory consultee for the Scheme and has confirmed that they are satisfied with the Applicant's submitted documentation and Plume Assessment Study. Six worst case BESS fire locations (i.e. locations within the BESS Area closest to sensitive receptors) have been modelled as depicted in **ES Volume 2, Figure 15-5: BESS Fire Emissions Study Area[APP-166]**. The Concentrations of carbon monoxide (CO), formaldehyde, hydrogen chloride (HCl), hydrogen cyanide (HCN), hydrogen fluoride (HF), ammonia (NH_3), nitrogen dioxide (NO2) and particulates from a potential BESS fire have been modelled using an air quality dispersion model to determine the likely effects on human health. A high-level visibility assessment has also been undertaken using the modelled particulates results to determine the effect of BESS fire emissions on visibility on the local road and rail network to inform the **Outline Battery Safety Management Plan (OBSMP) [APP-286]**. The Plume Assessment Study has concluded that there are no significant toxic emission or visibility impacts at all sensitive receptor locations. The Applicant has also committed to commissioning an additional Plume Analysis Study at the detailed design stage as stipulated in Section 5.5.9 of the OBSMP and secured through the DCO: "*...at the detailed design stage a BESS system and site specific Plume Analysis study will be conducted to assess the environmental impact of a site incident to sensitive receptors within a 1 km radius. Toxic gas emissions to sensitive receptors must be below relevant public health exposure limit guidelines when the battery system of a BESS is fully*

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				consumed (burnt out), production of Particulate Matter (PM) and a visibility impact assessment on any transport links within a 1 km radius of the BESS area will also be included. The ERP produced at the detailed design stage (template outlined in Section 5.4.4) will incorporate all necessary emergency response procedures and actions based upon thermal runaway test data supplied by the BESS system provider." An **Outline Battery Safety Management Plan (OBSMP) [APP-286]** has been prepared for the Scheme using guidance from Dorset and Wiltshire Fire and Rescue Service and incorporating recommendations of the National Fire Chiefs Council. The safety objectives for the design of the BESS site are listed in Section 2.4 of the OBSMP. The OBSMP will be amended at Deadline 1 to fully accommodate the latest BESS safety requirements contained in NFPA 855 (2026) ensuring that any credible risks associated with battery storage are either prevented or fully mitigated if a BESS failure occurs. Section 2.4.2 of the OBSMP stipulates that: *"Final BESS design and site layout will have been validated through mandatory Large Scale Fire Testing (LSFT) and rigorous consequence modelling to minimise the requirement for any D&WFRS intervention in a thermal runaway incident. LSFT must establish minimum equipment spacing distances that demonstrate there is no fire propagation to adjacent BESS enclosures or ESS equipment. D&WFRS intervention in worst case scenarios would typically be limited to boundary cooling of adjacent BESS and Energy Storage System (ESS) units to prevent the fire from spreading. This strategy will be finalised with D&WFRS and be clearly communicated in the Emergency Response Plan (ERP);* • *To ensure that fire, smoke, and any release of toxic gases does not significantly impact site operatives, first responders, and the local community; and* • *To ensure that firewater run-off is contained and tested before release or, if necessary, removed by tanker and treated offsite."*

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				Final comprehensive risk assessment reports, BESS design and site-specific consequence modelling, and detailed Emergency Response Plans (ERPs) can only be drafted when based upon the specific BESS design selected at the detailed design stage. Key safety content requires that all equipment within the BESS area is defined, battery system operating limits and test data are fully defined, and the BESS failure protection system is defined. Incident response tactics require significant test data and rigorous consequence modelling from the specific BESS design to develop safe protocols for incident response. As now mandated under NFPA 855 (2026), the Applicant will only be able to select a BESS system that has undertaken Large Scale Fire Testing (LSFT). At the detailed design stage, the selected BESS LSFT data will be leveraged to fully inform inputs for risk assessment tools which will be utilised together with detailed consequence modelling to provide a comprehensive site operations and emergency response safety audit, this is stipulated in the OBSMP pre-construction requirements (Section 6). The **OBSMP [APP-286]** is secured through Requirement 6 (Battery safety management) in Schedule 2 of the **Draft DCO [APP-016]**, which provides that Work No. 2 must not commence until a Battery Safety Management Plan has been submitted to and approved by the relevant planning authority. The approved plan must be substantially in accordance with the Outline Battery Safety Management Plan. The Draft DCO also requires the relevant planning authority to consult with Dorset and Wiltshire Fire and Rescue Service and the Environment Agency before determining the application, and that the Battery Safety Management Plan must be implemented as approved.
MFS-016	Other Environmental Matters	Contamination to Water Sources	Risk of Contamination of Drinking Water and Rivers from Fire Suppression. If a fire were to occur, the water and chemicals required to	Potential contamination of ground and surface waters arising from a BESS fire and fire suppression activities has been assessed, and the assessment concludes that the proposed design would prevent uncontrolled release to the water

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			extinguish it would likely enter the soil and local watercourses, contaminating the aquifer that supplies nearby communities. This is a classic "*low risk, high consequence*" scenario – one that planning authorities must treat with the utmost seriousness. Even if the statistical likelihood is low, the consequences of failure would be severe and long-lasting, with potential impacts on public health and the environment.	environment, including groundwater and connected watercourses. This is set out in **ES Volume 1, Chapter 11 Hydrology, Flood Risk and Drainage [APP-063]**, supported by the BESS specific drainage, containment and pollution control strategy in **ES Volume 3, Appendix 11-6 Flood Risk Assessment and Drainage Strategy – Lime Down D BESS [APP-215]**. The BESS drainage strategy incorporates engineered containment, isolation and controlled drainage to retain firewater and any potentially contaminated runoff within the site, breaking pathways to soils, aquifers and surface waters. These measures are complemented by the operational controls and incident response framework set out in **Outline Battery Safety Management Plan [APP-286]**, which addresses fire response, management of contaminated water and protection of the surrounding environment. Section 5 of the OBSMP covers all requisite firefighting requirements for the Scheme including fire service access, firefighting water supply, and emergency planning requirements. The Applicant is currently drafting a Statement of Common Ground (SOCG) with the Environment Agency (EA) on Scheme environmental protection issues including the BESS area drainage strategy. The agreed strategy document will be appended to the OBSMP at Deadline 1, to provide further assurance that all water pollution risks from a BESS fire are fully mitigated. The EA is a statutory consultee for the OBSMP and drainage strategies and must approve the final BSMP and drainage design at detailed design before construction of the BESS commences. The **OBSMP [APP-286]** is secured through Requirement 6 (Battery safety management) in Schedule 2 of the **Draft DCO [APP-016]**, which provides that Work No. 2 must not commence until a Battery Safety Management Plan has been submitted to and approved by the relevant planning

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				authority. The approved plan must be substantially in accordance with the Outline Battery Safety Management Plan. The Draft DCO also requires the relevant planning authority to consult with Dorset and Wiltshire Fire and Rescue Service and the Environment Agency before determining the application, and that the Battery Safety Management Plan must be implemented as approved. Detailed implementation of firewater management and pollution control measures will be set out within the relevant management plans, including the OBSMP, which are secured through requirements in Schedule 2 of the Draft Development Consent Order and must be submitted to and approved by the relevant planning authority prior to construction and operation, ensuring that groundwater and drinking water supplies are appropriately protected.
MFS-017	Human Health	Mental Health	Mental Health. Many residents enjoy walking, cycling and riding through the byways and footpaths in our beautiful landscape. I believe that many residents mental health will be adversely impacted if they are walking along paths bordered by high security fences overlooking a sea of black solar panels in every direction; Residents choose to live in this rural area. If they wanted to live in an industrial landscape they would choose to live somewhere else.	Impacts on mental health and wellbeing are assessed in **ES Volume 1, Chapter 18: Human Health [APP-070]**. This chapter provides a comprehensive assessment of the Scheme's potential effects on human health, including mental health and wellbeing, through consideration of a broad range of health determinants. These include access to open space and recreation, transport and connectivity, community identity and cohesion, employment and income, noise and vibration, air quality, and access to health and social care services. The assessment applies a health *"lens"* to the findings of relevant technical chapters and concludes that, with embedded mitigation and additional measures secured, the Scheme would not give rise to significant adverse effects on population health, including mental health and wellbeing. The assessment focuses on communities within a 2 km Study Area surrounding the Scheme, identified as those most likely to experience potential health-related effects. Baseline analysis demonstrates that rates of poor mental health within the Study Area are generally lower than national averages, and

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				the assessment considers potential pathways by which the Scheme could influence mental wellbeing, including changes to environment, amenity, access and community factors. Residual effects following mitigation are assessed as not significant at any phase of the Scheme. Consultation with Wiltshire Council's Public Health Team has informed the approach to mental health considerations, as documented in **ES Volume 3, Appendix 18-1: Human Health Consultation [APP-244]**. Through this engagement, the Applicant has committed to signposting locally available mental health and wellbeing resources to members of the public engaging with the Scheme, using information provided by Wiltshire Council's Public Health Team. The Applicant will continue to monitor consultation responses relating to mental health and will provide appropriate signposting to existing local support services where requested. The Applicant notes that the assessment methodology for health and wellbeing has been agreed with Wiltshire Council's Public Health team and is set out in the Statement of Common Ground with Wiltshire Council to be submitted at Deadline 1. A detailed assessment of the likely significance of effects from the Scheme on the use and desirability of individual PRoW, and recreational access to the countryside, has been included in the **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** and **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]**. This assessment considers the impact on individual recreational routes – be that practically in their use, and their enjoyment and desirability. The Applicant confirms that the majority of significant adverse effects can be mitigated, however understands that some significant adverse effects to users of PROWs and unsurfaced roads in Lime Down E cannot be mitigated further during construction. No significant residual effects are anticipated during the operational phase of the Scheme.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				The Applicant notes that the assessment of PROW impacts and mitigation is under discussion with Wiltshire Council's Countryside Access Team and is set out in the Statement of Common Ground with Wiltshire Council to be submitted at Deadline 1. The Applicant confirms that existing PRoW are to be controlled within the Scheme design with PRoW management strategies set out in the **Outline Public Rights of Way and Permissive Paths Management Plan (PROWPPMP) [APP-282]**. These are confirmed as embedded mitigation measures in Section 16.9 of ES Chapter 16. New permissive access routes have been included in the Scheme design, shown as Work No.10 on the **Works Plan [APP-007]** and shown on **ES Volume 2, Figure 3-4: Landscape and Ecology Mitigation Plan [APP-283]**. These are considered as additional mitigation and enhancement measures in Section 16.11 of ES Chapter 16. The PRoW and Permissive Paths MP is secured through Requirement 16 of Schedule 2 of the **Draft DCO [APP-016]**. The preparation, approval and implementation of the detailed CEMP and CTMP, substantially in accordance with the outline plans, are secured through Requirements 13 and 15 respectively in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that impacts on PRoW and recreational routes are appropriately managed during construction.
MFS-018	Hydrology, Flood risk an d Drainage	Flooding	Flood risk. We live on top of a complicated geology with two important acquifers below us, which supply drinking water to this area, to Bath and even to London. We are also	The hydrology, flood risk and drainage assessment considers surface water, fluvial flood risk, groundwater and downstream receptors across the Bristol Avon catchment and concludes that the Scheme would not increase flood risk or adversely affect groundwater resources. This assessment is set out

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			at the head of the Bristol Avon catchment. We already have flooding issues in the area with sometimes major flooding at Brook End (near Luckington), Malmebury, Corston, Chippenham and beyond. Its vital that there is no increased risk of flooding caused by the unpredictable runoff from solar panels which could be at very different orientations depending on the time of day. I see little serious evaluation of this risk.	in **ES Volume 1, Chapter 11 Hydrology, Flood Risk and Drainage [APP-063**], which considers existing flooding constraints and effects beyond the Order limits, including locations downstream of the Site. The submitted assessment presented in **ES Volume 3, Appendix 11-1 Flood Risk Assessment and Drainage Strategy - Lime Down Covering Report [APP-210]** reflects established hydrological evidence that the addition of solar panels over a vegetated field does not materially increase runoff volumes, peak discharges or response times, and that changes in hydrologic response are primarily associated with alterations to ground cover beneath the panels rather than the panels themselves. Panelled areas are therefore designed so rainfall continues to drain to ground, with no creation of extensive impermeable surfaces and with controls in place to avoid any increase in discharge to watercourses. On this basis, the assessment presented in **ES Volume 1, Chapter 11 Hydrology, Flood Risk and Drainage [APP-063]** concludes that the Scheme would not increase flood risk to downstream locations such as Brook End, Malmesbury, Corston or Chippenham. Measures to manage surface water runoff and drainage are set out in the outline drainage and construction management plans (**ES Volume 3, Appendix 11: Flood Risk Assessment and Drainage Strategy [APP-210 to APP-218] and Outline Construction Environmental Management Plan [APP-277]** accompanying the Application. Where drainage measures are necessary, these include permeable surfacing, infiltration features, swales and attenuation storage to manage surface water and maintain greenfield runoff behaviour, as applicable. Consistent with NPS EN-3 paragraph 2.10.84, these controls distinguish between solar PV panel areas, which drain to the existing ground and do not generally

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				give rise to significant drainage effects, and associated infrastructure where runoff controls are required. The preparation, approval and implementation of the detailed drainage and construction management plans, substantially in accordance with the outline plans, are secured through Schedule 2 of the **Draft Development Consent Order [APP-016]**. This secures delivery and maintenance of the drainage strategy for Scheme infrastructure, together with soil and water management controls during construction, ensuring there is no material increase in off-site flood risk over the lifetime of the Scheme.
MFS-019	Cultural Heritage	Archaeology	Archaeology. The proposal from Island Green Power already admits that the project will cause archaeological harm in an area where there is evidence of Roman and pre-Roman settlements. This issue needs to be addressed.	**ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, supported by appendices in **ES Volume 3 (12.2 to 12.5) [APP-220 to APP-230],** has assessed the potential impact of the scheme on identified archaeological assets. The chapter concluded that following mitigation, residual effects would either be neutral/negligible or minor/moderate and therefore not significant. Where required, appropriate mitigation is proposed such as preservation in situ or Strip, Map and Record. See Section 12.9 of **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]** for embedded mitigation and Section 12.11 for additional mitigation. An outline archaeological mitigation strategy is provided in **ES Volume 3, Appendix 12.6 Archaeological Mitigation Strategy [APP-230]** and secured through Requirement 12.

4.39 Grittleton Sevington and Leigh Delamere Village Hall and Recreation Ground

Table 4-39 RR-1743

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
GS-001	Description and DCO Process	Introduction	My name is Lawrence Copeland. I am a resident of Grittleton and a Trustee of the Grittleton Village Hall Charity (see Background below). I make this submission in my capacity as a Trustee of the Village Hall Charity for and on behalf of the Trustees of the Village Hall Charity, collectively. The Trustees of the Village Hall Charity object to the proposed Lime Down Solar Power and battery energy storage project. Main reasons are:	The Applicant notes this comment.
GS-002	Transport and Access	Traffic Impact	Due to its proximity to the Village Hall, the construction required for the underground cables, including compound, could significantly impact the number of users of the Hall. 1.1. The heavy construction traffic, with its disruption, noise & pollution, coupled with the safety aspect of getting to the Hall along a narrow road, would dissuade people from attending the activities offered.	Grittleton Village Hall has been assessed as a specific recreational receptor in **ES Volume 3 Appendix 16-2 Tourism and Recreation Receptor Tables [APP-241]**. This identifies that during construction, a residual medium-term temporary moderate-minor adverse effect is anticipated to users of these facilities. This is not a significant effect, subject to the implementation of additional mitigation measures to control HGV movements to and from the construction compound. Construction deliveries are restricted to outside of peak hours and not on Sundays secured as part of the CTMP. These measures are set out in the **Outline Construction Traffic Management Plan (OCTMP) [APP-287]**, secured by Requirement 15 in Schedule 2 to the **Draft DCO [APP-016]**.
GS-003	Description and DCO Process	Background	Background of the Village Hall Charity Grittleton has a modern village hall and sports field/recreation ground, including a cricket square, a	The Applicant notes these comments, and it confident the level of assessment to identify the likely significance of effects to the village hall, as a locally important recreational facility, is proportionate and robust.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			Victorian Cricket Pavillion, a well-equipped children's playground and a Multi-Use Games Area with an all-weather surface. That ground, referred to elsewhere in this submission as 'the Village Ground' has an area of 5.74 acres and includes the site of the current village hall. The Village Ground was conveyed by former owners of Grittleton House and the Grittleton Estate to Trustees, members of the local community, by a Conveyance made on 11 July 1984 ('the 1984 Conveyance'). In effect, the 1984 Conveyance vested the Village Ground in the community for the benefit of those living in the community. The freehold title to the Village Ground is registered with title absolute at Land Registry under title WT287079. The Village Ground is vested in The Official Custodian for Charities on behalf of the Trustees of the charity known as Grittleton Sevington and Leigh Delamere Village Hall and Recreation Ground. Grittleton Sevington and Leigh Delamere Village Hall and Recreation Ground is a registered charity (Charity number 290380). The working name of that charity is 'Grittleton Village Hall'. It is referred to elsewhere in this submission as 'the Grittleton Village Hall Charity'.	

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			The 1984 Conveyance records the objects of the Grittleton Village Hall Charity namely (and to quote from the 1984 Conveyance) the provision and maintenance of a village hall and a recreation ground for the use of the inhabitants of the Parish of Grittleton Sevington and Leigh Delamere, without distinction of political religious or other opinions including use for meetings lectures and classes and for other forms of recreation and leisure-time occupation with the object of improving the conditions of life for the said inhabitants. The 1984 Conveyance also records a requirement for administration and management of the Grittleton Village Hall Charity, including a requirement for a Committee of Management whose members shall be the Charity Trustees of the Charity for the purposes of the Charities Act 1960. There are eleven Trustees of the Grittleton Village Hall Charity, all residents in the local community. They are referred to elsewhere in this submission as the GVH Trustees or simply 'the Trustees'. The Village Ground is within the boundary of the Cotswolds National Landscape and also the Grittleton Conservation Area (see Appendix A). Being located at the eastern edge of Grittleton village and looking out over open farmland or parkland,	

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			the Village Ground is in a tranquil spot, ideally suited to recreational and leisure activities. It is the home ground of Grittleton Cricket Club. Cricket has been played on this ground since before 1868. Apart from the Grittleton Cricket Club, the ground is also used by the village pub team, The Neeld Arms, service personnel from Buckly Barracks in Hullavington and a Chipping Sodbury Cricket Team from South Gloucestershire. The Village Hall was architect designed and built towards the southern end of the Village Ground in the late 1980's. It was completely refurbished in 2015 and can accommodate a wide variety of activities and functions ranging from wedding celebrations, village pantomimes, film nights and music evenings, band/orchestra rehearsals and wellbeing classes such as pilates, yoga and ballroom. Over 130 people each week take part in the various classes offered and during the pantomime period, over 150 villagers of all ages will play a part in its production. The playground, located in the southeast corner of the Village Ground was first laid out, fenced and equipped approximately 20 years ago with the benefit of funds totalling £40,000 raised entirely by fund raising activities within the	

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			community. The Multi-Use Games Area, situated adjacent to the Village Hall and the playground, was first constructed some years later at a cost of £50,000 of which £25,000 was raised by fund raising activities within the community. The raising of those funds was a phenomenal achievement for a community of 160+ households and a measure of its commitment to provide such facilities at the Village Ground for all to use. The playground has been much modernised since its original construction. The Village Hall, Multi-Use Games Area and playground are carefully managed and maintained by the GVH Trustees. As a popular venue for daytime and evening activities and functions, the Village Hall benefits from regular and frequent bookings for which hire charges are payable. The income in the form of hire charges received by the Grittleton Village Hall Charity for those bookings is an essential source of income (92% over the last 3 years) to help with payment of all outgoings on and costs of maintenance of the Village Hall, the Multi-Use Games Area and the playground.	
GS-003	Transport and Access	Cable Route Corridor	Impact on the running of the Hall The GVH Trustees see from Lime Down Solar's application that the proposed project includes:	Grittleton Village Hall has been assessed as a specific recreational receptor in **ES Volume 3 Appendix 16-2 Tourism and Recreation Receptor Tables [APP-241]**. This identifies that during construction, a residual medium-term

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			a. the laying of underground cables linking the proposed Lime Down Solar Power and battery energy storage facilities to the Melksham substation along a route passing close to the eastern boundary of the Village Ground b. a contractor's compound located close to the Village Ground. The Trustees are most concerned that, if the proposed Lime Down Solar Power and battery energy storage project were to go ahead, the additional vehicular traffic generated by the laying of underground cables and use of the contractor's compound close to the Village Ground (See Appendix B), including articulated lorries, HGVs, vans and cars transporting materials, workers and others to and from site for a period of two years or longer, would create noise and pollution and endanger pedestrians and cyclists.	temporary moderate-minor adverse effect is anticipated to users of these facilities. This is not a significant effect, subject to the implementation of additional mitigation measures to control HGV movements to and from the construction compound. These measures are set out in the **Outline Construction Traffic Management Plan (OCTMP) [APP-287]**, secured by Requirement 15 in Schedule 2 to the **Draft DCO [APP-016]**.
GS-004	Transport and Access Noise and Vibration	Noise and Pollution from Construction Traffic	The noise and pollution would be to the detriment of the tranquillity and other special qualities of the facilities at the Village Ground. This would likely cause users of the facilities, including children and adults, to reconsider their participation in the various wellbeing and physical activities offered. It is hard to relax and unwind with constant traffic, gear changing and braking as they	The assessment of likely effects to Grittleton Village Hall as assessed **in ES Volume 3 Appendix 16-2 Tourism and Recreation Receptor Tables [APP-241]** identifies that during construction, a residual medium-term temporary moderate-minor adverse effect is anticipated to users of these facilities. This has considered likely amenity impacts from noise and visual impacts as a result of the proximity of cable works and the construction compound to the village hall complex, and the likely impact on accessibility and amenity as a result of HGV movements. This is not a significant effect, subject to the implementation of additional

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			prepare to turn into the cable route entrances or accelerating away.	mitigation measures to control HGV movements to and from the construction compound and cable route access points. These measures are set out in the **Outline Construction Traffic Management Plan (OCTMP) [APP-287]**, secured by Requirement 15 in Schedule 2 to the **Draft DCO [APP-016]**.
GS-005	Transport and Access	Traffic Impacts	The timing of construction traffic arriving/departing, 09:00 - 17:00, avoiding 'network peak hours' clashes with the peak income earning periods for the Village Hall, 09:30 - 12:00. This is assuming that the construction workers will need to arrive as soon after 09:00 as possible. There are also concerns over walking or cycling to the Village Ground. Many users of amenities at the Village Ground walk on footpaths along The Street or cycle along The Street to gain access to and from the Village Ground. In particular, there is likely to be a perception of a risk of harm to users of the playground and the Multi-Use Games Area, those outside facilities being just yards away from the roadway over which the heavy construction traffic would pass. The number of users of those facilities would reduce as a consequence. A reduction in bookings of the Village Hall would cause a reduction in the income receivable by the Grittleton Village Hall Charity to the detriment of the Charity's financial position and	Vehicle movements for workers and for HGV deliveries have been proposed to be controlled through the measures set out in the **Outline Construction Environmental Management Plan (OCEMP) [APP-277]** and **Outline Construction Traffic Management Plan (OCTMP) [APP-287]**. These set out that construction workers are anticipated onsite from 07:00-18:00 on weekdays and 08:00-13:30 on Saturdays, with traffic movements restricted during morning (08:00-09:00) and evening (17:00-18:00) peaks. HGV deliveries will be further restricted to the hours of 09:30-16:30 during weekdays and 09:30-13:30 on Saturdays. These measures have been implemented to avoid traffic movements at peak times, thus minimising impacts on other highway users, including non-motorised users (such as pedestrians and cyclists). Resultantly, the assessment in **ES Volume 1 Chapter 13: Transport and Access [APP-065]** does not identify any significant adverse effects to highway users. The Applicant is therefore confident that the Scheme would not result in any significant indirect impacts to the use of and access to the Village Hall and its supporting sports and play facilities. A final CEMP and CTMP would be prepared post consent and must be substantially in accordance with the **OCEMP [APP-277]** and **OCTMP [APP-287]** and approved by the relevant local planning authorities, as secured by

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			would also be detrimental to the community.	Requirement 13 and 15 in Schedule 2 of the **Draft DCO [APP-016]**, respectively.
GS-006	Transport and Access	Access	Access to the Village Hall Occasionally, it is necessary for users of the Village Hall or other amenities at the Village Ground to lawfully park their vehicles on The Street adjacent to the Village Ground. This happens on occasions when there is insufficient space in the metalled car park within the Village Ground. The Village Ground is accessed from The Street, Grittleton - a minor road, classified under the Government's road classification system as a 'classified unnumbered' road. The parking of vehicles on The Street has the effect of reducing the width of The Street capable of being used by other vehicles. In effect, this can make lengthy sections of The Street single track. The likelihood of damage to Village Ground user's vehicles parked on The Street would be increased if the proposed Lime Down Solar Power and battery energy storage project were to go ahead and additional vehicular traffic generated by the project, including articulated lorries, HGVs, vans and cars transporting materials, workers and others to and from site were to be routed through Grittleton.	The Street through Grittleton does not form part of the construction routes for the Solar PV Sites and instead would serve two accesses for construction within the Cable Route Corridor. The proposed construction routes have been carefully assessed and are considered to be the most appropriate routes to the Scheme. The Street is already suitable for existing traffic and would be able to accommodate the additional traffic required. Construction traffic would also be temporary and controlled through measures in a CTMP. As set out in Paragraph 13.10.66 of **ES Volume 1, Chapter 13: Transport and Access [APP-065]**, the construction of the Cable Route Corridor is anticipated to generate a low level of trips and will only be in use for a temporary construction period of approximately 90 days.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
GS-007	Transport and Access	Traffic Impacts	Grittleton is located relatively close to the M4 motorway, part way between M4 Junction 17 and M4 Junction 18. The Street, Grittleton is on a vehicular route which has become an alternative route for users of the M4 who, assisted by satellite navigation systems, choose to divert from the M4 to avoid obstructions or delays on the M4 between Junctions 17 and 18. This happens surprisingly frequently and chaotic scenes on The Street have been witnessed when heavy volumes of traffic, diverted from the M4 and coming from opposite directions, attempt to negotiate a way through Grittleton by passing along The Street the useable width of which is reduced by cars lawfully parked on The Street. In these circumstances, vehicles have been seen mounting the kerbs at the side of The Street, driving along the pavements at the side of The Street and making a dash for a gap in the traffic in an effort to get through. Situations such as those described would be aggravated and made even worse if the proposed Lime Down Solar Power and battery energy storage project were to go ahead and additional vehicular traffic generated by the project, including articulated lorries, HGVs, vans and cars transporting materials, workers and others to and from site were to	The Street through Grittleton does not form part of the construction routes for the Solar PV Sites and instead would serve two accesses for construction within the Cable Route Corridor. The construction deliveries are along fixed routes and restricted to outside of network peak hours as set out in the **Outline Construction Traffic Management Plan (OCTMP) [APP-287]**. No rerouting will be made to avoid delays due to these fixed construction routes and trips outside of peak hours makes any delays less likely. If a diversion is in place, then the low number of vehicles generated by the cable route access will not add significantly to the existing diverted traffic. The proposed construction routes have been carefully assessed and are considered to be the most appropriate routes to the Scheme. The Street is already suitable for existing traffic and would be able to accommodate the additional traffic required. Construction traffic would also be temporary and controlled through measures in a **(OCTMP) [APP-287]**. As set out in Paragraph 13.10.66 of **ES Volume 1, Chapter 13: Transport and Access [APP-065]**, the construction of the Cable Route Corridor is anticipated to generate a low level of trips and will only be in use for a temporary construction period of approximately 90 days. Rerouting of traffic between Junction 17 and 18 of the M4 would also only be occasional.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			be routed through Grittleton. Such impacts would be detrimental to users of amenities at the Village Ground.	
GS-008	Socio-Economics, Tourism and Recreation	Conclusion	Summary Island Green Power has stated that the "*project will minimise impacts*" and "*minimise effects*" but GVH Trustees are most concerned that adverse impacts and effects from this development would be unavoidable and would have negative effects on users of amenities at the Village Ground. Alongside the detriment to their physical health and mental wellbeing, if enough of these users were to seek alternative locations for their classes, the financial impact on the Village Hall Charity would be significant, impacting its ability to provide for the use of the inhabitants of the Parish of Grittleton Sevington and Leigh Delamere. Appendix A " Map of Grittleton Conservation Area Appendix B " Extract from Lime Down 'Outline Construction Traffic Management Plan' showing location of Village Hall Ground and Construction Entrances to the Cable Route	The assessment of effects to users of Grittleton Village Hall acknowledges there is likely to be a medium-term temporary moderate-minor adverse effect during construction. Whilst the Applicant has committed to mitigate effects as much as possible, it is appreciated that there will be some level of adverse effect to amenity and use. That notwithstanding, the Applicant seeks to reiterate that this is a temporary effect, and will last only as long as construction works on this section of the cable route are ongoing. The construction of the cable route has been assessed throughout the **ES [APP-052 to APP-265]**, which considers the effects associated with these works. The **ES [APP-052 to APP-265]** assesses the cable route within defined parameters, including limits on working width and trench dimensions (as identified within **ES Volume 1 Chapter 3 The Scheme APP-055**-to ensure that a reasonable worst-case scenario is assessed. The detailed design and construction of the cable route will be undertaken within the parameters (including in relation to width and depth of the cable trench) assessed and authorised by the DCO. Measures to manage and minimise construction effects, including reinstatement of land following installation, are set out in the **Outline Construction Environmental Management Plan (CEMP) [APP-277]**.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				The Outline CTMP includes community liaison measures to keep local communities informed of construction activity and to provide a contact point for feedback should any issues arise. Requirement 13 in Schedule 2 to the **Draft DCO [APP-016]** secures that prior to construction, a CEMP must be submitted to and approved by the relevant planning authority, and that CEMP must be substantially in accordance with the **Outline CEMP [APP-277]**All construction works will be carried out in accordance with the approved CEMP. Furthermore, the Applicant has considered the likely effects on health and wellbeing as a result of impacts to 'open space, leisure and play' facilities in **ES Volume 1 Chapter 18: Human Health [APP-070]**. Again, this identifies that whilst there is some level of adverse effect predicted as a result of the Scheme (overall a minor adverse effect), this is anticipated to be temporary and is not considered a significant effect.

4.40 Whatley Manor Hotel

Table 4-40 RR-4894

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
WMH-001	Soils and Agriculture	Use of Farmland	I totally object to this project which is destroying valuable agricultural land. Use roofs, verges of motorway, verges of train tracks... Chippenham if full of vast industrial buildings, put solar panels on their roofs! We need food in this country, stop destroying valuable land with solar farm and housing estates. Think smart like other countries!!	An assessment of the potential effects of the Scheme on soils and agricultural land is provided in **ES Volume 1, Chapter 17: Soils and Agriculture [APP-069]**. This chapter considers baseline agricultural land quality, including Best and Most Versatile (BMV) land, and assesses likely significant effects arising from construction, operation and decommissioning of the Scheme, together with embedded mitigation measures. The areas of each Agricultural Land Classification (ALC) grade affected by the Scheme are set out in ES Chapter 17, Section 17.7. Of the agricultural land within the Solar PV Sites, approximately 477.4 hectares (around 67%) is classified as Subgrade 3b or Grade 4 and is therefore not BMV land. There is no Grade 1 land, around 30.8 hectares (approximately 4%) of Grade 2 land, and approximately 209.3 hectares (around 29%) of Subgrade 3a land. The distribution of ALC grades is shown in **ES Volume 2, Figure 17-2: Agricultural Land Classification Mapping [APP-172]**. The Applicant has had regard to agricultural land quality in the design and site selection process and has sought, where practicable, to locate infrastructure on lower quality land. The Scheme will result in a temporary but long-term and reversible loss of agricultural land for the operational life of the Scheme. As set out in ES Chapter 17, Section 17.10, this gives rise to a temporary, long-term moderate adverse effect on agricultural land overall, and a temporary, long-term major/moderate adverse effect on BMV land, both of which are assessed as significant. These effects are fully reported in the ES and are a matter for the Secretary of State to weigh in the planning balance against the need for the Scheme and its wider benefits. There are no significant permanent effects on agricultural land, as all land will be returned to its original use and condition as far as practicable following decommissioning. The Applicant notes that the approach to assessing the quality of the agricultural land is under further discussion with Natural England and is set out in the relevant Statement of Common Ground to be submitted at Deadline 1.

				Measures to avoid and minimise effects on soils and agricultural land are embedded within the Scheme design and secured through the DCO. These include the preparation and implementation of a **Soil Resources Management Plan (SRMP) [APP-280]**, which will control soil handling, storage and reinstatement during construction, operation and decommissioning, and a requirement to prepare and implement a Decommissioning Strategy in accordance with the **Outline Decommissioning Strategy [APP-279]**. Through the establishment and maintenance of long-term grassland beneath and between the solar arrays, soil health, quality and structure are anticipated to improve over the lifetime of the Scheme, resulting in a temporary, moderate beneficial effect on soil resources at decommissioning, which is assessed as significant (ES Chapter 17, Sections 17.10 and 17.12). Government led agricultural initiatives, such as the Sustainable Farming Incentive which is relaunching later in 2026, have prioritised soil health, environmental enhancement and climate resilience, recognising that long-term food security is influenced by a range of factors beyond land take alone, including soil condition, climate change and environmental pressures. The Scheme allows soils to remain in situ and undisturbed during operation, supporting soil recovery and long-term land health, with land reinstated and returned to agricultural use as far as practicable following decommissioning. No permanent loss of agricultural land is anticipated. The Applicant does not consider that food security will be compromised by the Scheme (or solar energy more widely). The latest figures to September 2024 indicate that solar occupied around 21,200 ha of agricultural land in the UK. In 2025, 545,000 ha of arable land in England were left uncropped (source: Department for Environment, Food & Rural Affairs, Agricultural land use in England at 1 June 2025). It should also be noted that food security is not identified as an issue within the suite of Energy National Policy Statements or the National Planning Policy Framework (NPPF).

				Further, the Government's UK Solar Roadmap (2025) states that solar development is not considered to compromise food security, but that the climate and nature crisis poses the greatest long-term risk to food security - a risk which the Scheme directly helps to address by providing a secure, low-carbon source of electricity. In relation to suggestions that brownfield land or alternative locations should be used, including rooftop, these matters are addressed in **ES Volume 1, Chapter 4: Alternatives and Design Evolution and in the Statement of Need [APP-056 and APP-266]**. The Applicant has considered alternatives, including previously developed land and other forms of solar deployment, as part of the site selection and design evolution process. As shown in Table 2-2 of **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]**, the Applicant has considered previously developed land/brownfield land over 1 hectare within the area of search, based on the brownfield land registers of the relevant Local Planning Authorities, and concluded that none of the sites are large enough to provide a viable land parcel of at least 40 ha and sites were not considered to be available as they have planning permission for residential development and/or are allocated for residential/mixed use development. National policy and government guidance, as set out in the **Statement of Need [APP-266]**, recognise that while rooftop and smaller-scale solar installations are an important part of the energy mix, they cannot alone meet the scale of capacity required to achieve clean power and net zero objectives. Large-scale ground-mounted solar therefore remains necessary in addition to, not instead of, rooftop solar.

4.41 Whatley Manor Hotel & Spa

Table 4-41 RR-4895

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
WMHS-001	Landscape and Visual Soils and Agriculture	Scheme Scale and Location	To Whom it may concern, I am writing to lodge my formal objection to the proposed development of a large-scale solar farm covering approximately 3000 acres of agricultural land located within an area of outstanding natural beauty (AONB). While I do support and like the idea of transitioning to renewable energy, this proposal is absolutely wrong in terms of scale and location. The AONB area exists to protect and conserve some of the nations most loved landscapes, the proposed planning of panels, fencing, cameras and other infrastructure's would permanently damage and change the visual character of this area.	<u>Scale</u> The Scheme has been designed to deliver the greatest possible benefit from the available land and the available grid connection, whilst avoiding, minimising and/or mitigating harmful environmental effects. The total area within the DCO Order Limits encompasses approximately 1,237 hectares (ha). Of this, the 'Solar PV Sites' comprise approximately 749.1 ha of land. Around 479.5 ha of this land is proposed as being required for installation of solar PV, battery storage, and associated infrastructure. The remaining 269.5 ha would provide areas dedicated to ecological mitigation, measurable Biodiversity Net Gain (BNG) delivery, landscaping, offsets and agricultural land managed for environmental enhancement and habitat creation. The Applicant remains committed to delivering a Scheme that makes a meaningful contribution to the UK's transition to net zero, while also seeking to minimise adverse impacts and maximise opportunities for environmental enhancement and community benefits. <u>Agricultural Land Use</u> An assessment of the potential effects of the Scheme on soils and agricultural land is provided in **ES Volume 1, Chapter 17: Soils and Agriculture [APP-069]**. This chapter considers baseline agricultural land quality, including Best and Most Versatile (BMV) land, and assesses likely significant effects arising from construction, operation and decommissioning of the Scheme, together with embedded mitigation measures. The areas of each Agricultural Land Classification (ALC) grade affected by the Scheme are set out in ES Chapter 17, Section

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				17.7. Of the agricultural land within the Solar PV Sites, approximately 477.4 hectares (around 67%) is classified as Subgrade 3b or Grade 4 and is therefore not BMV land. There is no Grade 1 land, around 30.8 hectares (approximately 4%) of Grade 2 land, and approximately 209.3 hectares (around 29%) of Subgrade 3a land. The distribution of ALC grades is shown in **ES Volume 2, Figure 17-2: Agricultural Land Classification Mapping [APP-172]**. The Applicant has had regard to agricultural land quality in the design and site selection process and has sought, where practicable, to locate infrastructure on lower quality land. The Scheme will result in a temporary but long-term and reversible loss of agricultural land for the operational life of the Scheme. As set out in Section 17.10 of **ES Volume 1, Chapter 17: Soils and Agriculture [APP-069]**, this gives rise to a temporary, long-term moderate adverse effect on agricultural land overall, and a temporary, long-term major/moderate adverse effect on BMV land, both of which are assessed as significant. These effects are fully reported in the ES and are a matter for the Secretary of State to weigh in the planning balance against the need for the Scheme and its wider benefits. There are no significant permanent effects on agricultural land, as all land will be returned to its original use and condition as far as practicable following decommissioning. The Applicant notes that the approach to assessing the quality of the agricultural land is under further discussion with Natural England and is set out in the relevant Statement of Common Ground to be submitted at Deadline 1. Measures to avoid and minimise effects on soils and agricultural land are embedded within the Scheme design and secured through the DCO. These include the preparation and implementation of a **Soil Resources Management Plan**

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				(OSRMP) [APP-280], which will control soil handling, storage and reinstatement during construction, operation and decommissioning, and a requirement to prepare and implement a Decommissioning Strategy in accordance with the **Outline Decommissioning Strategy [APP-279]**. Through the establishment and maintenance of long-term grassland beneath and between the solar arrays, soil health, quality and structure are anticipated to improve over the lifetime of the Scheme, resulting in a temporary, moderate beneficial effect on soil resources at decommissioning, which is assessed as significant (Sections 17.10 and 17.12 of **ES Volume 1, Chapter 17: Soils and Agriculture [APP-069]**). <u>Location</u> National Policy Statement EN-3 Paras 2.10.11 and 2.10.18 explain that the availability of grid connection, suitable irradiance levels, and local topography are key inputs to the selection of sites suitable for large-scale solar generation developments. The number of locations within the UK at which large-scale solar generation is suitable is therefore likely to be limited, and this is a material issue when considering how the UK is to meet the urgent need for low carbon generation as is set out in the NPSs. This point is expanded upon in the **Statement of Need [APP-266]** in particular in Section 4.3. Chapter 8 of the **Statement of Need [APP-266]** provides evidence to support the suitability of the proposed location of the Scheme for large-scale solar plus storage in relation to the timeliness and availability of the grid connection, transmission system operability and the decarbonisation and energy security benefits the Scheme will bring forward from this location. As set out in **ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP-056]** and the Site Selection

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				Assessment Report at **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]** an appraisal of alternative sites within a 20km radius of the Existing National Grid Melksham Substation has been undertaken, which concludes that there are no more suitable locations within the 20km search area than the proposed location for the Scheme. <u>Proximity to the Cotswolds National Landscape</u> The Applicant confirms that the Scheme is not located within the Cotswolds National Landscape (formerly Area of Outstanding Natural Beauty). The Cotswolds National Landscape (CNL) is fully assessed as a standalone receptor within **ES Volume 3, Appendix 8.6: Assessment of Effects on the Special Qualities of the Cotswolds National Landscape [APP-197]**. This assessment considers the effects of the Scheme on landscape character, visual amenity and the special qualities of the CNL, including tranquillity. The assessment found that there would be some short term impact to landscape character within the setting of the CNL but due to the avoidance measures embedded within the Scheme, harm to the CNL itself would be minimal with beneficial effects in the long term which would further the purposes of the designation. In respect of visual amenity, some short-term adverse effects would be experienced by a small number of visual receptors with views to and from the CNL. However, these would reduce over time as a result of the proposed mitigation. The assessment of effects on the special qualities of the CNL scoped out 3 SQs as there is no association with the Site. The assessment found that there are no direct effects on the remaining SQs. There are some Minor/ Negligible short-term effects on a small number of visual receptors within the

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				setting of the CNL which effect SQ7 -Tranquillity and SQ13 Archaeology and historic associations. However, these effects are mitigated by Year 15 when proposed vegetation has matured. The assessment also found that there would be beneficial effects on SQ 6 – Biodiversity and nature recovery as a result of the delivery of approximately 119.7 hectares of flower-rich neutral grassland (as defined in the **Biodiversity Net Gain Assessment Report (BNG assessment) [APP-273**]) and SQ 12 - An accessible landscape as a result of the delivery of approximately 12.8km of new permissive paths within the setting of the CNL. The remaining SQs would remain entirely intact. The Scheme was refined through an iterative design process to avoid and reduce effects on the CNL and its setting. Panels along the edge of the CNL were removed from the Order Limits in fields C2, C3 and C4 where significant visual effects on receptors within the CNL were identified. Panels were also removed from fields C1, C6, C8, the western section of C9 and the majority of C10, with this land now proposed for ecological mitigation to protect the setting of the CNL. In addition, panels within fields A11 and A12 were removed, and the land repurposed for ecological mitigation to protect the setting of the CNL towards Sherston. All land parcels adjacent to the CNL are proposed to deliver habitat enhancement, informed by the CNL Management Plan and the Cotswolds National Landscape Strategy and Guidelines, to further the purposes of the designation. Details of the proposed landscape and ecological mitigation and enhancement measures are provided in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**, Figure 3-4-1 to 3-4-5.2 **Landscape and Ecology Mitigation Plan [APP-084] and** the

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				Outline Landscape and Ecological Management Plan (OLEMP) [APP-283], and the **Outline Ecological Protection and Mitigation Strategy (OEPMS) [APP-284]**. The preparation, approval and implementation of the detailed Landscape and Ecological Management Plan, substantially in accordance with the **OLEMP [APP-283]**, are secured through Requirement 7 in Schedule 2 of the **Draft Development Consent Order [APP-016]**. The preparation, approval and implementation of the detailed Ecological Protection and Mitigation Strategy, substantially in accordance with the **OEPMS [APP-284]**, are secured through Requirement 8 in Schedule 2 of the **Draft Development Consent Order [APP-016]**. These requirements ensure that the identified mitigation and enhancement measures are delivered and maintained throughout the lifetime of the Scheme.
WMHS-002	Soils and Agriculture	Food Security	The proposal would remove a vast area that could be used for agricultural reasons at a time where food security and local food are increasingly important. how can we back British farmers if we are openly taking their resources away from them?.	The effects of the Scheme on agricultural land, including land quality and productivity, are assessed in **ES Volume 1, Chapter 17: Soils and Agriculture [APP069]**, supported by **ES Volume 3, Appendix 171: Agricultural Land Classification and Soil Resource Survey Report [APP243]**. That assessment identifies that the majority of agricultural land affected is not Best and Most Versatile (BMV) land, comprising predominantly Subgrade 3b and Grade 4 land, which is not considered highquality agricultural land in planning terms. Governmentled agricultural initiatives, such as the Sustainable Farming Incentive which is relaunching later in 2026, have prioritised soil health, environmental enhancement and climate resilience, recognising that longterm food security is influenced by a range of factors beyond land take alone, including soil condition, climate change and environmental pressures. The Scheme allows soils to remain in situ and undisturbed during operation, supporting soil recovery and longterm land health,

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				with land reinstated and returned to agricultural use as far as practicable following decommissioning. No permanent loss of agricultural land is anticipated. The Applicant does not consider that food security will be compromised by the Scheme (or solar energy more widely). The latest figures to September 2024 indicate that solar occupied around 21,200 ha of agricultural land in the UK. In 2025, 545,000 ha of arable land in England were left uncropped (source: Department for Environment, Food & Rural Affairs, Agricultural land use in England at 1 June 2025). It should also be noted that food security is not identified as an issue within the suite of Energy National Policy Statements or the National Planning Policy Framework (NPPF). Further, the Government's UK Solar Roadmap (2025) states that solar development is not considered to compromise food security, but that the climate and nature crisis poses the greatest long-term risk to food security - a risk which the Scheme directly helps to address by providing a secure, low-carbon source of electricity. As set out in Section 2 of the **Outline Decommissioning Strategy [APP-279],** post-decommissioning of the Scheme, the landowners would choose how the land is to be used and managed. The landowner may return all of the land to arable use, although it is likely that established habitats such as hedgerows and woodland would be retained given their potential benefits to agricultural land and the wider farming estate.
WMHS-003	Soils and Agriculture	Rooftop Solar	There are far more better options in terms of location for solar panels such as brownfield land, rooftops of industrial estates, car parks etc. So many countries around the world have	The Applicant has addressed the use of agricultural land in the responses provided above. In relation to suggestions that brownfield land or alternative locations should be used, including rooftop, these matters are addressed in **ES Volume 1, Chapter 4: Alternatives and Design Evolution and in the**

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			already implemented this yet we are here voicing our concerns and forcing the government to follow these measures when really its a no brainer!.	**Statement of Need [APP-056 and APP-266]**. The Applicant has considered alternatives, including previously developed land and other forms of solar deployment, as part of the site selection and design evolution process. As shown in Table 2-2 of **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]**, the Applicant has considered previously developed land/brownfield land over 1 hectare within the area of search, based on the brownfield land registers of the relevant Local Planning Authorities, and concluded that none of the sites are large enough to provide a viable land parcel of at least 40 ha and sites were not considered to be available as they have planning permission for residential development and/or are allocated for residential/mixed use development. National policy and government guidance, as set out in the **Statement of Need [APP-266]**, recognise that while rooftop and smaller-scale solar installations are an important part of the energy mix, they cannot alone meet the scale of capacity required to achieve clean power and net zero objectives. Large-scale ground-mounted solar therefore remains necessary in addition to, not instead of, rooftop solar.
WMHS-004	Ecology and Biodiversity	Biodiversity and Ecosystems	The effect on bio diversity and local ecology would be detrimental due to the sheer scale of the development. it would disturb wildlife colonies, and a have a massive toll on ecosystems. AONB's are known to have legally protected habitats surely the disruption of these contradicts the national policy aim to enhance such areas?.	Potential impacts on ecology and biodiversity are fully assessed in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**. This assessment considers baseline ecological conditions and evaluates likely significant effects arising during the construction, operation and decommissioning phases of the Scheme. It identifies avoidance, mitigation and enhancement measures to address potential impacts on habitats and protected and notable species. It also identifies opportunities for ecological enhancement, including the creation and long-term management of habitats, and delivery of biodiversity net gain. The assessment concludes that, with the identified embedded and additional mitigation measures in place, no unacceptable significant adverse effects on ecology and biodiversity are

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				anticipated. The Applicant notes that the approach to the assessment in relation to ecology and biodiversity in general is under discussion with Wiltshire Council and Natural England and is set out in the relevant Statements of Common Ground to be submitted at Deadline 1. During construction, specific measures are proposed to avoid disturbance and displacement of wildlife. These include protective buffers around sensitive habitats and features, timing restrictions on vegetation clearance, pre-construction ecological surveys, species-specific mitigation, and pollution prevention controls which are set out in the **Outline Ecological Protection and Mitigation Strategy (EPMS) [APP-284]**. Measures to protect trees and hedgerows are also set out in **ES Volume 1, Chapter 10: Arboriculture [APP-062]**. The Scheme will also result in the cessation of intensive arable farming within the Solar PV Sites. As identified in **ES Volume 1, Chapter 9 [APP-061]**, this is expected to reduce the ongoing application of herbicides and pesticides, supporting improvements in habitat quality over the operational lifetime of the Scheme. The reversion of existing arable land within the Solar PV Sites to predominantly grassland habitats can be expected to benefit a wide range protected and notable species, as identified in **ES Volume 1, Chapter 9 [APP-061]**. Mitigation and enhancement measures are detailed in the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]** and the **Outline Ecological Protection and Mitigation Strategy (OEPMS) [APP-284]**, which set out habitat creation, species protection measures, buffer zones and long-term ecological management.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				The preparation, approval and implementation of the detailed Landscape and Ecological Management Plan, substantially in accordance with the **OLEMP [APP-283]**, are secured through Requirement 7 in Schedule 2 of the **Draft Development Consent Order [APP-016]**. The preparation, approval and implementation of the detailed Ecological Protection and Mitigation Strategy, substantially in accordance with the O**EPMS [APP-284]**, are secured through Requirement 8 in Schedule 2 of the **Draft Development Consent Order [APP-016]**. These requirements ensure that ecological protection and enhancement measures are delivered and maintained throughout construction and operation of the Scheme.
WMHS-005	Socio-Economics, Tourism and Recreation	Tourism	The development would risk harming tourism in the Cotswolds area which already so popular amongst people living this country and people visiting this country. Local residents, walkers visitors and businesses depend on the value of this area , industrialising it would have a massive impact on the local economy of the area. For these reasons I respectfully request that the Examining Authority refuse the Lime Down Solar Project.	The potential effects of the Scheme on tourism and recreation are assessed in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]**, supported by **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]**. The assessment considers baseline tourism activity, visitor attractions, recreational assets and tourism-dependent businesses within the study area. The assessment evaluates potential effects on the use, enjoyment and desirability of nearby tourism destinations, including impacts on individual visitor attractions, recreational routes, events and businesses reliant on tourism. It also considers whether changes to landscape character or visual amenity could influence visitor behaviour. The assessment identifies a worst-case scenario in which a temporary loss of up to 50 tourism-related jobs could occur locally during construction, and a long-term loss of up to 11 tourism-related jobs could occur during the operational phase of the Scheme. This represents a precautionary estimate based on conservative assumptions. The assessment concludes that, while some localised effects on tourism receptors are

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				anticipated to occur, significant adverse effects on the wider tourism economy are not anticipated. These findings are fully reported in the **ES Chapter 16 [APP-068]** and will be weighed in the planning balance alongside the Scheme's wider economic and environmental benefits. The Applicant is discussing the approach to assessment of tourism impacts with Wiltshire Council's Economic and Regeneration Team and those discussions will be set out in the Statement of Common Ground with Wiltshire Council to be submitted at Deadline 1.Statement of Common Ground with Wiltshire Council to be submitted at Deadline 1.
WMHS-006	Soils and Agriculture	Use of Farmland	I totally object to this project which is destroying valuable agricultural land. Use roofs, verges of motorway, verges of train tracks... Chippenham if full of vast industrial buildings, put solar panels on their roofs! We need food in this country, stop destroying valuable land with solar farm and housing estates. Think smart like other countries!!	An assessment of the potential effects of the Scheme on soils and agricultural land is provided in **ES Volume 1, Chapter 17: Soils and Agriculture [APP-069]**. This chapter considers baseline agricultural land quality, including Best and Most Versatile (BMV) land, and assesses likely significant effects arising from construction, operation and decommissioning of the Scheme, together with embedded mitigation measures. The areas of each Agricultural Land Classification (ALC) grade affected by the Scheme are set out in ES Chapter 17, Section 17.7. Of the agricultural land within the Solar PV Sites, approximately 477.4 hectares (around 67%) is classified as Subgrade 3b or Grade 4 and is therefore not BMV land. There is no Grade 1 land, around 30.8 hectares (approximately 4%) of Grade 2 land, and approximately 209.3 hectares (around 29%) of Subgrade 3a land. The distribution of ALC grades is shown in **ES Volume 2, Figure 17-2: Agricultural Land Classification Mapping [APP-172]**. The Applicant has had regard to agricultural land quality in the design and site selection process and has sought, where practicable, to locate infrastructure on lower quality land.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				The Scheme will result in a temporary but long-term and reversible loss of agricultural land for the operational life of the Scheme. As set out in ES Chapter 17, Section 17.10, this gives rise to a temporary, long-term moderate adverse effect on agricultural land overall, and a temporary, long-term major/moderate adverse effect on BMV land, both of which are assessed as significant. These effects are fully reported in the ES and are a matter for the Secretary of State to weigh in the planning balance against the need for the Scheme and its wider benefits. There are no significant permanent effects on agricultural land, as all land will be returned to its original use and condition as far as practicable following decommissioning. The Applicant notes that the approach to assessing the quality of the agricultural land is under further discussion with Natural England and is set out in the relevant Statement of Common Ground to be submitted at Deadline 1. Measures to avoid and minimise effects on soils and agricultural land are embedded within the Scheme design and secured through the DCO. These include the preparation and implementation of a **Soil Resources Management Plan (SRMP) [APP-280]**, which will control soil handling, storage and reinstatement during construction, operation and decommissioning, and a requirement to prepare and implement a Decommissioning Strategy in accordance with the **Outline Decommissioning Strategy [APP-279]**. Through the establishment and maintenance of long-term grassland beneath and between the solar arrays, soil health, quality and structure are anticipated to improve over the lifetime of the Scheme, resulting in a temporary, moderate beneficial effect on soil resources at decommissioning, which is assessed as significant (ES Chapter 17, Sections 17.10 and 17.12).

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				In relation to suggestions that brownfield land or alternative locations should be used, including rooftop, these matters are addressed in **ES Volume 1, Chapter 4: Alternatives and Design Evolution and in the Statement of Need [APP-056 and APP-266]**. The Applicant has considered alternatives, including previously developed land and other forms of solar deployment, as part of the site selection and design evolution process. As shown in Table 2-2 of **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]**, the Applicant has considered previously developed land/brownfield land over 1 hectare within the area of search, based on the brownfield land registers of the relevant Local Planning Authorities, and concluded that none of the sites are large enough to provide a viable land parcel of at least 40 ha and sites were not considered to be available as they have planning permission for residential development and/or are allocated for residential/mixed use development. National policy and government guidance, as set out in the **Statement of Need [APP-266]**, recognise that while rooftop and smaller-scale solar installations are an important part of the energy mix, they cannot alone meet the scale of capacity required to achieve clean power and net zero objectives. Large-scale ground-mounted solar therefore remains necessary in addition to, not instead of, rooftop solar.

4.42 Grittleton Tennis Club

Table 4-42 RR-1744

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
GTC-001	Socio-Economics, Tourism and Recreation	Recreational Facilities	I am the Chairman of Grittleton tennis club and on behalf of its members strongly object to this scheme. The club was formed in 1995 and celebrated its 30th anniversary this year. The club has 36 members who are from the surrounding area and has been able to exist on the kind provision of courts at Grittleton House, Church House and The Village Hall MUGA. The club provides a fantastic opportunity for beginners and improvers at its weekly social tennis evenings and more competitive competition to the best players as part of a mixed league team in the Wiltshire area. Parking for tennis is in the small residential street in Grittleton, access between the courts is provided by walking between the properties in The Street, Grittleton and the games are generallly played at a time that would coincide with construction hours for the scheme. The benefit and appeal to most members and visitors alike, is the friendly and peaceful setting around a village of listed buildings, all of which,including The Street itself, sit within Grittleton Conservation Area	The likely effects on recreational facilities have been assessed in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** and the supporting **ES Volume 3 Appendix 16-2 Tourism and Recreation Receptor Tables [APP-241].** Grittleton Tennis Club has identified that it uses the tennis courts at Grittleton Village Hall, which has been included as part of the assessment of the facilities for the Grittleton Cricket Club. The Applicant has identified a temporary medium-term moderate-minor adverse effect to the sports facilities at Grittleton Cricket Club (which includes the tennis courts) due to the proximity of the proposed cable route construction compound, and the use of The Street for HGV movements during construction. These effects are subject to mitigation measures to minimise effects from construction movements in this area, as secured through the **OCTMP [APP-287]** by Requirement 15 in Schedule 2 to the **Draft DCO [APP-016]**. This includes limitations on HGV movement times to 09:30-16:30 on weekdays and 09:30-13:00 on Saturdays, to ensure HGV movements do not coincide with morning and evening peaks. The Street is not part of the construction route so the club won't be affected directly by construction traffic however, delays and the potential effects of construction traffic on the local highway network are assessed in **ES Volume 1, Chapter 13: Transport and Access [APP-065]**, which considers construction vehicle movements, traffic volumes, road safety and effects on road users. This included the capacity of local roads and infrastructure to accommodate construction vehicles with consideration of construction traffic volumes, vehicle types, route suitability, and network performance.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			and the Cotswolds National Landscape. The proposed scheme puts this club at risk of closure unnecessarily, all because the land identified for the solar panels is devoid of a grid connection. The requirement to devastate 22km of peaceful open countryside, used in this countries food production, all for a distant connection is a madness that will threaten peoples livelyhood, their safety, their education, their opportunites and their wellbeing. We are only one club, of which there must be hundreds, that are at risk from this scheme. As a nation, we should all be aware of the effect mental health has on the population and the crucial part played by clubs like ours. The issues created by this scheme that effect our club centre on the proposal to utilise small unclassified country and village roads and streets for the construction, in the case of Grittleton, those that form part of the Grittleton Conservation Area and the Cotswolds National Landscape.	The assessment concludes that the level of construction traffic associated with the Scheme is unlikely to materially affect road safety on links within the Study Area, and no significant adverse effects on accident risk are anticipated. The assessment concludes that with appropriate mitigation in place, there would be no significant adverse impacts on the local highway network during the construction, operation and maintenance, and decommissioning phases of the Scheme. An **OCTMP [APP-287]** supports the DCO Application and presents outline measures which restrict construction deliveries to the proposed construction routes and separates the public and recreational users from hazards, including, traffic management measures such as signage and banksmen, fencing, and dust and noise control. With regards to the Scheme's grid connection, the Applicant confirms that the existing National Grid Melksham substation has been identified as the point of connection. This decision was based on available capacity, network resilience, and strategic grid planning. As explained in **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]**, an initial search area was identified at a 5 km radius from the POC, however this was later expanded as no suitable and available sites within 5 km were identified. The search area was enlarged incrementally to a 20 km radius which is considered by the Applicant to be a viable cable connection distance for a solar project of this scale. The POC and 20 km search area is shown on Figure 1, Annex C of **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]**, Further, from an operational perspective, high voltage electricity transmission at 400kV in this case, is specifically designed to

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				minimise energy losses over long distances. As such, the approximate 20km distance involved results in negligible losses. More details on how the Cable Route Corridor has been located and designed can be found in **ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP-056]**. Several factors were considered such as taking as direct a route as possible, whilst following existing features, such as roads; and avoiding sensitive receptors as far as practicable, such as habitat designations, residential and commercial properties, heritage assets, and a large number of land interests. The assessments set out in the various chapters of the **ES [APP-052 to APP-265]** detail what impacts are expected as a result of the Scheme based on the minimum and maximum parameters of the Scheme, and the mitigation and enhancement measures that are proposed to reduce these impacts. With regard to mental health, impacts on mental health and wellbeing are assessed in **ES Volume 1, Chapter 18: Human Health [APP-070]**. This chapter provides a comprehensive assessment of the Scheme's potential effects on human health, including mental health and wellbeing, through consideration of a broad range of health determinants. These include access to open space and recreation, transport and connectivity, community identity and cohesion, employment and income, noise and vibration, air quality, and access to health and social care services. The assessment applies a health *"lens"* to the findings of relevant technical chapters and concludes that, with embedded mitigation and additional measures secured, the Scheme would not give rise to significant adverse effects on population health, including mental health and wellbeing.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				The assessment focuses on communities within a 2 km Study Area surrounding the Scheme, identified as those most likely to experience potential health-related effects. Baseline analysis demonstrates that rates of poor mental health within the Study Area are generally lower than national averages, and the assessment considers potential pathways by which the Scheme could influence mental wellbeing, including changes to environment, amenity, access and community factors. Residual effects following mitigation are assessed as not significant at any phase of the Scheme. Consultation with Wiltshire Council's Public Health Team has informed the approach to mental health considerations, as documented in **ES Volume 3, Appendix 18-1: Human Health Consultation [APP-244]**. Through this engagement, the Applicant has committed to signposting locally available mental health and wellbeing resources to members of the public engaging with the Scheme, using information provided by Wiltshire Council's Public Health Team. The Applicant will continue to monitor consultation responses relating to mental health and will provide appropriate signposting to existing local support services where requested. The Applicant notes that the assessment methodology for health and wellbeing has been agreed with Wiltshire Council's Public Health team and is set out in the Statement of Common Ground with Wiltshire Council to be submitted at Deadline 1. With regard to the Grittleton Conservation Area, **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, supported by **Appendix 12.1: Heritage Statement [APP-219]**, has assessed the potential impact of the scheme on Grittleton Conservation Area. The cable route corridor is proposed to pass to the east of Grittleton Conservation Area (Fields F107-F114). While the Scheme will comprise temporary and localised construction activity as part of the installation of cabling, the assessment

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				identified that will be no impact to the character and appearance of Grittleton Conservation Area. Since the design presented at PEIR stage, Field C26, the westernmost part of Field C25, and the majority of Field C13 have been entirely removed from the Order Limits. Solar PV Panels have also been removed entirely from within Fields B1-B5, C24-C25, and C13. A number of fields abutting the Fosse Way within which Solar PV Panels will be erected have had offsets established with their boundaries with Fosse Way, including Fields B6, C10-C12, and C22-C23. **Appendix 12.1: Heritage Statement [APP-219]** identified that the overall setting and significance of the Fosse Way will remain intact, and the asset will retain its legibility as a roadway within a largely agrarian landscape. Consequently, no significant effects were identified to the asset. With regard to the Cotswolds National Landscape, the CNL is fully assessed as a standalone receptor within **ES Volume 3, Appendix 8.6: Assessment of Effects on the Special Qualities of the Cotswolds National Landscape [APP-197]**. This assessment considers the effects of the Scheme on landscape character, visual amenity and the special qualities of the CNL, including tranquillity. The Scheme was refined through an iterative design process to avoid and reduce effects on the CNL and its setting. Panels along the edge of the CNL were removed from the Order Limits in fields C2, C3 and C4 where significant visual effects on receptors within the CNL were identified. Panels were also removed from fields C1, C6, C8, the western section of C9 and the majority of C10, with this land now proposed for ecological mitigation to protect the setting of the CNL. In addition, panels within fields A11 and A12 were removed and the land repurposed for ecological mitigation to protect the setting of the CNL towards Sherston.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				All land parcels adjacent to the CNL are proposed to deliver habitat enhancement, as shown in the **Works Plans [APP-007]**, informed by the CNL Management Plan and the Cotswolds National Landscape Strategy and Guidelines, to further the purposes of the designation. Details of the proposed landscape and ecological mitigation and enhancement measures are provided in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**, Figure 3-4-1 to 3-4-5.2 **Landscape and Ecology Mitigation Plan [APP-084]** and the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]**, and the **Outline Ecological Protection and Mitigation Strategy (EPMS) [APP-284]**. The preparation, approval and implementation of the detailed Landscape and Ecological Management Plan, substantially in accordance with the **OLEMP [APP-283]**, are secured through Requirement 7 in Schedule 2 of the **Draft Development Consent Order [APP-016]**. The preparation, approval and implementation of the detailed Ecological Protection and Mitigation Strategy, substantially in accordance with the **EPMS [APP-284]**, are secured through Requirement 8 in Schedule 2 of the **Draft Development Consent Order [APP-016]**. These requirements ensure that the identified mitigation and enhancement measures are delivered and maintained throughout the lifetime of the Scheme. The effects of the Scheme on agricultural land, including land quality and productivity, are assessed in **ES Volume 1, Chapter 17: Soils and Agriculture [APP069]**, supported by **ES Volume 3, Appendix 171: Agricultural Land Classification and Soil Resource Survey Report [APP243]**. That assessment identifies that the majority of agricultural land affected is not Best and Most Versatile (BMV) land, comprising predominantly Subgrade 3b and Grade 4 land,

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				which is not considered highquality agricultural land in planning terms. Governmentled agricultural initiatives, such as the Sustainable Farming Incentive which is relaunching later in 2026, have prioritised soil health, environmental enhancement and climate resilience, recognising that longterm food security is influenced by a range of factors beyond land take alone, including soil condition, climate change and environmental pressures. The Scheme allows soils to remain in situ and undisturbed during operation, supporting soil recovery and longterm land health, with land reinstated and returned to agricultural use as far as practicable following decommissioning. No permanent loss of agricultural land is anticipated. The Applicant does not consider that food security will be compromised by the Scheme (or solar energy more widely). The latest figures to September 2024 indicate that solar occupied around 21,200 ha of agricultural land in the UK. In 2025, 545,000 ha of arable land in England were left uncropped (source: Department for Environment, Food & Rural Affairs, Agricultural land use in England at 1 June 2025). It should also be noted that food security is not identified as an issue within the suite of Energy National Policy Statements or the National Planning Policy Framework (NPPF). Further, the Government's UK Solar Roadmap (2025) states that solar development is not considered to compromise food security, but that the climate and nature crisis poses the greatest long-term risk to food security - a risk which the Scheme directly helps to address by providing a secure, low-carbon source of electricity. As set out in Section 2 of the **Outline Decommissioning Strategy [APP-279],** post-decommissioning of the Scheme, the

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				landowners would choose how the land is to be used and managed. The landowner may return all of the land to arable use, although it is likely that established habitats such as hedgerows and woodland would be retained given their potential benefits to agricultural land and the wider farming estate.
GTC-002	Socio-Economics, Tourism and Recreation	Impact on Business	The direct issues which could cause the closure of our long established club are as follows:- Threat to the business of SME's that could be lost and no longer provide our facilities. Necessity to close on safety grounds as access between the courts could no longer be deemed safe. Access to and between our facilities being closed or obstructed. Members leaving as the whole peaceful appeal of the club is lost. League teams being unwilling to travel to our club because of safety issues. League barring our team on the grounds of safety using our facilities. No scheme should be allowed to be the cause of so much needless destruction to peoples lives and mental health all because profit to overseas investors is put above national food security. PLEASE REJECT	The assessment of traffic movement on The Street, Grittleton associated with the Scheme is set out in **ES Volume 1, Chapter 13: Transport and Access [APP-065]**, identifying no greater than a minor adverse effect to road and non-motorised users of The Street, Grittleton during construction. The assessment identifies that on a peak day, the Scheme is likely to increase HGV movements on this road by 16 (8 in each direction) and cars and vans movements by 56 (28 in each direction) over the course of the day. This is not anticipated to create any significant effect on road safety for any type of user, and is therefore not anticipated to affect the safety of tennis club member accessing any of the tennis courts in Grittleton. The likely effect to the recreational use of sports facilities in Grittleton (based on the assessment of the Grittleton Cricket Club and the tennis court located there in **ES Volume 3 Appendix 16-2 Tourism and Recreation Receptor Tables [APP-241]**) is anticipated to be impacted predominantly as a result of amenity and thus its desirability for use, far more so than physical barriers to accessing the facilities. Although considered over a wider geographic area than just Grittleton, it is anticipated the Scheme will have no more than a minor adverse effect (which is not significant) to health and wellbeing as a result of impacts to open space, leisure and play, including recreational sports (see **ES Volume 1, Chapter 18: Human Health [APP-070]**). These impacts are also anticipated to be temporary and medium-term as no ongoing impacts from the

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				Scheme are anticipated in Grittleton village once the Cable Route Corridor has been constructed. The effects of the Scheme on agricultural land, including land quality and productivity, are assessed in **ES Volume 1, Chapter 17: Soils and Agriculture [APP069]**, supported by **ES Volume 3, Appendix 171: Agricultural Land Classification and Soil Resource Survey Report [APP243]**. That assessment identifies that the majority of agricultural land affected is not Best and Most Versatile (BMV) land, comprising predominantly Subgrade 3b and Grade 4 land, which is not considered highquality agricultural land in planning terms. Governmentled agricultural initiatives, such as the Sustainable Farming Incentive which is relaunching later in 2026, have prioritised soil health, environmental enhancement and climate resilience, recognising that longterm food security is influenced by a range of factors beyond land take alone, including soil condition, climate change and environmental pressures. The Scheme allows soils to remain in situ and undisturbed during operation, supporting soil recovery and longterm land health, with land reinstated and returned to agricultural use as far as practicable following decommissioning. No permanent loss of agricultural land is anticipated. The Applicant does not consider that food security will be compromised by the Scheme (or solar energy more widely). The latest figures to September 2024 indicate that solar occupied around 21,200 ha of agricultural land in the UK. In 2025, 545,000 ha of arable land in England were left uncropped (source: Department for Environment, Food & Rural Affairs, Agricultural land use in England at 1 June 2025). It should also be noted that food security is not identified as an issue within

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				the suite of Energy National Policy Statements or the National Planning Policy Framework (NPPF). Further, the Government's UK Solar Roadmap (2025) states that solar development is not considered to compromise food security, but that the climate and nature crisis poses the greatest long-term risk to food security - a risk which the Scheme directly helps to address by providing a secure, low-carbon source of electricity. As set out in Section 2 of the **Outline Decommissioning Strategy [APP-279],** post-decommissioning of the Scheme, the landowners would choose how the land is to be used and managed. The landowner may return all of the land to arable use, although it is likely that established habitats such as hedgerows and woodland would be retained given their potential benefits to agricultural land and the wider farming estate.

4.43 Practical Car and Van Rental

Table 4-43 RR-3841

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
PCVR-001	Socio-Economics, Tourism and Recreation	Impact on Business	this will have a negative impact on our business as any members of the public needing to rent a car or van in the Malmesbury to Hullavington area and further afield will not be able to without having to endure construction traffic so will put them off. we also doe lots of deliveries to the Cotswolds and Gloucester, the route we usually take is 24 miles. this will extend that to well over 50 miles increasing our CO2 output exponentially. we will lose out as we can only charge per mile on the shortest route. this will have a dramatic negative impact on our business.	The Applicant has assessed likely impacts to the highway network as a result of construction traffic generated by the Scheme in **ES Volume 1 Chapter 13: Transport and Access [APP-065]**. This identifies no significant adverse effects to driver delay or driver safety as a result of the Scheme. Road closures to facilitate cable crossing works will be minimised in duration, or avoided through the utilisation of trenchless techniques (such as Horizontal directional drilling) for major road crossings. As a result, the Applicant considered that indirect impacts on a car and van hire business are likely to be minimal, and do not materially change connectivity for deliveries between Chippenham (Practical Car & Van Hire location) and the Cotswolds or its other outlet location in Gloucester.
PCVR-002	Ecology and Biodiversity	Wildlife and Habitats	this will also have a negative impact on the local wildlife, there are lots of the successfully re-introduced Red Kite. this will cause loss of habitat and food / prey items for them to continue thriving.	Potential impacts of the Scheme on ecology and biodiversity are assessed in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**, which considers baseline conditions and evaluates likely effects during construction, operation and decommissioning. The assessment identifies embedded and additional mitigation measures and concludes that, with these measures in place, no unacceptable significant adverse effects on ecology and biodiversity are anticipated. Although red kites are primarily scavengers, within the Solar PV Sites, the cessation of intensive agricultural land use and reversion of the land to low-input grasslands would likely result in an increase in abundance of small mammals such as mice, voles and shrews which form a key part of the diet of red kites.

4.44 M4 Property Solutions Limited

Table 4-44 RR-2917

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
MPSL-001	Description and DCO Process		We strongly object and urge the inspectorate to reject the proposal before it goes any further.	The Applicant is confident that the proposed management and mitigation measures set out in the **ES [APP-052 to APP-265]** are comprehensive and robust and that the Scheme aligns with national and local planning policy; this is outlined in the **Planning Statement [APP-267]**. Of particular relevance are Annex A: National Policy Statement Accordance Tables and Annex B: Local Policy Accordance Tables, of the Planning Statement which set out an appraisal of the Scheme against the policies.
MPSL-002	Description and DCO Process	Developer	We abhor the [REDACTED] behaviour of the developer in writing to 45 local objectors offering them financial incentive to withdraw their objections. On this ground alone the proposal should be rejected. This behaviour might be expected in other less developed countries but must surely be absolutely rejected in the UK in 2025.	The correspondence referred to related to proposed voluntary heads of terms agreements. Such agreements are entirely voluntary and landowners are under no obligation to enter into them. They are standard practice on nationally significant infrastructure projects and provide a transparent mechanism for agreeing matters such as access, mitigation or accommodation works where relevant. Entering into, or declining to enter into, a voluntary agreement does not affect any individual's right to make representations to the Planning Inspectorate or to maintain an objection to the Scheme. Any recipient of correspondence was free to object to the project and to participate fully in the Examination process irrespective of whether they wished to engage in discussions regarding heads of terms.
MPSL-003	Other Environmental Matters	Glint and Glare	The use of consultants to carry out flawed research based on out-dated and inaccurate software, and to publish findings about potential Glint and Glare is an aspect of the proposal which should be challenged. The glint and glare from this proposed 650,000 panel site over thousands of acres of Cotswolds AONB under Western flight paths (and Bristol airport approach flight	The **ES [APP-052 to APP-265]** and the environmental surveys have been undertaken by competent experts with considerable experience assessing similar schemes. Details of qualifications, experience and professional institute membership are provided within **ES Volume 3, Appendix 1-1 Statement of Competence [APP-180]**. An assessment of glint and glare effects arising from the Scheme is provided in **ES Volume 1, Chapter 20: Other Environmental Matters [APP-072],** Section 20.5: Glint and Glare. The assessment considers potential effects on

			path) will seriously affect those local properties with West facing gardens, together with nesting and migrating birds	surrounding receptors, including road and rail users, residential properties, public rights of way, aerodromes and sensitive viewpoints within the Cotswolds National Landscape. The assessment concludes that, with embedded mitigation measures, including the use of fixed-tilt panels at a maximum height of 2.5 metres where required, no significant glint or glare effects are predicted to occur as a result of the Scheme. There is no evidence that nesting and migrating birds are significantly affected by glint and glare, and this is not a consideration within the Glint and Glare Assessment.
MPSL-004	Socio-Economics, Tourism and Recreation Transport and Access	Impact of Traffic on Business	The serious negative effect on local businesses and communities is currently completely ignored but will be significant, based on traffic and disturbance assessments alone. This should be examined by the assessment panel and challenged.	The potential effects of construction traffic on the local highway network are assessed in **ES Volume 1, Chapter 13: Transport and Access [APP-065]**, which considers construction vehicle movements, traffic volumes, road safety and effects on road users. This included the capacity of local roads and infrastructure to accommodate construction vehicles with consideration of construction traffic volumes, vehicle types, route suitability, and network performance. The assessment concludes that the level of construction traffic associated with the Scheme is unlikely to materially affect road safety on links within the Study Area, and no significant adverse effects on accident risk are anticipated. The assessment concludes that with appropriate mitigation in place, there would be no significant adverse impacts on the local highway network during the construction, operation and maintenance, and decommissioning phases of the Scheme. Construction vehicle movements will be managed through a Construction Traffic Management Plan. An **Outline Construction Traffic Management Plan (CTMP) [APP-287]** has been prepared and submitted with the DCO application. The aim of the CTMP is to ensure that the effect of the

				construction phase on the local highway network is minimised. The **Outline CTMP [APP-287]** sets out measures to coordinate construction deliveries by HGVs to arrive and depart between 09:30 and 16:30 where possible, to avoid peak network hours of 08:00–09:00 and 17:00–18:00. It also includes a community liaison element to keep local communities informed about the construction process and to provide a contact for feedback should any issues arise. Compliance with the CTMP will be monitored by the Developer, Contractor and Wiltshire Council as local highway authority. The preparation, approval and implementation of the final CTMP, substantially in accordance with the outline CTMP, are secured through Requirement 15 of Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring construction traffic impacts are appropriately managed throughout the construction phase of the Scheme. An assessment of the likely effects of the Scheme on the local economy and employment is provided in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]**. This chapter considers potential impacts on construction and engineering sectors, agricultural activity, tourism-related businesses, and wider local economic conditions during construction, operation and decommissioning. Supporting evidence is provided in **ES Volume 3, Appendix 16-3: Socio-Economics, Tourism and Recreation – Summary of Non-Significant Effects [APP-242]**, which summarises that effects on the local economy and economic prosperity are assessed as negligible to minor beneficial, with construction expenditure and employment generation contributing positive, temporary effects on local economic activity.

				The assessment therefore concludes that the Scheme would not result in significant adverse effects on local businesses or the wider local economy, and that socio-economic benefits, including job creation and local supply-chain opportunities, are expected during the construction phase, with more modest economic and skills and supply chain opportunities during the operational phase. The Applicant notes that the approach to assessment of socio-economic effects has been agreed with Wiltshire Council's Economic and Regeneration Team, with the exception of matters relating to agricultural employment, which the Applicant is still discussing with the Team. This is set out in the Statement of Common Ground with Wiltshire Council to be submitted at Deadline 1.

4.45 Pewsey Community Area Partnership

Table 4-45 RR-3773

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
PCAP-001	Cumulative and In-Combination Effects	Scheme Scale and Size in Combination with Other Solar Project in Vicinity	This project is far too large and invasive in a county already inundated with other solar projects.	The Scheme has been designed to deliver the greatest possible benefit from the available land and the available grid connection, whilst avoiding, minimising and/or mitigating harmful environmental effects. The total area within the DCO Order Limits encompasses approximately 1,237 hectares (ha). Of this, the 'Solar PV Sites' comprise approximately 749.1 ha of land. Around 479.5 ha of this land is proposed as being required for installation of solar PV, battery storage, and associated infrastructure. The remaining 269.5 ha would provide areas dedicated to ecological mitigation, measurable Biodiversity Net Gain (BNG) delivery, landscaping, offsets and agricultural land managed for environmental enhancement and habitat creation. The Applicant remains committed to delivering a Scheme that makes a meaningful contribution to the UK's transition to net zero, while also seeking to minimise adverse impacts and maximise opportunities for environmental enhancement and community benefits. Cumulative effects with other projects has been carefully considered as part of the Scheme with other projects, both existing and proposed, taken into account. In terms of the Lime Down project, a comprehensive Cumulative and In-Combination Effects Assessment has been undertaken in accordance with Planning Inspectorate Advice Note 17 and the relevant NPS EN-1, NPS EN-3 and NPS EN-5 requirements which are set out within **ES Volume 1, Chapter 21: Cumulative and In-Combination Effects [APP-074]** and associated Appendices **[APP-264].** Interaction with proposed or consented but not yet built developments has been fully explored within each of the technical assessments **[APP-059 - APP-072]** with a

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				summary of each of these assessments provided within **ES Volume 1, Chapter 21 Cumulative and In-Combination Effects [APP-073].** Existing schemes are captured within the baseline environment. The four-stage cumulative assessment methodology is described within **ES Chapter 6 EIA Methodology [APP-058].** 358 developments were included in the Long List **[APP-264].** 41 developments are included in the short list (and are therefore assessed) including a number of proposed solar and BESS developments. The list of developments included in the cumulative assessment was reviewed and developed in consultation with Wiltshire Council. Table 21-8 within **ES Volume 1, Chapter 21 Cumulative and In-Combination Effects [APP-073] identifies that,** taking a conservative worse case approach, significant cumulative effects with the short list of developments are identified at a limited and discrete number of receptors comprising tourism and recreation impacts during the construction phase on Corsham Park, PRoW WT|CORM|122, long path and Sustrans Cycle Route 403, and on skylark at a District level. Skylark-specific mitigation and habitat enhancement measures are incorporated into the Scheme design to reduce effects on skylark as far as practicable and are described in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061].** These include the provision of suitably large, open set-aside and grassland habitats designed to provide suitable skylark breeding and foraging conditions. These measures are illustrated in **ES Volume 2, Figure 3-4: Landscape and Ecological Mitigation Plan [APP-084]** and detailed in the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]**. Such measures have been

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				designed to reduce the anticipated residual effects resulting from the Scheme to a Local level of geographic importance.
PCAP-002	Soils and Agriculture	Use of Farmland	Land for animals and arable etc needs to be prioritised if climate changes impact on farming is to be managed to feed the uk population. Solar should be installed on all new buildings , over carparks, giving shade to vehicles and power for those electric chargers that will be needed.	The effects of the Scheme on agricultural land, including land quality and productivity, are assessed in **ES Volume 1, Chapter 17: Soils and Agriculture [APP069]**, supported by **ES Volume 3, Appendix 171: Agricultural Land Classification and Soil Resource Survey Report [APP243]**. That assessment identifies that the majority of agricultural land affected is not Best and Most Versatile (BMV) land, comprising predominantly Subgrade 3b and Grade 4 land, which is not considered highquality agricultural land in planning terms. Governmentled agricultural initiatives, such as the Sustainable Farming Incentive which is relaunching later in 2026, have prioritised soil health, environmental enhancement and climate resilience, recognising that longterm food security is influenced by a range of factors beyond land take alone, including soil condition, climate change and environmental pressures. The Scheme allows soils to remain in situ and undisturbed during operation, supporting soil recovery and longterm land health, with land reinstated and returned to agricultural use as far as practicable following decommissioning. No permanent loss of agricultural land is anticipated. The Applicant does not consider that food security will be compromised by the Scheme (or solar energy more widely). The latest figures to September 2024 indicate that solar occupied around 21,200 ha of agricultural land in the UK. In 2025, 545,000 ha of arable land in England were left uncropped (source: Department for Environment, Food & Rural Affairs, Agricultural land use in England at 1 June 2025). It should also be noted that food security is not identified as an issue within the suite of Energy National Policy Statements or the National Planning Policy Framework (NPPF). Further, the Government's UK Solar Roadmap (2025) states that solar development is not considered to compromise food

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				security, but that the climate and nature crisis poses the greatest long-term risk to food security - a risk which the Scheme directly helps to address by providing a secure, low-carbon source of electricity. As set out in Section 2 of the **Outline Decommissioning Strategy [APP-279],** post-decommissioning of the Scheme, the landowners would choose how the land is to be used and managed. The landowner may return all of the land to arable use, although it is likely that established habitats such as hedgerows and woodland would be retained given their potential benefits to agricultural land and the wider farming estate. In relation to suggestions that brownfield land or alternative locations should be used, including rooftop, these matters are addressed in **ES Volume 1, Chapter 4: Alternatives and Design Evolution and in the Statement of Need [APP-056 and APP-266]**. The Applicant has considered alternatives, including previously developed land and other forms of solar deployment, as part of the site selection and design evolution process. As shown in Table 2-2 of **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]**, the Applicant has considered previously developed land/brownfield land over 1 hectare within the area of search, based on the brownfield land registers of the relevant Local Planning Authorities, and concluded that none of the sites are large enough to provide a viable land parcel of at least 40 ha and sites were not considered to be available as they have planning permission for residential development and/or are allocated for residential/mixed use development. National policy and government guidance, as set out in the **Statement of Need [APP-266]**, recognise that while rooftop and smaller-scale solar installations are an important part of the energy mix, they cannot alone meet the scale of capacity required to achieve clean power and net zero objectives. Large-

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				scale ground-mounted solar therefore remains necessary in addition to, not instead of, rooftop solar.
PCAP-003	Description and DCO Process	Motivation	This is profit over practicalities at its worst.	The Applicant notes the concerns about the reasons behind the Scheme. The Scheme aims to help meet national targets for clean energy and net zero targets set out in legislation and policy. The aim is to deliver long term environmental benefit alongside a secure energy supply. The **ES [APP-052 to APP-265]**, **Statement of Need [APP-266]**, and **Planning Statement [APP-267]** provide an assessment of the adverse and beneficial effects associated with the Scheme, an explanation of why the Scheme is needed and the benefits of solar energy generation, and the other benefits proposed by the Scheme. The Applicant is committed to meeting all planning, environmental, and construction policies and standards. The Scheme is being developed in line with legal and regulatory requirements, with engagement with all statutory and non-statutory bodies, ensuring quality and accountability throughout.

4.46 Clubs4Kids Ltd

Table 4-46 RR-0915

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
C4KL-001	Description and DCO Process	Objection	I wish to register my strong objection to the Lime Down Solar Park application.	The Applicant notes this comment but is confident that the proposed management and mitigation measures set out in the **ES [APP-052 to APP-265]** are comprehensive and robust and that the Scheme aligns with national and local planning policy; this is outlined in the **Planning Statement [APP-267]**. Of particular relevance are Annex A: National Policy Statement Accordance Tables and Annex B: Local Policy Accordance Tables, of the Planning Statement which set out an appraisal of the Scheme against the policies.
C4KL-002	Transport and Access	Highway Safety	As a teacher who runs French clubs in primary schools across Sherston, Luckington, Hawkesbury Upton, Tetbury, Acton Turville, and Lea, the construction phase poses a direct and severe threat to my livelihood, my safety on the road, and my health.	The Applicant has sought to minimise impacts upon neighbouring properties and amenity through the mitigation measures secured by requirements in Schedule 2 to the **Draft DCO [APP-016]**. The Applicant has responded to the individual points raised below, including regarding impacts on businesses, road safety and human health.
C4KL-003	Transport and Access	Traffic Impact	My key objections are: My Business Will Suffer: My entire livelihood depends on being able to drive reliably between schools throughout the day. The plan to put hundreds more HGVs on my essential routes, like the Fosse Way, will cause major delays. If I'm late, I have to refund the schools, which directly costs me money and damages the professional reputation I've worked hard to build.	The Applicant has assessed the likely impacts of construction traffic movements on the local highway network in **ES Volume 1 Chapter 13: Transport and Access [APP-065]** and finds there are no significant adverse effects to driver delay or highway safety, subject to implementation of mitigation measures in the **OCTMP [APP-287]**, secured by Requirement 15 in Schedule 2 to the **Draft DCO [APP-016]**. As no significant effects to travelling on the local highway network is anticipated, no subsequent significant effect on business users of the highway network is expected. Furthermore, proposed HGV construction routes have been presented at **ES Volume 2, Figures 13-11 and 13-12 [APP-156 and APP-157]**. These show the routes HGVs are proposed to be limited to during construction, as secured through the **OCTMP [APP-287]** by Requirement 15 in Schedule 2 to the **Draft DCO [APP-016]**. As these routes are to be fixed ahead of construction, the Applicant is confident that this allows local

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				residents and business travellers to be able to confidently understand which routes are affected, and how they can adapt routing plans as required.
C4KL-004	Transport and Access	Highway Safety	The Roads Will Become Unsafe: I am deeply worried about having to share our narrow, single-track lanes with a constant stream of massive construction lorries. As someone who drives these roads regularly every day to get to my schools, this is an unacceptable safety risk, especially on routes like the B4040 which already has a history of serious accidents.	The proposed construction routes have been carefully assessed and are considered to be the most appropriate routes to the Scheme. Construction traffic would also be temporary and controlled through measures in a **CTMP [APP-166]**to minimise adverse impacts on the highway network. The B4040 is a B-road which has an intended purpose is to feed traffic between A roads and smaller roads on the network. It is therefore designed to accommodate all type of vehicles, including HGVs.
C4KL-005	Human Health	Impacts to Health	My Health Will Be Affected: I suffer from (Redacted). The constant, loud noise from this construction traffic over two years will severely worsen my condition, leading to permanent headaches and stress. This will impact my ability to concentrate on driving safely and to be the energetic, focused teacher the children deserve.	The Applicant has assessed the residential address associated with this business, and has engaged with the residential homeowners during pre-submission consultation stages to try to reduce construction impacts on the property's inhabitants. The assessment of construction noise impacts in **ES Volume 1 Chapter 14: Noise and Vibration [APP-066]** demonstrates that estimated construction noise levels at this property are between the LOAEL and SOAEL, indicating that while an adverse effect is likely to be experienced, it is not anticipated to be significant. This assessment outcome has been directly translated to assumptions on the likely effects to human health as a result of noise and vibration in **ES Volume 1 Chapter 18: Human Health [APP-070]**. While it is considered likely that the construction of the Scheme will have up to a moderate-minor adverse effect on this receptor, this is expected to be a medium-term temporary effect, and therefore is not a significant, nor long-term effect.
C4KL-006	Transport and Access	Traffic Flow and Mitigation	The Promises Aren't Good Enough: The developer's traffic report seems to ignore the reality of my daily life. Dismissing a 500% increase in lorries because the starting number is "*low"* is	It is notable that on roads where baseline traffic flows are very low, any increase in traffic flow may result in a predicted increase that would be high. Therefore, in accordance with IEMA guidance Environmental Assessment of Traffic and Movement paragraph 3.16, it is important to consider any

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			completely unrealistic. Their plans to manage this chaos are just promises on paper, with no real guarantee they will protect people like me.	overall increase in road traffic in relation to the capacity of the road and its temporary nature. **ES Volume 1, Chapter 13: Transport and Access [APP-065]** includes link flows and the link on which there would be an increase of over 500% is Neeld Court, Grittleton. This is where there is an existing HGV flow of just three vehicles. This link will provide access to two cable route corridor construction access points, which will be in operation for a temporary period of approximately 90 days.
C4KL-007	Description and DCO Process	Highway Safety	I trust that the Examiner will look closely at Traffic Safety and how to monitor this in the hearings next year.	The Applicant notes this comment and confirms that the Examination is managed by an independently appointed Examining Authority.

5 The Applicant's responses to town councils, parish councils, and parish meetings

5.1 Melksham Without Parish Council

Table 5-1 RR-3141

Reference	Theme	Comments/Issues Raised	Applicant's Response
MWPC-001	Description and DCO Process	Dear Sir or Madam, On behalf of Melksham Without Parish Council, I write in connection with the Lime Down Solar Park Development Consent Order application (EN010168) to accompany our submission to the Examination. The Parish Council wishes to place on record its full support for the Relevant Representation submitted by Community Action: Whitley and Shaw (CAWS). We endorse both the substance and the reasoning of that submission and consider it to be a clear and well-evidenced articulation of the cumulative and system-level impacts arising from the proposed development. Melksham Without Parish Council supports renewable energy development in principle and recognises the importance of national net zero objectives. However, we share CAWS's concern that the current application does not provide a sufficiently robust, integrated or cumulative evidence base to enable the Examining Authority to properly assess impacts on the villages of Shaw, Whitley and Beanacre. These communities occupy a particularly sensitive down-slope, downstream and down-network position within an already highly concentrated cluster of	A comprehensive Cumulative and In-Combination Effects Assessment has been undertaken in accordance with Planning Inspectorate Advice Note 17 and the relevant NPS EN-1, NPS EN-3 and NPS EN-5 requirements which are set out within **ES Volume 1, Chapter 21: Cumulative and In-Combination Effects [APP-073]** and associated Appendices **ES Volume 3, Appendix 21-1 [APP-264].** Interaction of the Scheme with other developments has been fully explored within each of the technical assessments **[APP-059 - APP-072]** with a summary of each of these assessments and their conclusions provided **within ES Volume 1, Chapter 21: In-Combination and Cumulative Effects [APP-073]**. The methodology for identifying future proposed or consented schemes and undertaking the cumulative assessment is in accordance with Planning Inspectorate Advice Note 17 on Cumulative Effects. The four-stage methodology is described within **ES Volume 1, Chapter 6: EIA Methodology [APP-058].** The list of developments included in the cumulative assessment were reviewed and developed in consultation with Wiltshire Council. 358 developments were included in the long list provided within **ES Volume 3, Appendix 21-1 [APP-264].** 41 developments are included in the short list (provided in **Table 21-4 of ES Volume 1, Chapter 21: Cumulative and In-Combination Effects [APP-073**]) including a number of proposed solar and BESS developments. Cumulative and in-combination effects on hydrology, flood risk and drainage have been assessed for the Scheme, including consideration of downstream receptors and the assessment concludes that the Scheme would not increase flood risk or cause adverse cumulative effects on water environment receptors, subject to the embedded mitigation and secured management measures. **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [APP-063]**. The embedded mitigation

Reference	Theme	Comments/Issues Raised	Applicant's Response
		energy and grid infrastructure affecting the Parish.	and management measures relied upon in this assessment form part of the assessed design and are secured through the parameters and commitments set out in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [APP-063]** and the **Flood Risk Assessment and Drainage Strategy [APP-097]**. This conclusion is supported by the Scheme's runoff management approach and construction phase controls, which are secured through the DCO discharge process and the requirement to implement detailed management plans substantially in accordance with the submitted **Outline Construction Environmental Management Plan [APP-277].**
MWPC-002	Hydrology, Flood Risk and Drainage	As set out in detail by CAWS, impacts associated with construction activity, surface-water hydrology, the 22 km Cable Route Corridor, Battery Energy Storage Systems, emergency response capacity and increasing reliance on Melksham Substation do not operate independently. Rather, they interact and compound through shared systems, including headwater drainage networks and emergency services with finite capacity.	The interaction between each of the elements identified is considered both within each of the **Environmental Statement** technical chapters **[APP-059 - APP-72]** and as part of the Cumulative and In-Combination Effects assessment reported **in ES Volume 1, Chapter 21: [APP-073]**. Potential interactions between construction activity, surface water hydrology, the Cable Route Corridor, BESS and other Scheme elements have been considered within the hydrology, flood risk and drainage assessment, including cumulative and in-combination effects on downstream receptors. The assessment concludes that, with the embedded mitigation and secured management measures in place, the Scheme would not give rise to adverse cumulative effects on surface water flood risk or drainage. **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [APP-063**]. Matters relating to emergency response capacity and electrical infrastructure operation do not introduce additional surface water or flood risk pathways beyond those assessed in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [APP-063]**, and therefore do not alter the conclusions of the cumulative hydrology assessment.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Controls on construction phase runoff, trenchless works and pollution prevention along the Cable Route Corridor are secured through the DCO Requirements and the implementation of detailed management plans approved at discharge, ensuring that interactions between these elements do not result in increased flood risk or cumulative surface water effects. **Outline Construction Environmental Management Plan [APP-277]**.
MWPC-003	Hydrology, Flood Risk and Drainage	The Parish Council is particularly concerned that the Environmental Statement relies predominantly on site-by-site and asset-specific assessments, with key matters deferred to outline plans or post-consent stages, thereby limiting the ability of the Examining Authority to understand how cumulative effects would arise in practice.	The ES provides a detailed and comprehensive assessment of all elements of the Project, as described in **ES Volume 1, Chapter 3: The Scheme [APP-055].** Interaction with other developments has been fully explored within each of the technical assessments **[APP-059 - APP-072]** with a summary of each of these assessments and their conclusions is provided within **ES Volume 1, Chapter 21: In-Combination and Cumulative Effects [APP-073].** Accordingly, the cumulative and in-combination assessment identifies and assesses realistic interaction pathways between Scheme elements and other committed developments, and concludes that, with the embedded mitigation and secured management measures in place, the Scheme would not give rise to significant adverse cumulative effects in respect of hydrology, flood risk or drainage. These conclusions are reported in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [APP-063]** and summarised in **ES Volume 1, Chapter 21: In-Combination and Cumulative Effects [APP-073]**.
MWPC-004	Hydrology, Flood Risk and Drainage	The absence of a construction-phase, catchment-scale hydrology and flood-risk assessment, together with the lack of a corridor-wide assessment of cable route construction impacts, represents a material evidential gap.	The Scheme has been assessed for hydrology, flood risk and drainage effects during construction, operation and maintenance and decommissioning, including effects beyond the Order Limits and where pathways could combine through connected headwater drainage networks. The assessment concludes that the Scheme would not increase off-site flood risk, subject to the embedded mitigation and drainage controls set out in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [APP-**

Reference	Theme	Comments/Issues Raised	Applicant's Response
			063] and **ES Volume 3, Appendix 11-1: Flood Risk Assessment and Drainage Strategy – Covering Report [APP-210].** Construction phase mechanisms, including temporary disturbance, soil compaction, sediment-laden runoff, temporary works affecting flow routing, and interaction with drainage features, are assessed and controlled through the secured construction environmental management framework in **Outline Construction Environmental Management Plan [APP-277].** The Cable Route Corridor is assessed on a corridor-wide basis within **ES Volume 3, Appendix 11-9: Flood Risk Assessment and Drainage Strategy – Lime Down Cable Route Corridor [APP-218]**, including construction controls at watercourse crossings and measures to manage exceedance and pollution risks during linear works. On that basis, the submitted evidence does not identify a material evidential gap. No amendments to the application documents are required.
MWPC-005	Hydrology, Flood Risk and Drainage	This is of particular concern given the known sensitivity of Shaw, Whitley and Beanacre to surface-water exceedance and downstream impacts. The Parish Council also shares CAWS's concerns regarding the assessment of clustered Battery Energy Storage Systems, the adequacy of emergency response preparedness, and the reliance on draft or anticipated National Fire Chiefs Council guidance rather than formally issued standards.	Surface water effects, including any potential for downstream exceedance, have been fully assessed for the Scheme. The drainage strategy has been designed to ensure that there is no detrimental change to off-site surface water flood risk, including for downstream communities such as Shaw, Whitley and Beanacre, as set out in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [APP-063].** The Applicant has responded to CAWS in full within the Applicant's Response to **RR-0935 – Community Action: Whitley and Shaw (CAWS)**. The **Outline Battery Safety Management Plan (OBSMP) [APP-286]** is in full alignment with both the original and revised National Fire Chiefs Council guidance. NFCC has published the revised guidance in 2026.
MWPC-006	Human Health	In the Parish Council's view, matters of public safety, environmental protection, infrastructure resilience and cumulative	The Applicant has responded to CAWS in full.

Reference	Theme	Comments/Issues Raised	Applicant's Response
		risk must be demonstrably addressed at the consent stage. They should not be deferred, nor should unresolved risk be transferred to local communities or public services.	The assessment of impacts on public safety with respect to human health has been undertaken in **ES Chapter 18: Human Health [APP-070]**, taking into account the assessment findings for other pertinent topic areas, such as hydrology and flood risk, air quality, and major accidents and disasters. The assessment does not find any significant adverse effects on human health subject to implementation of mitigation measures secured through the Requirements in Schedule 2 to the **Draft DCO [APP-016]**. The Applicant also confirms that the assessment in **ES Chapter 18: Human Health [APP-070]** includes a distinct section on assessment of cumulative health effects from nearby developments. The Applicant also seeks to clarify that works within Melksham Without Parish are limited to the construction of the Grid Connection Cable, construction compounds to facilitate works in the Cable Route Corridor, and works to the existing National Grid Substation, as described in **ES Chapter 3: The Scheme [APP-055]**.
MWPC-007	Hydrology, Flood Risk and Drainage	Accordingly, Melksham Without Parish Council supports CAWS's request that the Examining Authority require further cumulative and system-level assessments, including those relating to hydrology, cable route construction impacts, Battery Energy Storage System major accident risk, emergency response capacity, landscape coalescence and substation resilience, before reaching any decision on the application.	**ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [APP-063]** and **ES Volume 3, Appendices 11-1 to 11-9 Flood Risk Assessment and Drainage Strategies [APP-210 to APP-218]** distinguish between paneled areas and hardstanding areas associated with supporting electrical infrastructure such as BESS and substations, and considers interactions where relevant. In relation to emergency response and any reliance on NFCC guidance, the Scheme's approach for the water environment is to retain and manage potentially contaminated firewater without uncontrolled discharge to surface water or ground, secured through the **Outline Battery Safety Management Plan (BSMP) [APP-286]**. The Applicant is currently in discussion with the Environment Agency (EA) to develop a standalone drainage plan for the BESS area which will be appended to the **Outline BSMP [APP-286]**

Reference	Theme	Comments/Issues Raised	Applicant's Response
			which will cover all key drainage principles and Emergency Response Plan (ERP) requirements. The EA is a statutory consultee which must approve the final Battery Safety Management Plan and requisite ERPs before construction of the BESS commences. An assessment of landscape and visual effects is provided in the Landscape and Visual Impact Assessment (LVIA) presented in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**. Potential environmental and safety effects associated with the Building Failure, Fire and Associated Explosions (including any risk posed by the BESS) are assessed in **ES Volume 1, Chapter 20: Other Environmental Matters, Section 20.7: Major Accidents and Disasters [APP-072].** This assessment considers credible worst-case accident scenarios and concludes that, with embedded mitigation and appropriate management measures, no significant adverse effects are anticipated. Moreover, an **Outline Battery Safety Management Plan (OBSMP) [APP-286]** has been prepared for the Scheme using guidance from Dorset and Wiltshire Fire and Rescue Service (D&WFRS) and incorporating recommendations of the National Fire Chiefs Council. The **OBSMP [APP-286]** is fully compliant with the original NFCC Guidance and the revised guidance which was published in February 2026. The Applicant is in the process of agreeing a Statement of Common Ground (SOCG) with D&WFRS to provide assurance that all safety and emergency response requirements are fulfilled. The **OBSMP [APP-286]** is secured through Requirement 6 (Battery safety management) in Schedule 2 of the **Draft DCO [APP-016]**, which provides that Work No. 2 must not commence until a Battery Safety Management Plan has been submitted to

Reference	Theme	Comments/Issues Raised	Applicant's Response
			and approved by the relevant planning authority. The approved plan must be substantially in accordance with the Outline Battery Safety Management Plan. The Draft DCO also requires the relevant planning authority to consult with Dorset and Wiltshire Fire and Rescue Service and the Environment Agency before determining the application, and that the Battery Safety Management Plan must be implemented as approved.
MWPC-008	Hydrology, Flood Risk and Drainage	We respectfully ask that this letter be read alongside and given appropriate weight in conjunction with the CAWS Relevant Representation.	The Applicant notes this request and confirms that the CAWS Relevant Representation has been considered and responded to in full to RR-0935.

5.2 Grittleton Parish Council

Table 5-2 RR-1742

Reference	Theme	Comments/Issues Raised	Applicant's Response
GPC-001	Description and DCO Process	Grittleton Parish Council objects to the proposed development as it will have a significant impact on the daily lives and wellbeing of residents.	The Applicant has assessed matters relating to people's lives and livelihoods in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068],** and to their health and wellbeing in **ES Volume 1, Chapter 18: Human Health [APP-070].** These assessments find no significant adverse effects to population or individual receptors in Grittleton parish, subject to the implementation of mitigation measures secured through the Requirements in Schedule 2 to the **Draft DCO [APP-016].** With respect to human health, the assessment outcome that there is no significant adverse effect to health generated by the Scheme has been agreed by the UK Health Security Agency in their relevant representation **[RR-4798].**
GPC-002	Soils and Agriculture	Loss of agricultural land – the consequences for food production, loss of local employment on farms and support businesses.	The effects of the Scheme on agricultural land and food production are assessed in **ES Volume 1, Chapter 17: Soils and Agriculture [APP 069]**, with supporting agricultural land classification data provided in **ES Volume 3, Appendix 17 1: Agricultural Land Classification and Soil Resource Survey Report [APP 243]**. The assessment confirms that land would be taken out of arable rotation during the operational period of the Scheme but would remain productive and would be reinstated and returned to agricultural use as far as practicable following decommissioning. Approximately two thirds of the agricultural land affected is not Best and Most Versatile (BMV) quality under the Agricultural Land Classification system. The socio-economic effects of the Scheme, including impacts on agricultural employment and related supply chain businesses, are assessed in **ES Volume 1, Chapter 16: Socio Economics, Tourism and Recreation [APP 068]**. That assessment identifies a likely worst-case reduction of up to 20 full-time equivalent (FTE) agricultural jobs arising from changes in on site farming activity and associated downstream businesses. Measures to support workforce retention, reskilling and re-

Reference	Theme	Comments/Issues Raised	Applicant's Response
			employment are set out in the **Outline Skills, Supply Chain and Employment Plan [APP 285]**. This plan is secured through Requirement 18 in Schedule 2 to the **Draft DCO [APP 016].**
GPC-003	Landscape and Visual	Industrialisation of rural environment – impact on Cotswolds National Landscape and numerous local historic assets, ruination of enjoyment of picturesque countryside.	**ES Volume 1, Chapter 8: LVIA [APP-060]** identifies that there would be significant effects on the character of the landscape within the 1km Local Study Area and the visual amenity of users of some localised footpaths, as a result of the change in land use. However, due to the nature of the dispersed Sites and the character of the receiving landscape, with its rolling topography, the effect of the Scheme on the Wider and Outer Study Area reduces to Non-significant. The Cotswolds National Landscape (CNL) is fully assessed as a standalone receptor within **ES Volume 3, Appendix 8.6: Assessment of Effects on the Special Qualities of the Cotswolds National Landscape [APP-197]**. This assessment considers the effects of the Scheme on landscape character, visual amenity and the special qualities of the CNL, including tranquillity. The assessment found that there would be some short term impact to landscape character within the setting of the CNL but due to the avoidance measures embedded within the Scheme, harm to the CNL itself would be minimal with beneficial effects in the long term which would further the purposes of the designation. In respect of visual amenity, some short-term adverse effects would be experienced by a small number of visual receptors with views to and from the CNL. However, these would reduce over time as a result of the proposed mitigation. The assessment of effects on the special qualities of the CNL scoped out 3 SQs as there is no association with the Site. The assessment found that there are no direct effects on the remaining SQs. There are some Minor/ Negligible short-term effects on a small number of visual receptors within the setting

Reference	Theme	Comments/Issues Raised	Applicant's Response
			of the CNL which effect SQ7 -Tranquillity and SQ13 Archaeology and historic associations. However, these effects are mitigated by Year 15 when proposed vegetation has matured. The assessment also found that there would be beneficial effects on SQ 6 – Biodiversity and nature recovery as a result of the delivery of approximately 119.7 hectares of flower-rich neutral grassland (as defined in the BNG assessment) and SQ 12 - An accessible landscape as a result of the delivery of approximately 12.8km of new permissive paths within the setting of the CNL. The remaining SQs would remain entirely intact. The Scheme was refined through an iterative design process to avoid and reduce effects on the CNL and its setting. Panels along the edge of the CNL were removed from the Order Limits in fields C2, C3 and C4 where significant visual effects on receptors within the CNL were identified. Panels were also removed from fields C1, C6, C8, the western section of C9 and the majority of C10, with this land now proposed for ecological mitigation to protect the setting of the CNL. In addition, panels within fields A11 and A12 were removed, and the land repurposed for ecological mitigation to protect the setting of Sherston within the CNL. All land parcels adjacent to the CNL are proposed to deliver habitat enhancement, informed by the CNL Management Plan and the Cotswolds National Landscape Strategy and Guidelines, to further the purposes of the designation. Details of the proposed landscape and ecological mitigation and enhancement measures are provided in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060], Figure 3-4-1 to 3-4-5.2 Landscape and Ecology Mitigation Plan [APP-084]** and the **Outline Landscape and Ecological Management Plan**

Reference	Theme	Comments/Issues Raised	Applicant's Response
			(OLEMP) [APP-283], and the **Outline Ecological Protection and Mitigation Strategy (EPMS) [APP-284]**. The preparation, approval and implementation of the detailed Landscape and Ecological Management Plan, substantially in accordance with the **OLEMP [APP-283]**, are secured through Requirement 7 in Schedule 2 of the Draft Development Consent Order [APP-016]. The preparation, approval and implementation of the detailed Ecological Protection and Mitigation Strategy, substantially in accordance with the **EPMS [APP-284]**, are secured through Requirement 8 in Schedule 2 of the **Draft Development Consent Order [APP-016]**. These requirements ensure that the identified mitigation and enhancement measures are delivered and maintained throughout the lifetime of the Scheme. The Scheme is not permanent. The application is for a period of up to 60 years operational life. At which point, the Scheme would be required to be decommissioned. **ES Volume 1, Chapter 3: The Scheme [APP-055].** At decommissioning, agricultural fields would be returned back to the landowner, as set out in **ES Volume 1, Chapter 17 Soils and Agriculture [APP-069]**. The LVIA in **[APP-060]** considers the effects of the Scheme at decommissioning and notes that as infrastructure is removed, there would be an overall benefit to the character of the area with landscape proposals retained providing long term benefit towards the legacy landscape. Following decommissioning, the land within the Order Limits would benefit from the significantly enhanced tree and hedgerow planting that has been carried out and has matured to create a much stronger and robust landscape, retaining, and enhancing the overall character and providing considerable biodiversity benefits over the years. Due

Reference	Theme	Comments/Issues Raised	Applicant's Response
			to the development, the landscape would be left in a better condition than current day. This betterment is established as a consequence of the landscape proposals resulting in greater species variety, greater age depth, enhanced structure, resilience to pest and disease and reinforcement of local landscape character across the Sites. The proposals have been developed in line with Wiltshire's Nature Recovery Strategy and the defining legacy of the landscape would be the robust framework of features that have improved through the mitigation and landscape enhancements embedded within the Scheme. This mitigation in turn would give rise to long-term wider benefits, including maintaining and enhancing biodiversity and in promoting the resilience of ecosystems. Measures to manage decommissioning and reinstatement are set out in the **Outline Decommissioning Strategy [APP-279]**, which has been submitted as part of the DCO Application. The Decommissioning Strategy will include robust methodologies and control points to avoid contamination of the underlying land with physical or chemical contaminants and will be applied in conjunction with the Soil Resources Management Plan (SRMP) in order to promote successful reinstatement. A detailed Decommissioning Strategy will be prepared substantially in accordance with the **Outline Decommissioning Strategy [APP-279]** and must be submitted to and approved by the relevant local planning authority prior to the commencement of decommissioning. This is secured through Requirement 20 in Schedule 2 of the **Draft Development Consent Order [APP-016]**. In addition, the Applicant is seeking a time-limited consent for the Scheme to have an operational period of 60 years, with decommissioning

Reference	Theme	Comments/Issues Raised	Applicant's Response
			to take place following cessation of operation. This is secured by Requirement 20 in Schedule 2 of the **Draft DCO [APP-016]**. The potential effects of the Scheme on cultural heritage, including archaeological assets dated to the Roman and medieval periods, are fully assessed in **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, supported by detailed technical appendices in **ES Volume 3, Appendices 12-1 to 12-8 [APP-219 to APP-232]**. The chapter considers baseline conditions, identifies built and archaeological heritage assets within the study area, and assesses likely effects during construction, operation and decommissioning, including effects on setting. The chapter concluded that, following mitigation, the residual effects on any archaeological assets including Roman and medieval period remains, would be neutral/negligible and therefore not significant (see **Volume 3, Appendix 12-8 Cultural Heritage Impact Assessment Tables [APP-232]**). The assessment is underpinned by extensive desk-based research, geophysical survey and evaluation trenching, as detailed in **ES Volume 3, Appendix 12-2: Archaeological Desk-Based Assessments [APP-220] and [APP-221]**, **Appendix 12-4: Archaeological Geophysical Survey Reports [APP-223] and [APP-224]**, and **Appendix 12-5: Interim Evaluation Trial Trenching Reports [APP-225] to [APP-229]**. The Applicant notes that the approach to the assessment has been agreed with Wiltshire Council and the methodology for the mitigation strategy is being discussed with Wiltshire Council and is set out in the relevant Statement of Common Ground to be submitted at Deadline 1**.** Embedded mitigation measures to avoid or reduce harm to heritage assets are set out in Section 12.9 of **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, with additional mitigation measures detailed in Section 12.11. An overarching

Reference	Theme	Comments/Issues Raised	Applicant's Response
			archaeological mitigation strategy is provided in **ES Volume 3, Appendix 12-6: Outline Archaeological Mitigation Strategy [APP-230]**, which sets out the framework for further archaeological investigation, recording and protection where ground disturbance cannot be avoided. The preparation, approval and implementation of detailed archaeological Written Schemes of Investigation for each part of the Proposed Development, substantially in accordance with **Appendix 12-6 Outline Archaeological Mitigation Strategy [APP-230]**, are secured through Requirement 12 of Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that appropriate protection, recording and mitigation are delivered during the relevant part of the Proposed Development.
GPC-004	Landscape and Visual	Cumulative impact - many local residents will find that their daily journeys are through the plethora of solar farms that have already been permitted in this part of Wiltshire, changing the countryside from open rolling with stone walls along with hedgerows to glass and metal structures surrounded by security fencing to shield the monocolour of panels.	A comprehensive Landscape and Visual Cumulative Assessment has been undertaken for the Scheme **(see ES Volume 1, Chapter 8: LVIA section 8.13) [APP-060]** together with **ES Volume 1, Chapter 21: Cumulative and In-Combination Effects [APP-073].** No cumulative landscape and visual effects are identified within the 10km Cumulative Study Areadue to the limited interaction and inter-visibility between the Lime Down scheme and other consented, proposed or reasonably foreseeable projects. Further, a comprehensive Cumulative and In-Combination Effects Assessment has been undertaken in accordance with Planning Inspectorate Advice Note 17 and the relevant NPS EN-1, NPS EN-3 and NPS EN-5 requirements which are set out within **ES Volume 1, Chapter 21: Cumulative and In-Combination Effects [APP-074]** and associated Appendices **[APP-264].** Interaction with proposed or consented but not yet built developments has been fully explored within each of the technical assessments **[APP-059 - APP-072]** with a summary of each of these assessments provided within **ES Chapter 21 [APP-073].** Existing schemes are captured within the baseline

Reference	Theme	Comments/Issues Raised	Applicant's Response
			environment. The four stage cumulative assessment methodology is described within **ES Chapter 6 EIA Methodology [APP-058].** 358 developments were included in the Long List **[APP-264].** 41 developments are included in the short list (and are therefore assessed) including a number of proposed solar and BESS developments. The list of developments included in the cumulative assessment was reviewed and developed in consultation with Wiltshire Council. Taking a conservative worse case approach, significant cumulative effects are identified at a limited and discrete number of receptors comprising tourism and recreation impacts during the construction phase on Corsham Park, PRoW WT|CORM|122, long path and Sustrans Cycle Route 403, and on skylark at a District level.
GPC-005	Site Selection and Alternatives	Unsuitable site location – distance from grid connection – causing disruption to a large number of people along the proposed cable route.	The Applicant confirms that the existing National Grid Melksham substation has been identified as the point of connection. This decision was based on available capacity, network resilience, and strategic grid planning. As explained in **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185],** an initial search area was identified at a 5 km radius from the POC, however this was later expanded as no suitable and available sites within 5 km were identified. The search area was enlarged incrementally to a 20 km radius which is considered by the Applicant to be a viable cable connection distance for a solar project of this scale. The POC and 20 km search area is shown on Figure 1, Annex C of **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185].** Further, from an operational perspective, high voltage electricity transmission at 400kV, which in this case is proposed to connecct the site to Melksham substation, is specifically designed to minimise energy losses over long distances. As such, the length of the proposed cable route will result in negligible electrical losses. This is supported by NPS EN-1 paragraph 3.3.12, which recognises that high voltage transmission allows for a more

Reference	Theme	Comments/Issues Raised	Applicant's Response
			efficient bulk transfer of power than transmission at lower voltages. More details on how the Cable Route Corridor has been located and designed can be found in **ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP-056]**. Several factors were considered to take a direct route whilst following existing features, such as roads, and avoiding sensitive receptors as far as practicable, such as habitat designations, residential and commercial properties, heritage assets, and a large number of land interests. The assessments set out in the various chapters of the **ES [APP-052 to APP-265]** detail what impacts are expected as a result of the Scheme based on the minimum and maximum parameters of the Scheme, and the mitigation and enhancement measures that are proposed to reduce these impacts. Details of how those mitigation and enhancement measures is provided in the **Draft DCO [APP-016].**
GPC-006	Transport and Access	Unsuitable road access routes – affecting day to day life in the rural environment and the ability to maintain existing lifestyle.	The proposed construction routes have been carefully assessed (as set out within **ES Volume 1, Chapter 13-1: Transport and Access [APP-065]**) and are considered to be the most appropriate routes to the Scheme. Construction traffic would also be temporary and controlled through measures in a CTMP. An **Outline Construction Traffic Management Plan (Outline CTMP) [APP-287]** supports the DCO Application and includes outline measures to minimise transport and access impacts as far as practicable. This includes road condition surveys to ensure any damage to the highway network caused by construction traffic is identified and rectified, management of construction deliveries to avoid the requirement for HGVs generated by the Scheme passing each other in opposite directions on the local roads, and restricted hours of deliveries outside of peak hours. With this mitigation in place, **ES Volume**

Reference	Theme	Comments/Issues Raised	Applicant's Response
			1, Chapter 13-1: Transport and Access [APP-065] concludes that impacts would be negligible to minor adverse. A final CTMP would be prepared post consent and must be substantially in accordance with the **Outline CTMP [APP-287]** and approved by the relevant local planning authorities (in consultation with the relevant highway authorities), as secured by Requirement 15 in Schedule 2 of the **Draft DCO [APP-016]**.
GPC-007	Transport and Access	No alternative transport considered for delivery of equipment, thus forcing construction traffic onto unsuitable rural roads, again disrupting residential and working daily life.	The proposed construction routes have been carefully assessed in **ES Volume 1, Chapter 13-1: Transport and Access [APP-065]** and **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]** and are considered to be the most appropriate routes to the Scheme. Alternative modes of transport for delivery are limited and considered to be unfeasible. Construction traffic would also be temporary and controlled through measures in a CTMP. An **oCTMP [APP-287]** supports the DCO Application and includes outline measures to minimise transport and access impacts as far as practicable. This includes road condition surveys to ensure any damage to the highway network caused by construction traffic is identified and rectified, management of construction deliveries to avoid the requirement for HGVs generated by the Scheme passing each other in opposite directions on the local roads, and restricted hours of deliveries outside of peak hours. With this mitigation in place, **ES Volume 1, Chapter 13-1: Transport and Access [APP-065]** concludes that impacts would be negligible to minor adverse. A final CTMP would be prepared post consent and must be substantially in accordance with the **oCTMP [APP-287]** and approved by the relevant local planning authorities (in consultation with the relevant highway authorities), as secured by Requirement 15 in Schedule 2 of the **Draft DCO [APP-016]**.

Reference	Theme	Comments/Issues Raised	Applicant's Response
GPC-008	Transport and Access	Transport management plan unenforceable thus disrupting existing lifestyle, commuting and school journeys.	An **oCTMP [APP-287]** supports the DCO Application and includes outline measures to minimise transport and access impacts as far as practicable. A final CTMP would be prepared post consent and must be substantially in accordance with the **oCTMP [APP-287]** and approved by the relevant local planning authorities (in consultation with the relevant highway authorities), as secured by Requirement 15 in Schedule 2 of the **Draft DCO [APP-016]**.
GPC-009	Socio-Economics, Tourism and Recreation	Impact on tourism during the construction period and going forward due to ruination of countryside, this will cause the loss of employment in the many tourist/hospitality businesses in the area.	The Applicant has assessed that there is a likely worst-case temporary loss of 50 FTE tourism industry jobs as a result of the Scheme, as set out in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068**]. This accounts for less than 0.7% of tourism-based employment within 5 km of the Scheme (BRES, 2023 data), and approximately 0.17% of tourism employment across Wiltshire (29,000 estimate from Visit Wiltshire, 2021). Where losses to tourism have been identified, these are worst-case estimates based on likely significant effects from the Scheme and do not include for additional mitigation measures being applied. This is also a temporary effect, anticipated to occur during construction, with recovery to tourism businesses anticipated to begin as soon as construction works are complete. During the Scheme's operational phase, the reduction in tourism compared to current conditions is anticipated to be equivalent to a loss of 11 FTE tourism-dependent jobs. Additional mitigation measures through the **OSSCEP [APP-285]** seek to reduce these losses through focusing on local recruitment, promoting local suppliers where practicable, and through providing retraining opportunities for workers in tourism-dependent industries. It is considered that these measures would help to reduce local losses in the local economy, and help to generate additional GVA in the local economy in alternative

Reference	Theme	Comments/Issues Raised	Applicant's Response
			industries. The OSSCEP is secured by Requirement 18 in Schedule 2 to the **Draft DCO [APP-016].**
GPC-010	Transport and Access	Cable Route Access points are impractical and potentially damaging to conservation areas (Grittleton Village – Leigh Delamere – Sevington) thus impacting local residents in these small rural communities. Many of the properties in these parish areas have no off-street parking, so these roads are unsuitable for increased traffic volumes.	**ES Volume 3, Appendix 12-1 Heritage Statement** assessed the impact on the conservation areas and concluded that as the overall construction impacts will be temporary in nature, there will be no harm to the character and appearance of the Conservation Areas once construction works have finished. Construction impacts will also be controlled through measures in the final CTMP. **ES Volume 1, Chapter 13: Transport and Access [APP-065]** assesses all highway links on the construction routes and takes account of sensitive receptors, such as residential areas (including Grittleton village), and concludes there are no significant impacts. **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]** demonstrates there would only be 4 HGVs per day, equivalent of one movement per hour during construction times for a temporary 90-day period. The proposed construction routes have been carefully assessed within **ES Volume 1, Chapter 13 [APP-065]** and are considered to be the most appropriate routes to the Scheme. These are already suitable for existing traffic and would be able to accommodate the additional traffic required. Construction vehicle movements will be managed through a Construction Traffic Management Plan. An **Outline Construction Traffic Management Plan (CTMP) [APP-287]** has been prepared and submitted with the DCO application. The aim of the CTMP is to ensure that the effect of the construction phase on the local highway network is minimised. The **Outline CTMP [APP-287]** sets out measures to coordinate construction deliveries by HGVs to arrive and depart between 09:30 and 16:30 where possible, to avoid peak network hours of

Reference	Theme	Comments/Issues Raised	Applicant's Response
			08:00–09:00 and 17:00–18:00. It also includes a community liaison element to keep local communities informed about the construction process and to provide a contact for feedback should any issues arise. Compliance with the CTMP will be monitored by the Developer, Contractor and Wiltshire Council as local highway authority. The preparation, approval and implementation of the final CTMP, substantially in accordance with the outline CTMP, are secured through Requirement 15 of Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring construction traffic impacts are appropriately managed throughout the construction phase of the Scheme.
GPC-011	Consultation and Engagement	Furthermore, the outcome of a recent wide-ranging parish council survey clearly highlighted and evidenced residents' concerns and frustrations about the development.	The Applicant acknowledges the results of Grittleton Parish Council's recent survey and the concerns expressed by some residents. While recognising local sentiment, the Application must be determined on the basis of the technical assessment and objective evidence presented. The **ES [APP-052 to APP-265]** includes comprehensive assessment and mitigation across all relevant environmental topics, and the **Planning Statement [APP-267],** including Annexes A and B, demonstrates that the Scheme accords with applicable national and local planning policy. On this basis, the Applicant remains confident that the Scheme has been robustly assessed and that appropriate measures are in place to avoid, reduce or mitigate potential effects.

5.3 St Paul Malmesbury Without Parish Council

Table 5-3 RR-4432

Reference	Theme	Comments/Issues Raised	Applicant's Response
SPMWPC-001	Hydrology, Flood Risk and Drainage	The St Paul Malmesbury Without Parish Council strongly opposes the Lime Down solar project for these principal reasons. At a later stage the Council will have further concerns to raise but for now the major ones are: 1 Flooding 1.i Many properties experience perennial flooding from the Gauzebrook. SPMWPC plans, in their infancy at present, seek to alleviate flooding by the use of upstream flood ponds. The Lime Down installation of panels, the BESS and other infrastructure would not only prevent this plan being delivered, but would significantly increase the existing levels of flooding from run-off. 1.	The Applicant notes the concern that land which the Parish Council has identified for potential upstream flood ponds may overlap with areas proposed for the Scheme. The potential for changes to runoff, floodplain behaviour and downstream flood risk has been assessed in **ES Volume 1, Chapter 11 Hydrology, Flood Risk and Drainage [APP-063]**, with supporting drainage principles set out in **Flood Risk Assessment and Drainage Strategy – Covering Report [APP-210]**. The assessment concludes that the Scheme would not give rise to significant effects on flood risk receptors and would not increase flood risk elsewhere. Panelled areas are designed so rainfall continues to drain to ground, and supporting infrastructure such as the BESS is subject to site specific engineered drainage and pollution control measures, as set out in **ES Volume 1, Chapter 11 Hydrology, Flood Risk and Drainage [APP-063]** and **ES Volume 3, Appendix 11-1: Flood Risk Assessment and Drainage Strategy – Covering Report [APP-210].** The Applicant recognises that the Parish Council's early stage flood alleviation proposals are separate to the Application and may be refined over time. The Scheme does not include or rely on land safeguarded for third party flood alleviation works, and any future proposals for upstream flood ponds would need to be progressed through the relevant land, technical and consenting processes.
SPMWPC-002	Hydrology, Flood Risk and Drainage	ii Run-off from the proposed infrastructure on to delicate compressed largely clay soils will only exacerbate the flooding problem.	The Applicant notes the concern regarding runoff from infrastructure on clay soils. The assessment of hydrology, flood risk and drainage within **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [APP-063]**, supported by **ES Volume 3, Appendix 11-1: Flood Risk Assessment and Drainage Strategy – Covering Report [APP-210]**, considers the mechanisms by which runoff could increase as a result of the Scheme, including soil compaction, interception of overland flow

Reference	Theme	Comments/Issues Raised	Applicant's Response
			and temporary construction effects. The assessment concludes that the Scheme would not increase runoff rates or volumes leaving land within the Order Limits and would not exacerbate flooding, subject to the embedded mitigation and drainage controls secured through the **Draft Development Consent Order [APP-016]**. In accordance with National Policy Statement EN-3 paragraph 3.10.75, **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [APP-063]** confirms that solar PV panels generally drain to ground and do not, in themselves, create significant drainage impacts. Panelled areas are designed so rainfall continues to drain to ground, with no increase in runoff leaving the Order Limits. Any potential risk of increased runoff is associated with ground disturbance rather than the presence of panels. Construction phase risks on clay soils, including soil compaction and sediment mobilisation, are addressed through secured controls for soil handling, trafficking management and temporary drainage set out in the **Outline Construction Environmental Management Plan [APP-277]**, which is secured through Requirements in the **Draft Development Consent Order [APP-016]**. These measures ensure that runoff pathways are controlled during construction and that flood risk is not increased. No amendments to the application documents are required.
SPMWPC-003	Transport and Access	2 Highways and traffic 2.i The narrow roads are simply not suitable for heavy construction traffic.	The assessment presented in Annex H of **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]** demonstrates adequate carriageway width or frequency of passing place opportunity to pass at least an HGV and a light vehicle. To provide further comfort, additional information will be added to **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]** and resubmitted at Deadline 1 of Examination to

Reference	Theme	Comments/Issues Raised	Applicant's Response
			demonstrate that there is adequate carriageway width and/or passing place opportunity for two HGVs when accessing Lime Down Site D. An **oCTMP [APP-287]** supports the DCO Application and includes outline measures to minimise transport and access impacts as far as practicable. This includes road condition surveys to ensure any damage to the highway network caused by construction traffic is identified and rectified, management of construction deliveries to avoid the requirement for HGVs generated by the Scheme passing each other in opposite directions on the local roads, and restricted hours of deliveries outside of peak hours. With these measures in place, **ES Volume 1, Chapter 13-1: Transport and Access [APP-065]** concludes that the impact would be negligible to minor adverse. A final CTMP will be prepared post consent and will be substantially in accordance with the **oCTMP [APP-287]** and approved by the relevant local planning authorities (in consultation with the relevant highway authorities), as secured by Requirement 15 in Schedule 2 of the **Draft DCO [APP-016]**.
SPMWPC-004	Transport and Access	2.ii The proposed 'new' road from the busy A429 to provide direct access to site E and left to site D will likely cause major hold ups.	The road identified is an internal haul road. An access is proposed along the A429, however, the use of the access will be subject to the measures within the **oCTMP [APP-287]** which include delivery booking and a requirement to undertake HGV deliveries outside of highway peak hours. Highway network peak hours are when the highway would be at its busiest, so avoiding this period would limit the potential for any delays. Peak hour capacity assessment cannot be undertaken as there will be no construction deliveries during the peak hour. However, daily impact has been assessed in **ES Volume 1, Chapter 13-1: Transport and Access [APP-065]** combined with the temporary and low number of predicted delivery trips, the impact on the A429 link will be negligible as shown in Table 13-24 of **ES Volume 1, Chapter 13-1: Transport and Access [APP-065].**

Reference	Theme	Comments/Issues Raised	Applicant's Response
SPMWPC-005	Transport and Access	2.iii The proposed route for abnormal indivisible loads (AIL) via Cirencester around the Malmesbury by-pass and the necessary road alterations to accommodate this, will cause disruption to residents' journeys.	The AILs are one-off movements that typically have a police escort and will not require significant or permanent highway works. They will result in a one-off temporary disruption at the time of the AIL delivery. Residents will be notified prior to these movements, as per normal AIL procedure. Further detail regarding these procedures is set out in the **oCTMP [APP-287]**.
SPMWPC-006	Other Environmental Matters	3 The BESS 3.i Residents are severely alarmed about the intention to locate the BESS so near to homes and the railway line because of the possibility of fire, and as a consequence question how emergency services will access any conflagration and obtain sufficient water to extinguish it.	The location of the Battery Energy Storage System (BESS) has been informed by a detailed site selection and design evolution process, as set out in **ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP-056]**. This chapter explains that land at Lime Down D was identified as an appropriate location due to its proximity to the solar PV arrays and the on-site substation, providing operational benefits including minimising transmission losses, maximising storage efficiency, and enabling rapid and reliable grid response. In considering options for co-locating the BESS with the solar PV Sites, Lime Down D was selected as the preferred location due to its central position within the Scheme, effective natural and proposed screening, limited proximity to residential properties, and closeness to existing infrastructure corridors, including the railway line. Locating the BESS within an existing infrastructure corridor reduces the need for additional land take and avoids introducing new isolated infrastructure into undeveloped areas. The assessment concludes that siting the BESS at Lime Down D presents the lowest potential for significant adverse environmental effects. Accordingly, the proximity of the BESS to the railway line does not give rise to significant safety or environmental concerns. The Applicant has followed National Fire Chiefs Council (NFCC) guidance and commissioned a Plume Assessment Study (**ES Volume 3, Appendix 15-2 BESS Fire Emissions Modelling [APP-239]**) to model toxic gas emissions and visibility impacts

Reference	Theme	Comments/Issues Raised	Applicant's Response
			from a BESS fire on all sensitive receptors within a 1km radius of the BESS area. The fire emissions modelled in the report were based upon recent UK Health Security Agency (UKHSA) requests for DCO BESS projects which explore both immediate air quality impacts together with annual UK air quality requirements. Six worst case BESS fire locations (i.e. locations within the BESS Area closest to sensitive receptors) have been modelled as depicted in **ES Volume 2, Figure 15-5: Battery Energy Storage System Fire Emissions Study Area [APP-166].** The Concentrations of carbon monoxide (CO), formaldehyde, hydrogen chloride (HCl), hydrogen cyanide (HCN), hydrogen fluoride (HF), ammonia (NH_3), nitrogen dioxide (NO2) and particulates from a potential BESS fire have been modelled using an air quality dispersion model to determine the likely effects on human health. A high-level visibility assessment has also been undertaken using the modelled particulates results to determine the effect of BESS fire emissions on visibility on the local road and rail network to inform the **Outline Battery Safety Management Plan (BSMP) [APP-286].** The Plume Assessment Study has concluded that there are no significant toxic emission or visibility impacts at all sensitive receptor locations. The Applicant has also committed to commissioning an additional Plume Analysis Study at the detailed design stage as stipulated in Section 5.5.9 of the **Outline BSMP [APP-286]** and secured through the **Draft DCO [APP-016]** via Requirement 6.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			As now mandated under NFPA 855 (2026), the Applicant will only be able to select a BESS system that has undertaken Large Scale Fire Testing (LSFT). At the detailed design stage, the selected BESS LSFT data will be leveraged to fully inform inputs for risk assessment tools which will be utilised together with detailed consequence modelling to provide a comprehensive site operations and emergency response safety audit, this is stipulated in the OBSMP pre-construction requirements. Section 5 of the **Outline BSMP [APP-286]** covers all requisite firefighting requirements for the Scheme including fire service access, firefighting water supply, and emergency planning requirements. The Applicant notes that the approach to BESS safety is being discussed with Dorset & Wiltshire Fire & Rescue Service (D&WFRS) and is set out in the relevant Statement of Common Ground to be submitted at Deadline 1.
SPMWPC-007	Landscape and Visual	4 Landscape, Noise and Amenity 4.i Disruption to PRoWs, visual impact and noise from the project all contribute to severe adverse impacts on the well-being of people living in neighbouring properties and walkers using the much-loved lanes and footpaths	With respect to visual impact, **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]** identifies that there would be some significant effects on the visual amenity of users of some localised footpaths, as a result of the Scheme. This predominantly relates to locations where footpaths diagonally cross fields and mitigation planting would be inappropriate to landscape character and the legacy landscape. A detailed assessment of the likely significance of effects from the Scheme on the use and desirability of individual PRoW and recreational access to the countryside is included in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** and **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]**. This assessment considers the impact on individual recreational routes, including their practical use, enjoyment and desirability. The Applicant confirms that the majority of significant adverse effects can be mitigated. However, some significant adverse effects to users of

Reference	Theme	Comments/Issues Raised	Applicant's Response
			PRoW and unsurfaced roads in Lime Down E during construction cannot be mitigated further. No significant residual effects are anticipated during the operational phase of the Scheme. The assessment in **ES Volume 1, Chapter 18: Human Health [APP-070]** also considers the physical and mental health impacts of changes to recreation and countryside access under the assessment topic 'open space, leisure and play', and concludes that no significant adverse effects are anticipated at any phase of the Scheme. The Applicant confirms that existing PRoW are to be controlled within the Scheme design, with management measures set out in the **Outline Public Rights of Way and Permissive Paths Management Plan (PROWPPMP) [APP-282]**, confirmed as embedded mitigation in Section 16.9 of ES Chapter 16. New permissive access routes have been incorporated into the Scheme design, shown as Work No. 10 on the **Works Plan [APP-007]** and illustrated on **ES Volume 2, Figure 3-4: Landscape and Ecology Mitigation Plan [APP-084]**. These are identified as additional mitigation and enhancement measures in Section 16.11 of ES Chapter 16. The Scheme is not permanent. The application is for a period of up to 60 years operational life. At which point, the development would be required to be decommissioned.**ES Volume 1, Chapter 3: The Scheme [APP-055].** At decommissioning, agricultural fields would be returned back to the landowner. As infrastructure is removed, landscape proposals will be retained providing long term benefit towards legacy landscape. Following decommissioning, the land within the Order Limits would also benefit from the significantly enhanced tree and hedgerow planting that has been carried out and has matured to create a much stronger and robust

Reference	Theme	Comments/Issues Raised	Applicant's Response
			landscape, retaining, and enhancing the overall character and providing considerable biodiversity benefits over the years. This betterment is established as a consequence of the landscape proposals resulting in greater species variety, greater age depth, enhanced structure, resilience to pest and disease and reinforcement of local landscape character across the Sites. Information on decommissioning activities is provided within the **ES [APP-052 to APP-265]** and within the **Outline Decommissioning Strategy [APP-279]**. The information is provided in accordance with the requirements of Part 1 of Schedule 4 of the EIA Regulations 2017 (as amended). Schedule 4 of the EIA Regulations 2017 (as amended) set out the information for inclusion in an ES. **ES Volume 1 Chapter 1 Introduction [APP-053]** Table 1-2 identifies where the requirements of Schedule 4 of the EIA Regulations 2017 (as amended) have been addressed. Measures to manage and minimise disruption during decommissioning are set out in the **Outline Decommissioning Strategy [APP-279]**. This explains how mitigation measures identified in the **ES [APP-052 to APP-265]** will be implemented during decommissioning and includes controls for working hours, noise, lighting, traffic management, pollution prevention, waste management and community liaison. A detailed Decommissioning Strategy will be prepared substantially in accordance with the **Outline Decommissioning Strategy [APP-279]** and must be submitted to and approved by the relevant local planning authority prior to the commencement of decommissioning. This is secured through Requirement 20 in Schedule 2 of the **Draft Development Consent Order [APP-016].** The proposals have been developed in line with Wiltshire's Nature Recovery Strategy and the defining legacy of the

Reference	Theme	Comments/Issues Raised	Applicant's Response
			landscape would be the robust framework of features that have improved through the mitigation and landscape enhancements embedded within the Scheme. This mitigation in turn would give rise to long-term wider benefits, including maintaining and enhancing biodiversity and in promoting the resilience of ecosystems. An assessment of the effects of the Scheme on noise and vibration is provided in **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**, with supporting technical information supplied in **ES Volume 3, Appendix 14-4: Noise Modelling [APP-237]**. The assessment considers potential noise and vibration impacts during construction, operation and decommissioning, including from solar PV panels and associated infrastructure. The Applicant notes that the approach to noise and vibration has been discussed with Wiltshire Council, as described in Section 14.2 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**. <u>Construction phase</u> The noise and vibration impacts arising from construction activities are assessed in Section 14.10 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**. For the purposes of the assessment, a reasonable worst-case scenario assuming piling activities has been considered. Mitigation measures associated with construction activity are presented in Section 14.9 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]** and are committed to through the **Outline Construction Environmental Management Plan [APP-277]**. With these measures in place, the assessment concludes that no significant effects from construction noise or vibration are expected. A noise

Reference	Theme	Comments/Issues Raised	Applicant's Response
			monitoring programme agreed with Wiltshire Council will be carried out during construction. The preparation, approval and implementation of the Construction Environmental Management Plan, substantially in accordance with the **Outline CEMP [APP-277]**, is secured through Requirement 13 in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that construction noise and vibration are appropriately controlled. <u>Operational phase</u> The noise impacts from the operation of the Scheme and its components are assessed in Section 14.10 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**, with supporting modelling provided in **ES Volume 3, Appendix 14-4: Noise Modelling [APP-237]**. A penalty has been applied to predicted noise levels from the Solar PV Sites to account for the distinctive nature of the sound. Potential mitigation measures are detailed in Section 14.9 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**, and with such measures in place, significant effects from operational noise are not expected. The **Outline Operational Environmental Management Plan [APP-278]** commits to noise levels from the Scheme at residential dwellings being the same as or below those modelled in the ES. This provides assurance that significant effects from operational noise will be avoided, while allowing flexibility in how this is achieved. The preparation, approval and implementation of the detailed OEMP, substantially in accordance with the outline plan, are secured through Requirement 14 of Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring operational

Reference	Theme	Comments/Issues Raised	Applicant's Response
			noise is appropriately controlled throughout the lifetime of the Scheme.

5.4 Corsham Town Council

Table 5-4 RR-0941

Reference	Theme	Comments/Issues Raised	Applicant's Response
CTC-001	Description and DCO Process	The Notice of Acceptance of an application for a Development Consent Order by the Planning Inspectorate (on behalf of the Secretary of State) under Section 56 of the Planning Act 2008 was considered by Corsham Town Council at its Planning Committee meeting on 3 December 2025. At that meeting it was resolved that Corsham Town Council would submit a representation to the Planning Inspector by 9 January 2026, that re-stated the objections to the application that the Town Council had made previously as below: Corsham Town Council (Planning) meeting on 25 June 2025:	The Applicant notes Corsham Town Council's objections and has responded in full in the responses below.
CTC-002	Transport and Access	The Town Council objects to the proposed amendment to the development of the boundary area at the A350/Corsham Road junction involving the temporary removal of traffic lights to allow an abnormal load vehicle to turn at the junction. The A350 is one of the most important traffic routes through Wiltshire and the removal of traffic lights from this junction, however temporary, would cause a significant increase in traffic congestion and risk of accidents.	Permanent signals will be removed to accommodate AIL movements. It is likely these will be replaced by temporary signals with similar signal timings as the existing signals to ensure normal operation of the junction. As set out in the **Outline Construction Traffic Management Plan (CTMP) [APP-287]** full details of the form and proposed locations of any signs or signals to be placed on a public highway will be submitted to Wiltshire Council in advance of being placed (either as part of the Final CTMP or separately).
CTC-003	Transport and Access	The Town Council also objects to the Lime Down Solar Park project in general, as it has the following additional concerns:	The effects of construction traffic on the local highway network are assessed in **ES Volume 1, Chapter 13: Transport and Access [APP-065]**, which considers construction vehicle routing, traffic volumes and potential impacts on highway safety

Reference	Theme	Comments/Issues Raised	Applicant's Response
		• the detrimental impact that the Abnormal Load, HGV's and other construction vehicles will have on the local roads in terms of highway damage and traffic congestion	and road condition. The assessment concludes that, with appropriate management measures in place, construction traffic effects can be appropriately controlled. Mitigation measures to manage construction traffic and protect local roads are set out in the **Outline Construction Traffic Management Plan (CTMP) [APP-287]**. The CTMP has been developed to minimise impacts on the local highway network and includes measures for routing, scheduling of deliveries and liaison with the local highway authority. A road condition and dilapidation survey of minor roads not typically used by HGV traffic is included as a measure within the CTMP. Any damage to verges or carriageway surfaces caused by construction vehicles will be rectified to the satisfaction of the local highway authority. The preparation, approval and implementation of the final CTMP, substantially in accordance with the outline CTMP, are secured through Requirement 15 of Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring construction traffic impacts, including potential damage to local roads, are appropriately managed throughout the construction phase of the Scheme
CTC-004	Description and DCO Process	• the huge scale of the development including the size and quantity of the solar panels	The Scheme has been designed to deliver the greatest possible benefit from the available land and the available grid connection, whilst avoiding, minimising and/or mitigating harmful environmental effects. As per the description set out in **ES Volume 1, Chapter 3: The Scheme [APP-055]** the total area within the DCO Order Limits encompasses approximately 1,237 hectares (ha). Of this, the 'Solar PV Sites' comprise approximately 749.1 ha of land. Around 479.5 ha of this land is proposed as being required for installation of solar PV, battery storage, and associated infrastructure. The remaining 269.5 ha would provide areas

Reference	Theme	Comments/Issues Raised	Applicant's Response
			dedicated to ecological mitigation, measurable Biodiversity Net Gain (BNG) delivery, landscaping, offsets and agricultural land managed for environmental enhancement and habitat creation. The Cable Route Corridor, which stretches approximately 22 km from 'Lime Down D' to Melksham Substation and links together the Solar PV Sites, covers approximately 463.2 ha. Approximately 17.8 ha (of which 5.9 ha overlap with the Cable Route Corridor) is proposed for Highway Improvement Areas within which improvements to sections of the existing highway network will be completed to facilitate access to the Scheme, such as improvements to road edge and traffic management. Work will be undertaken by the Applicant and National Grid within the Existing National Grid Melksham Substation, requiring a total area of 12.8 ha. The height of the solar PV panels has been assessed using clearly defined design parameters, including a maximum height of 4.5 metres above ground level at maximum tilt, as set out in **ES Volume 1, Chapter 3: The Scheme [APP-055]**. These parameters represent a realistic worst-case scenario for the purposes of the Environmental Impact Assessment. The landscape and visual effects of the Scheme, including the effects of the maximum panel height, are assessed in the Landscape and Visual Impact Assessment (LVIA) presented in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**. The LVIA assesses effects on identified landscape and visual receptors during construction, operation and decommissioning, using the maximum design parameters to ensure a robust assessment. Mitigation measures to address landscape and visual effects, including measures that reduce the perceived height and prominence of panels in views, are set out in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060], Figure 3-4-1 to**

Reference	Theme	Comments/Issues Raised	Applicant's Response
			3-4-5.2 Landscape and Ecology Mitigation Plan [APP-084] and detailed within the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]**. These include new and enhanced planting, retention of existing hedgerows and woodland, and landscape integration measures to reduce visual effects over time. The preparation, approval and implementation of the detailed Landscape and Ecological Management Plan, substantially in accordance with the **OLEMP [APP-283]**, are secured through Requirement 7 in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that the identified mitigation measures are delivered and maintained throughout the lifetime of the Scheme.
CTC-005	Other Environmental Matters	• the volume of cabling and impact this will have on farmland and the environment.	The effects of the Scheme on soils and agricultural land, including those associated with the installation of underground cabling, are assessed **in ES Volume 1, Chapter 17: Soils and Agriculture [APP 069]**, with supporting information provided in **ES Volume 3, Appendix 17 1: Agricultural Land Classification and Soil Resource Survey Report [APP 243].** The management of soil and land resources during cable installation will be undertaken in accordance with the principles set out in the **Outline Soil Resources Management Plan (SRMP) [APP 280].** Cable installation will result in short term and temporary disturbance to soils and agricultural land within the cable route corridor. The assessment concludes that, with appropriate soil handling and reinstatement measures secured through the SRMP framework, land would be restored and returned to agricultural use following completion of the works.
CTC-006	Site Selection and Alternatives	Corsham Town Council (Planning) meeting on 17 March 2025: The Town Council does NOT support the idea of having to install cable to service a solar park which is 20	**ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP-056]** details the alternatives considered, including Minety Substation as an alternative point of connection to Melksham substation. The Applicant has undertaken extensive engagement with National Grid throughout the scoping and

Reference	Theme	Comments/Issues Raised	Applicant's Response
		kilometres away when there is a substation much closer to the site of the panels. The substation at Minety should be upgraded to prevent the need for extensive cabling.	development of the Scheme to determine the appropriate point of connection. The Existing National Grid Melksham Substation was identified as having available capacity for a utility scale energy project such as the Scheme. Whilst Minety substation does house 400kV infrastructure, the Applicant's discussions with National Grid confirmed there was no connection available at Minety for the Scheme. On that basis, Minety Substation is not a viable alternative and the Existing National Grid Melksham Substation remains the only viable connection point for the Scheme.
CTC-007	Transport and Access	Access points for this solar park should be fit for purpose and appropriately placed. The current proposal raised concerns for the Town Council:	The Applicant notes Corsham Town Council's comments. Details of the proposed access points are presented in Annex C and Annex D of **ES Volume 3, Appendix 13-1: Transport Assessment.** The drawings include swept-path analysis to demonstrate the access points are suitable to accommodate the required movements of construction vehicles. Where possible geometries and visibility splays have been provided in accordance with guidance. Where this is not possible, suitable traffic management has been proposed to manage the movement of construction vehicles to/from the access.
CTC-008	Transport and Access	a. that the proposal would be contrary to Policy CNP E3 of the Corsham Neighbourhood Plan	Annex B: Local Policy Accordance Tables of the Planning Statement **[APP-267]** sets out the Scheme's compliance with local planning policy, including Policy CNP E3 of the Corsham Neighbourhood Plan. Policy CNP E3 requires development to protect, conserve and where possible enhance the special qualities of the Cotswolds National Landscape and the distinctive characteristics of the landscape setting of the Corsham Rolling Lowlands (see page 916 of the **Planning Statement [APP-267]** for the full reasons why the Scheme is considered compliant with this policy). The Cable Route Corridor, as described in **ES Volume 1, Chapter 3 The Scheme [APP-055]),** is located within the Corsham Neighbourhood Plan Area and will be located underground. Therefore, there would be no impact on the

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Cotswolds National Landscape or the distinctive characteristics of the landscape setting of the Corsham Rolling Lowlands as a result of the Cable Route Corridor.
CTC-009	Socio-Economics, Tourism and Recreation	b. impacts on both residents and tourists	The Applicant has assessed matters relating to people's lives and livelihoods, including in relation to tourism and tourism-dependent businesses, in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]**, and to the population's health and wellbeing **in ES Volume 1, Chapter 18: Human Health [APP-070].** These assessments find no significant adverse effects to the population or individual receptors, including individual tourism and recreation attractions and facilities in Corsham, subject to the implementation of mitigation measures secured through the Requirements in Schedule 2 to the **Draft DCO [APP-016].**
CTC-010	Soils and Agriculture	c. impacts on agricultural land which may last for some time	The effects of the Scheme on agricultural land, including the duration of effects, are assessed in **ES Volume 1, Chapter 17: Soils and Agriculture [APP 069],** with supporting information provided in **ES Volume 3, Appendix 17 1: Agricultural Land Classification and Soil Resource Survey Report [APP 243].** The assessment confirms that land would be removed from arable rotation for the operational life of the Scheme, anticipated to be approximately 60 years. While the primary agricultural use would cease during this period, the soil resource would be retained and would continue to perform its ecological functions. The assessment notes that reduced disturbance associated with the Scheme allows soils to recover from previous intensive agricultural use, with benefits to soil structure and soil biology over time. All land would be reinstated and returned to agricultural use as far as practicable following decommissioning.
CTC-011	Transport and Access	d. disruption to country roads which are heavily used, during the construction period	**ES Volume 1, Chapter 13: Transport and Access [APP-065]** presents an assessment of highwaylinks on all proposed construction routes, including country roads, this concludes there are the impacts are temporary and not significant.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Construction vehicle movements will be managed through a Construction Traffic Management Plan. An **Outline Construction Traffic Management Plan (CTMP) [APP-287]** has been prepared and submitted with the DCO application. The aim of the CTMP is to ensure that the effect of the construction phase on the local highway network is minimised. The **Outline CTMP [APP-287]** sets out measures to coordinate construction deliveries by HGVs to arrive and depart between 09:30 and 16:30 where possible, to avoid peak network hours of 08:00–09:00 and 17:00–18:00. It also includes a community liaison element to keep local communities informed about the construction process and to provide a contact for feedback should any issues arise. Compliance with the CTMP will be monitored by the Developer, Contractor and Wiltshire Council as local highway authority. The **oCTMP [APP-287]** includes road condition surveys to ensure any damage to the highway network caused by construction traffic is identified and rectified, management of construction deliveries to avoid the requirement for HGVs generated by the Scheme passing each other in opposite directions on the local country roads, and restricted hours of deliveries outside of peak hours. The preparation, approval and implementation of the final CTMP, substantially in accordance with the outline CTMP, are secured through Requirement 15 of Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring construction traffic impacts are appropriately managed throughout the construction phase of the Scheme.
CTC-012	Site Selection and Alternatives	e. the proposed width of the construction corridor	To allow flexibility in placement of the cables which will be determined in the detailed design stage, the Cable Route Corridor is 50 m wide along the majority of its length, with an increase in width up to 665 m at a number of locations including

Reference	Theme	Comments/Issues Raised	Applicant's Response
			road and rail crossings. The construction working width will typically be 25 m wide and will narrow at hedgerow crossings. For assessment purposes, the placing of the cable anywhere within the Cable Route Corridor has been considered, but the ultimate width and spacing of the cable trenches will vary depending on environmental constraints, engineering requirements, or if crossing third party apparatus (e.g. railway lines). For further details, please see **ES Volume 1, Chapter 3: The Scheme [APP-055].** **ES Volume 3, Appendix 3-2: Cable Route Construction Method Statement [APP-183]** provides more details on how the Cable Route Corridor is to be constructed. The detailed design and construction of the cable route would be undertaken within the parameters assessed and authorised by the DCO. Measures to manage and minimise construction effects, including reinstatement of land following installation, are set out in the **Outline Construction Environmental Management Plan (CEMP) [APP-277]**.
CTC-012	Other Environmental Matters	f. fire and safety concerns	The Battery Energy Storage System (BESS) containers proposed for the Scheme will incorporate built-in safety features for fire avoidance, detection and suppression. The Scheme layout also incorporates separation distances between battery containers to ensure that any isolated fire would not become widespread or lead to a major incident. As shown on **ES Volume 2, Figure 3-1: Indicative Site Layout Plan [APP-081],** the battery containers will be located more than 200 m from the nearest PROW and 500 m from the nearest dwelling from any residential receptors. At this distance, impact to health and wellbeing from air quality, fire or explosion impacts are minimal. As such, there are no significant adverse effects to human health anticipated as a result of the Scheme, as assessed in **ES Volume 1, Chapter 18: Human Health [APP-070]**.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			The Applicant notes that the approach to BESS safety is being discussed with Dorset and Wiltshire Fire and Rescue Service (D&WFRS) and will be set out in the relevant Statement of Common Ground. An **Outline Battery Safety Management Plan (OBSMP) [APP-286]** has been prepared for the Scheme using guidance from Dorset and Wiltshire Fire and Rescue Service and incorporating recommendations of the National Fire Chiefs Council. The safety objectives for the design of the BESS site are listed in Section 2.4 of the **OBSMP [APP-286]**. The OBSMP will be amended at Deadline 1 to fully accommodate the latest BESS safety requirements contained in NFPA 855 (2026) ensuring that any credible risks associated with battery storage are either prevented or fully mitigated if a BESS failure occurs. Section 6.1.1 of the **OBSMP [APP-286]** confirms that at the detailed design stage, the selected BESS will have undertaken Large Scale Fire Testing (LSFT) to fully inform inputs for risk assessment tools which will be utilised together with detailed consequence modelling to provide a comprehensive site operations and emergency response safety audit. LSFT is a mandatory requirement under NFPA 855 (2026) safety standards to demonstrate thermal insulation protection capabilities of the BESS enclosure design, validate minimum equipment spacing distances, and demonstrate that deflagrations do not occur and/or can be safely constrained. As set out **in Outline Battery Safety Management Plan (OBSMP) [APP-286]**, the BESS Area will have a robust and validated Emergency Response Plan (ERP), developed in consultation with Dorset & Wiltshire Fire and Rescue Service at the detailed design stage. Section 5.4 of the **OBSMP [APP-286]** specifies the typical emergency response protocols, procedures and safety information that will be included in ERPs.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			ERPs will be drafted and approved for all stages of the Scheme, including construction, operation, and decommissioning. Potential effects of toxic gases arising from a BESS fire are assessed in **ES Volume 1, Chapter 15: Air Quality [APP-067]** and **in ES Volume 1, Chapter 20: Other Environmental Matters [APP-072]**, Section 20.7: Major Accidents and Disasters. An assessment of how these fumes could affect sensitive receptors within a 1 km radius of the BESS Area, including residential properties and ecological receptors, is provided in **ES Volume 1, Chapter 15: Air Quality [APP-067]**. This assessment concludes that no significant off-site impacts are predicted should a fire event occur. In the unlikely event of a fire, the precautionary measures set out in the **OBSMP [APP-286]** - including advice to remain indoors and close windows - would further reduce potential impacts to residents. The **OBSMP [APP-286]** is secured through Requirement 6 (Battery safety management) in Schedule 2 of the **Draft DCO [APP-016],** which provides that Work No. 2 must not commence until a Battery Safety Management Plan has been submitted to and approved by the relevant planning authority. The approved plan must be substantially in accordance with the Outline Battery Safety Management Plan. The Draft DCO also requires the relevant planning authority to consult with Dorset and Wiltshire Fire and Rescue Service and the Environment Agency before determining the application, and that the Battery Safety Management Plan must be implemented as approved.
CTC-013	Cultural Heritage	possible disturbance of a Roman road	The potential effects of the Scheme on the Roman Roads (i.e. the Fosse Way (HER ST88SE300) and Roman road from Bath to Speen (HER ST86NE30)), as well as other Roman archaeological assets are fully assessed in **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, supported by detailed technical appendices **in ES Volume 3, Appendices 12-1 to 12-7 [APP-219 to APP-231].**

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Where an adverse effect has been identified to Roman archaeological assets appropriate mitigation is proposed. See Section 12.9 of **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]** for embedded mitigation and Section 12.11 for additional mitigation. An overarching archaeological mitigation strategy is provided **in ES Volume 3, Appendix 12.6 Archaeological Mitigation Strategy [APP-230].** Mitigation will be secured through requirement 12 of the DCO.
CTC-014	Transport and Access	h. the uncertainty of the route	The proposed construction routes are presented **in ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]** and **ES Volume 2, Figure 13-1: Study Area: Solar PV Sites [APP-146]** and **ES Volume 2, Figure 13-2: Study Area: Cable Route Corridor [APP-147].**
CTC-015	Other Environmental Matters	i. potential long-term effects of the electromagnetic field on land and livestock	**ES Volume 3, Appendix 20-5: High-Level Electromagnetic Field Assessment [APP-262]** focusses on potential impacts upon human health rather than land and livestock however it does show that EMFs from proposed cabling will be below ICNIRP reference thresholds at all locations above ground. NPS EN-5 states "*There is little evidence that exposure of crops, farm animals or natural ecosystems to transmission line EMFs has any agriculturally significant consequences*." EMFs would only occur whilst cables are in-situ and live and EMFs would cease to occur once the Scheme ceases operation.
CTC-016	Decommissioning and Construction	j. emergency access during the construction phase	With exception of the one-off AIL movements, no road closures are proposed. The impact on Driver delay is negligible as shown in Table 13-27 in **ES Volume 1, Chapter 13: Transport and Access [APP-065].** Emergency access will not be affected by the Scheme.
CTC-017	Soils and Agriculture	With further objections added at its meeting on 3 December 2025, on the grounds of: • Agricultural land and highways damage during and after the cabling installation	The effects of cabling works on agricultural land, including construction and post construction reinstatement, are assessed in **ES Volume 1, Chapter 17: Soils and Agriculture [APP 069]**, with supporting agricultural land classification and soil survey information provided in **ES Volume 3, Appendix 17 1:**

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Agricultural Land Classification and Soil Resource Survey Report [APP 243]. Soils affected by cable installation will be managed in accordance with the principles set out in the **Outline Soil Resources Management Plan (SRMP) [APP 280]**. The Outline SRMP identifies appropriate soil handling windows with regard to rainfall and soil moisture conditions and sets out best practice methods for handling, storage and replacement of soils to minimise the risk of damage and compaction. Following installation of the cabling, soils will be replaced promptly within the cable trenches, ensuring agricultural land is reinstated after only a short term disturbance, as detailed in paragraphs 1.7.3 and 1.8.27 of the **Outline Soil Resources Management Plan (SRMP) [APP 280],** secured by Requirement 17 in Schedule 2 to the **Draft DCO [APP-016]**. The effects of construction traffic on the local highway network, including construction traffic associated with the construction of the cable route, are assessed in **ES Volume 1, Chapter 13: Transport and Access [APP-065]**, which considers construction vehicle routing, traffic volumes and potential impacts on highway safety and road condition. The assessment concludes that, with appropriate management measures in place, construction traffic effects can be appropriately controlled. Mitigation measures to manage construction traffic and protect local roads are set out in the **Outline Construction Traffic Management Plan (CTMP) [APP-287]**. The CTMP has been developed to minimise impacts on the local highway network and includes measures for routing, scheduling of deliveries and liaison with the local highway authority. A road condition and dilapidation survey of minor roads not typically used by HGV traffic is included as a measure within the

Reference	Theme	Comments/Issues Raised	Applicant's Response
			CTMP. Any damage to verges or carriageway surfaces caused by construction vehicles will be rectified to the satisfaction of the local highway authority. The preparation, approval and implementation of the final CTMP, substantially in accordance with the outline CTMP, are secured through Requirement 15 of Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring construction traffic impacts, including potential damage to local roads, are appropriately managed throughout the construction phase of the Scheme.
CTC-018	Socio-Economics, Tourism and Recreation	• An adverse impact on road traffic causing detrimental affects on businesses.	The assessment of traffic impacts associated with the Scheme is set out in **ES Volume 1 Chapter 13: Transport and Access [APP-065],** identifying no significant adverse effects to road user safety or delay during construction. As such, it is not anticipated there will be any significant adverse effects to businesses as a result of road traffic. However, a potential 'medium' impact has been considered as a worst-case scenario to tourism-dependent businesses in the Corsham area **in ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** and the **supporting ES Volume 3 Appendix 16-2 Tourism and Recreation Receptor Tables [APP-241]** as a result of the combination of increased HGV traffic and views of construction works on approach routes. This however is not anticipated to have any significant adverse effects on businesses, subject to implementation of transport mitigation measures as secured through **the OCTMP [APP-287]** by Requirement 15 in Schedule 2 to the **Draft DCO [APP-016**].

5.5 Biddestone & Slaughterford Parish Council

Table 5-5 RR-0504

Reference	Theme	Comments/Issues Raised	Applicant's Response
BSPC-001	Description and DCO Process	Objection to Lime Down Solar Park – From Biddestone and Slaughterford Parish Council. On behalf of Biddestone and Slaughterford Parish Council, I wish to submit a formal objection to the proposed Lime Down Solar Park. While the Council supports renewable energy in principle, this proposal raises serious concerns due to:	The Applicant notes Biddestone and Slaughterford Parish Council's objection and has responded to the comments in full below.

BSPC-002	Landscape and Visual	Its proximity to and visibility from the Cotswolds Area of Outstanding Natural Beauty (AONB), a nationally protected landscape to which Section 85 of the Countryside and Rights of Way Act 2000 applies. The development would have a significant adverse visual and environmental effect on the setting of the AONB.	Consultation with the Cotswolds National Landscape (CNL) Board has been carried out and it is agreed that Sites A, B and C are within the setting of the CNL. The Scheme has been designed sensitively to avoid harm to the CNL. Following the mitigation hierarchy, avoidance measures have been the primary way of avoiding harm. These measures are set out in Section 8.9 of **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]** and include:
			
			• The removal of panels within the setting of the CNL in Sites A, B and C where there is a strong visual relationship between the CNL and the Scheme. This includes:
			  ○ Site A: The northern part of A1, A11 and A12;
			  ○ Site B: B12; and
			  ○ Site C: C1, C6, C8, part of C9 and the majority of C10.
			  ○ Panels in C2, C3 and C4 which are not on the boundary of the CNL, but where significant visual effects on receptors within the CNL were recorded at PEIR and subsequently removed from the Scheme following Statutory Consultation.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			The Cotswolds National Landscape (CNL) is fully assessed as a standalone receptor within **ES Volume 3, Appendix 8.6: Assessment of Effects on the Special Qualities of the Cotswolds National Landscape [APP-197]**. This assessment considers the effects of the Scheme on landscape character, visual amenity and the special qualities of the CNL, including tranquillity. The assessment found that there would be some short term harm to landscape character within the setting of the CNL but due to the avoidance measures embedded within the Scheme, harm to the CNL itself would be minimal with beneficial effects in the long term which would further the purposes of the designation. In respect of visual amenity, some short-term adverse effects would be experienced by a small number of visual receptors with views to and from the CNL. However, these would reduce over time, as a result of the proposed mitigation. All land parcels adjacent to the CNL are proposed to deliver habitat enhancement, informed by the CNL Management Plan and the Cotswolds National Landscape Strategy and Guidelines, to further the purposes of the designation. Details of the proposed landscape and ecological mitigation and enhancement measures are provided in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060], Figure 3-4-1 to 3-4-5.2 Landscape and Ecology Mitigation Plan [APP-084]** and the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283],** and the **Outline Ecological Protection and Mitigation Strategy (EPMS) [APP-284]**. The preparation, approval and implementation of the detailed Landscape and Ecological Management Plan, substantially in accordance with the **OLEMP [APP-283]**, are secured through Requirement 7 in Schedule 2 of the Draft Development Consent Order [APP-016]. The preparation, approval and implementation of the detailed Ecological Protection and Mitigation Strategy,

Reference	Theme	Comments/Issues Raised	Applicant's Response
			substantially in accordance with the **EPMS [APP-284]**, are secured through Requirement 8 in Schedule 2 of the **Draft Development Consent Order [APP-016]**. These requirements ensure that the identified mitigation and enhancement measures are delivered and maintained throughout the lifetime of the Scheme. The Applicant has consulted with the CNL board regarding Section 85 of the Countryside and Rights of Way Act 2000 and how the Scheme proposes to further the purposes of the CNL. Refer to the standalone Assessment on the CNL and its Special Qualities in **Appendix 8-6 [APP-197].**
BSPC-003	Landscape and vVsual	We understand that the strengthened "*seek to further*" duty introduced by Section 245 of the Levelling-Up and Regeneration Act 2023 has been in force since 26 December 2023, and now legally requires all relevant authorities in England—including the Planning Inspectorate and Secretary of State for NSIPs—to actively seek to further the conservation and enhancement of the Cotswolds National Landscape when exercising any function affecting it .	The duty introduced by s245 of the Levelling-up and Regeneration Act 2023 has been considered by the Applicant and further details of its application to the Scheme are set out in **ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP-056]**. Further, in line with the duty imposed by s245, the Applicant has carried out an assessment of the effects of the Scheme on the Cotswolds National Landscape (CNL) which is set out in **ES Volume 3, Appendix 8-6: Assessment of Effects on the Cotswolds National Landscape and its Special Qualities [APP-197]** and concludes that there are no significant direct effects on the CNL or its special qualities**.** The landscape and visual effects of the Scheme on the CNL and its special qualities have been mitigated throughout the landscape-led, iterative design process in consultation with officers at the CNL Board and Wiltshire Council.
BSPC-004	Soils and Agriculture	The loss of Best and Most Versatile agricultural land, ALC grades 1,2 and 3a, which undermines national food security and contradicts planning guidance that seeks to protect productive farmland where alternatives exist.	The effects of the Scheme on agricultural land, including land quality and productivity, are assessed in **ES Volume 1, Chapter 17: Soils and Agriculture [APP-069]**, supported by **ES Volume 3, Appendix 17-1: Agricultural Land Classification and Soil Resource Survey Report [APP-243]**. That assessment identifies that the majority of agricultural land affected is not Best and Most Versatile (BMV) land, comprising predominantly

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Subgrade 3b and Grade 4 land, which is not considered high-quality agricultural land in planning terms. Government-led agricultural initiatives, such as the Sustainable Farming Incentive which is relaunching later in 2026, have prioritised soil health, environmental enhancement and climate resilience, recognising that long-term food security is influenced by a range of factors beyond land take alone, including soil condition, climate change and environmental pressures. The Scheme allows soils to remain in situ and undisturbed during operation, supporting soil recovery and long-term land health, with land reinstated and returned to agricultural use as far as practicable following decommissioning. No permanent loss of agricultural land is anticipated. The Applicant does not consider that food security will be compromised by the Scheme (or solar energy more widely). The latest figures to September 2024 indicate that solar occupied around 21,200 ha of agricultural land in the UK. In 2025, 545,000 ha of arable land in England were left uncropped (source: Department for Environment, Food & Rural Affairs, Agricultural land use in England at 1 June 2025). It should also be noted that food security is not identified as an issue within the suite of Energy National Policy Statements or the National Planning Policy Framework (NPPF). Further, the Government's UK Solar Roadmap (2025) states that solar development is not considered to compromise food security, but that the climate and nature crisis poses the greatest long-term risk to food security- a risk which the Scheme directly helps to address by providing a secure, low-carbon source of electricity. As set out in Section 2 of the **Outline Decommissioning Strategy [APP-279],** post-decommissioning of the Scheme, the

Reference	Theme	Comments/Issues Raised	Applicant's Response
			landowners would choose how the land is to be used and managed. The landowner may return all of the land to arable use, although it is likely that established habitats such as hedgerows and woodland would be retained given their potential benefits to agricultural land and the wider farming estate. Whilst there is an environmental and economic cost to importing food, and it is recognised the UK imports a far greater amount of food than it exports, the impact of the Scheme on food import requirements or the food and drinks economy is not material at a national scale and has therefore not been assessed. The **Planning Statement [APP-267]** provides further detail on how BMV agricultural land has been considered against planning policy and why its inclusion within the Scheme is justified. This is in line with planning policy which does not prohibit solar development on BMV land (NPS EN-3 paragraph 2.10.30) and states that while land type should not be a predominating factor in determining a site's suitability for solar development, poorer quality land should be preferred and BMV land avoided where possible (NPS EN-3 paragraph 2.10.29) . The consideration of alternatives, including the availability and suitability of land of lower agricultural quality, is set out in **ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP 056]** and **ES Volume 3, Appendix 4 1: Site Selection Assessment Report [APP 185]**. This assessment explains how alternative sites, including areas of brownfield land and lower grade agricultural land, were considered in accordance with planning policy, but were deemed unsuitable for development. In particular, the Applicant's site selection process initially excluded ALC grades 1, 2 and 3 in the first sift for potential development areas, in order to concentrate on non-BMV land. Brownfield land was also considered at stage 3 of the assessment. The initial potential development areas were not considered viable for

Reference	Theme	Comments/Issues Raised	Applicant's Response
			development, and therefore Grade 3 agricultural land was then considered. Grade 1 and 2 agricultural land remained broadly excluded from the Applicant's area of search and were only considered when sections of Grade 1 and 2 agricultural land were included within broader land parcels that were identified as potentially available.
BSPC-005	Cultural Heritage	Harm to designated heritage assets, including the setting of the Fosse Way (a scheduled monument) and Bradfield Manor (Grade I listed), contrary to the NPPF and statutory protections.	As detailed in Section 12.3 of **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, the cultural heritage assessment follows appropriate legislation, policy and guidance including the overarching NPS for Energy (EN-1) (January 2024), NPS for Renewable Energy Infrastructure (EN-3) (January 2024), the Wiltshire Core Strategy (2015), as well as guidance provided by Historic England and the Chartered Institute for Archaeology. The potential effects of the Scheme on the Roman Roads (i.e. the Fosse Way), as well as other Roman archaeological assets are fully assessed **in ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, supported by detailed technical appendices **in ES Volume 3, Appendices 12-1 to 12-7 [APP-219 to APP-231]**. Where an adverse effect has been identified, mitigation is proposed. See Section 12.9 of **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]** for embedded mitigation and Section 12.11 for additional mitigation. An overarching archaeological mitigation strategy is provided in **ES Volume 3, Appendix 12.6 Archaeological Mitigation Strategy [APP-230]**. Mitigation will be secured through requirement 12 of the DCO. **ES Volume 1, Chapter 12: Cultural Heritage [APP-064],** supported by **ES Volume 3, Appendix 12.1: Heritage Statement [APP-219]**, identified that there would be a moderate / minor (not significant) adverse effect to Bradfield Manor Farmhouse (less than substantial harm at the lower end in NPPF terms) as a result of indirect (i.e. setting) impacts.
BSPC-006	Cumulative Effects	The cumulative impact of these harms fail to meet the thresholds set out in	A comprehensive Cumulative and In-Combination Effects Assessment has been undertaken in accordance with Planning

Reference	Theme	Comments/Issues Raised	Applicant's Response
		relevant policy and legislation. We respectfully urge the Secretary of State to refuse development consent.	Inspectorate Advice Note 17 and the relevant NPS EN-1, NPS EN-3 and NPS EN-5 requirements which are set out within Environmental Statement **Chapter 21: Cumulative and In-Combination Effects [APP-073]** and **Appendix 21-1 Long List of In-Combination Effects and Cumulative Developments [APP-264]**. In combination effect interactions during the construction, operation and decommissioning phase do not increase the significance of effects of the Scheme. No significant inter project cumulative effects are identified other than Skylark at a District Level during the operational phase and on four PRoWs and Corsham Park (tourism and recreation) during the construction phase. Refer also to responses to the CAWS Relevant Representation for further detailed responses on cumulative effects.

5.6 Langley Burrell Without Parish Council

Table 5-6 RR-2721

Reference	Theme	Comments/Issues Raised	Applicant's Response
LBWPC-001	Description and DCO Process	The Parish Council will be submitting a comprehensive letter of objections to this proposal. These will include the overall size and scale of the project. The significant negative impact on the rural scene and landscapes, the surrounding village settings, ecology and biodiversity, hydrology, flood risk and drainage, soils and agriculture, noise and vibration, cultural heritage, transport, highways and socio-economics, tourism and recreation all to be balanced against the potential gains of renewable energy generation and carbon reduction. In addition the concentration of solar farms, battery storage and associated infrastructure within the County of Wiltshire that represents a significant cumulative impact and industrialisation of the countryside destroying food production and the farming industry	The Applicant notes the Council's intention to submit a detailed letter of objections covering a range of topics including landscape and visual effects, setting, ecology and biodiversity, hydrology and flood risk and drainage, soils and agriculture, noise and vibration, cultural heritage, transport, socio-economics, tourism and recreation, as well as concerns relating to cumulative development and the scale of the Scheme. The Applicant confirms that these matters have been assessed as part of the Environmental Impact Assessment (EIA) and are reported within the Environmental Statement (ES), including **ES Volume 1, Chapter 8: Landscape and Visual [APP-060], ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061], ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [APP-063], ES Volume 1, Chapter 14: Noise and Vibration [APP-066], ES Volume 1, Chapter 12: Cultural Heritage [APP-064], ES Volume 1, Chapter 13: Transport and Access [APP-065], ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** and **ES Volume 1, Chapter 21: Cumulative and In-Combination Effects [APP-073].** The Applicant's **Statement of Need [APP-266]** provides evidence that an unprecedented capacity of new low-carbon generation schemes is urgently needed for the UK to meet its legally binding climate change targets. The government has confirmed that solar energy is at the heart of the Clean Power 2030 Mission [NPS EN-3 (2025) Paras 2.10.1 & 2.10.2]. The Statement of Need confirms that the need for the Scheme is urgent and that substantial weight should be given to the need for the Scheme [NPS EN-1 (2023) Para 3.2.9-3.2.10]. The Applicant is confident that the proposed management and mitigation measures set out in the **Environmental Statement [APP-052 to APP-265]** are comprehensive

Reference	Theme	Comments/Issues Raised	Applicant's Response
			and robust and that the Scheme aligns with national and local planning policy; this is outlined in the **Planning Statement [APP-267]**. Of particular relevance are Annex A: National Policy Statement Accordance Tables and Annex B: Local Policy Accordance Tables, of the Planning Statement which set out an appraisal of the Scheme against national and local planning policies. The Applicant recognises that the Council intends to provide further detailed submissions on these matters. The Applicant will continue to engage constructively with stakeholders throughout the Examination and will respond to issues raised through the formal Examination process.

5.7 Nettleton Parish Council

Table 5-7 RR-3443

Reference	Theme	Comments/Issues Raised	Applicant's Response
NPC-001	Transport and Access	Are the predicted traffic flows credible?	The Applicant has predicted construction traffic flows for the Scheme based on a realistic breakdown of construction materials, such as aggregate and number of modules. Calculations are provided in Annex E of **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]**. Further detail of trip generation will also be added to **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]** and an updated version submitted at Deadline 1 of Examination. The transport and access assessment has been completed by competent experts, as detailed in **ES Volume 3, Appendix 1-1: Statement of Competence [APP-180]**, and is considered to be a robust assessment of the Scheme.
NPC-002	Noise and Vibration Transport and Access Human Health	The impact on residents and vibration to houses foundations in Burton due to the increase of HGV's. Danger to children waiting for school bus.	The B4039 route through Burton is a B-Road and is suitable for carrying HGV traffic. There are no HGV restrictions along this route and it is currently used by HGVs. Evidence indicates that vibration from the passing of HGVs, even on a relatively poor road surface, is likely to be negligible. The following document presents a summary of such evidence: Appendix 12.9 of the Lower Thames Crossing Environmental Statement. The types of vibration effects from HGV's are the same as for this Scheme (being from HGV movements generally). As such, operational traffic vibration has been scoped out of the ES. This has been agreed as acceptable by the planning inspectorate as summarised in Table 14-1 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**. The assessment of traffic impacts associated with the Scheme is set out in **ES Volume 1, Chapter 13: Transport and Access [APP-065]** which identifies no significant adverse effects to non-vehicular road user safety, delay, or fear and intimidation during construction. Supporting technical evidence is provided in **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]**,

Reference	Theme	Comments/Issues Raised	Applicant's Response
			which includes an assessment of baseline accident data and predicted changes in collision risk arising from construction traffic. As such, there is no respective significant adverse effect to human health and wellbeing as a result of transport and connections as assessed in **ES Volume 1, Chapter 18: Human Health [APP-070]**. Furthermore, the Applicant has committed to limiting HGV movements during construction to the hours of 09:30 to 16:30 on weekdays, substantially reducing the likelihood of HGV movements coinciding with morning school movements. Mitigation measures to manage construction traffic safely are set out in the **Outline Construction Traffic Management Plan [APP-287]**, which includes defined vehicle routing, delivery scheduling and coordination with the local highway authority. The preparation, approval and implementation of the final CTMP, substantially in accordance with the outline CTMP, are secured through Requirement 15 of Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring construction traffic is managed safely throughout the construction phase of the Scheme.

5.8 Castle Combe Parish Council

Table 5-8 RR-0645

Reference	Theme	Comments/Issues Raised	Applicant's Response
CCPC-001	Transport and Access	The site comprises a network of villages, hamlets, farms, rights of way, and productive agricultural fields that maintain the distinct identity of multiple rural communities.	The Applicant acknowledges that there will be impacts on the community as a result of the Scheme, which may be a source of concern for local residents. The Secretary of State will balance those potential impacts and changes against the urgent need and critical national priority for the Scheme as set out in Government policy. The Applicant has assessed adverse impacts arising from the Scheme and has also set out within the **Environmental Statement [APP-052 – APP-065]** the steps taken to avoid, mitigate and minimise these impacts as far as possible, and has prepared a number of management plans that will ensure that impacts are kept to a minimum. These management plans are secured in the **Draft Development Consent Order [APP-016]**. Of particular relevance to the assessment of effects on local communities are **ES Volume 1, Chapter 8: Landscape and Visual [APP-060], Chapter 13: Transport and Access [APP-065], Chapter 14: Noise and Vibration [APP-066], Chapter 15: Air Quality [APP-067], Chapter 16: Socioeconomics, Tourism and Recreation [APP-068],** and **Chapter 18: Human Health [APP-070],** all of which consider potential impacts on residential properties and local communities.
CCPC-002	Landscape and Visual	The development is industrial in scale, covering 2,000 to 3,000 acres of agricultural land and placing major infrastructure - including a Battery Energy Storage System (BESS), substation, and solar arrays - just 300 metres from homes.	A buffer of at least 50m from solar arrays to the curtilage of all residential properties has been incorporated into the layout of the Scheme to protect visual amenity. The Scheme has been designed to deliver the greatest possible benefit from the available land and the available grid connection, whilst avoiding, minimising and/or mitigating harmful environmental effects. As per the description set out in **ES Volume 1, Chapter 3: The Scheme [APP-055]** the total area within the DCO Order Limits encompasses approximately 1,237 hectares (ha). Of this, the 'Solar PV Sites' comprise approximately 749.1 ha of land.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Around 479.5 ha of this land is proposed as being required for installation of solar PV, battery storage, and associated infrastructure. The remaining 269.5 ha would provide areas dedicated to ecological mitigation, measurable Biodiversity Net Gain (BNG) delivery, landscaping, offsets and agricultural land managed for environmental enhancement and habitat creation. The Cable Route Corridor, which stretches approximately 22 km from 'Lime Down D' to Melksham Substation and links together the Solar PV Sites, covers approximately 463.2 ha. Approximately 17.8 ha (of which 5.9 ha overlap with the Cable Route Corridor) is proposed for Highway Improvement Areas within which improvements to sections of the existing highway network will be completed to facilitate access to the Scheme, such as improvements to road edge and traffic management. Work will be undertaken by the Applicant and National Grid within the Existing National Grid Melksham Substation, requiring a total area of 12.8 ha. The Applicant acknowledges that there will be impacts on the community as a result of the Scheme, which may be a source of concern for local residents. The Secretary of State will balance those potential impacts and changes against the urgent need and critical national priority for the Scheme as set out in Government policy. The Applicant has assessed adverse impacts arising from the Scheme and has also set out within the Environmental Statement [**APP-052 – APP-065**] the steps taken to avoid, mitigate and minimise these impacts as far as possible, and has prepared a number of management plans that will ensure that impacts are kept to a minimum. These management plans are secured in the **Draft Development Consent Order [APP-016]**. Of particular relevance to the assessment of effects on local communities are **ES Volume 1, Chapter 8: Landscape and**

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Visual [APP-060], Chapter 13: Transport and Access [APP-065], Chapter 14: Noise and Vibration [APP-066], Chapter 15: Air Quality [APP-067], Chapter 16: Socioeconomics, Tourism and Recreation [APP-068], and Chapter 18: Human Health [APP-070], all of which consider potential impacts on residential properties and local communities. The Applicant remains committed to delivering a Scheme that makes a meaningful contribution to the UK's transition to net zero, while also seeking to minimise adverse impacts and maximise opportunities for environmental enhancement and community benefits.
CCPC-003	Other Environmental Matters	The applicant has not demonstrated how a major incident could be contained. The siting so close to homes and critical infrastructure is wholly inappropriate and represents an unacceptable and unmanageable risk to public safety	As a result of updated Scheme design for DCO submission, BESS infrastructure is proposed more than 500 m away from the nearest dwelling (refer to **ES Volume 3, Appendix 15-2 BESS Fire Emissions Modelling [APP-239]**). As such, there are no significant adverse effects to human health anticipated as a result of the Scheme, as assessed in **ES Volume 1, Chapter 18: Human Health [APP-070].** The location of the Battery Energy Storage System (BESS) has been informed by a detailed site selection and design evolution process, as set out in **ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP-056].** This chapter explains that land at Lime Down D was identified as an appropriate location due to its proximity to the solar PV arrays and the on-site substation, providing operational benefits including minimising transmission losses, maximising storage efficiency, and enabling rapid and reliable grid response. In considering options for co-locating the BESS with the solar PV Sites, Lime Down D was selected as the preferred location due to its central position within the Scheme, effective natural and proposed screening, limited proximity to residential properties, and closeness to existing infrastructure corridors,

Reference	Theme	Comments/Issues Raised	Applicant's Response
			including the railway line. Locating the BESS within an existing infrastructure corridor reduces the need for additional land take and avoids introducing new isolated infrastructure into undeveloped areas. The assessment concludes that siting the BESS at Lime Down D presents the lowest potential for significant adverse environmental effects. Accordingly, the proximity of the BESS to the railway line does not give rise to significant safety or environmental concerns. The Applicant has followed National Fire Chiefs Council (NFCC) guidance and commissioned a Plume Assessment Study to model toxic gas emissions and visibility impacts from a BESS fire on all sensitive receptors within a 1km radius of the BESS area. The fire emissions modelled in the report were based upon recent UK Health Security Agency (UKHSA) requests for DCO BESS projects which explore both immediate air quality impacts together with annual UK air quality requirements. Six worst case BESS fire locations (i.e. locations within the BESS Area closest to sensitive receptors) have been modelled as depicted in **ES Volume 2, Figure 15-5: Battery Energy Storage System Fire Emissions Study Area [APP-166]**. The Concentrations of carbon monoxide (CO), formaldehyde, hydrogen chloride (HCl), hydrogen cyanide (HCN), hydrogen fluoride (HF), ammonia (NH_3), nitrogen dioxide (NO2) and particulates from a potential BESS fire have been modelled using an air quality dispersion model to determine the likely effects on human health. A high-level visibility assessment has also been undertaken using the modelled particulates results to determine the effect of BESS fire emissions on visibility on the local road and rail network to inform the **Outline Battery Safety Management**

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Plan (OBSMP) [APP-286]. The Plume Assessment Study has concluded that there are no significant toxic emission or visibility impacts at all sensitive receptor locations. The Applicant has also committed to commissioning an additional Plume Analysis Study at the detailed design stage as stipulated in Section 5.5.9 of the OBSMP and secured through Requirement 6 of the **Draft DCO [APP-016].** As now mandated under NFPA 855 (2026), the Applicant will only be able to select a BESS system that has undertaken Large Scale Fire Testing (LSFT). At the detailed design stage, the selected BESS LSFT data will be leveraged to fully inform inputs for risk assessment tools which will be utilised together with detailed consequence modelling to provide a comprehensive site operations and emergency response safety audit, this is stipulated in the **OBSMP [APP-286]** pre-construction requirements. Section 5 of the **OBSMP [APP-286]** covers all requisite firefighting requirements for the Scheme including fire service access, firefighting water supply, and emergency planning requirements. The Applicant notes that the approach to BESS safety is being discussed with Dorset & Wiltshire Fire & Rescue Service (D&WFRS) and this will be set out in the relevant Statement of Common Ground.
CCPC-004	Noise and Vibration	Noise emissions, visual intrusion, and operational lighting would permanently destroy the tranquillity of the area.	The noise impacts from the operation of the Scheme and its components are assessed in Section 14.10 **of ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**, with supporting modelling provided in **ES Volume 3, Appendix 14-4: Noise Modelling [APP-237].** A penalty has been applied to predicted

Reference	Theme	Comments/Issues Raised	Applicant's Response
			noise levels from the Solar PV Sites to account for the distinctive nature of the sound. Potential mitigation measures are detailed in Section 14.9 **of ES Volume 1, Chapter 14: Noise and Vibration [APP-066],** and with such measures in place, significant effects from operational noise are not expected. As shown in Table 8 **of ES Volume 3, Appendix 14-4: Noise Modelling [APP-237],** levels would typically be below or slightly above the existing background sound in the area. The **Outline Operational Environmental Management Plan [APP-278]** commits to noise levels from the Scheme at residential dwellings being the same as or below those modelled in the ES. This provides assurance that significant effects from operational noise will be avoided, while allowing flexibility in how this is achieved. The preparation, approval and implementation of the detailed OEMP, substantially in accordance with the outline plan, are secured through Requirement 14 of Schedule 2 of the **Draft Development Consent Order [APP-016],** ensuring operational noise is appropriately controlled throughout the lifetime of the Scheme. An assessment of landscape and visual effects is provided in the Landscape and Visual Impact Assessment (LVIA) presented in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**. The LVIA assesses effects on identified landscape and visual receptors, including residential properties and users of public rights of way, and identifies where significant effects may occur. The LVIA found no significant long term visual effects to Residential Properties as a consequence of the Scheme.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			The scale of development within the Order Limits has been significantly reduced from the layout assessed in the Preliminary Environmental Information Report (PEIR) through an iterative design process undertaken in response to consultation and in accordance with the mitigation hierarchy to avoid, reduce and mitigate adverse effects. As part of this design evolution, panels along the edge of the Cotswolds National Landscape and along the Fosse Way have been removed. Mitigation measures to address landscape and visual effects are set out in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**, **Figure 3-4-1 to 3-4-5.2 Landscape and Ecology Mitigation Plan [APP-084]** and detailed within the **Outline Landscape and Ecological Mitigation Plan (LEMP) [APP-283]** and the **Outline Ecological Protection and Mitigation Strategy (EPMS) [APP-284]**. These documents include proposals for new and enhanced planting, retention of existing hedgerows and woodland, and landscape integration measures to reduce visual effects over time. In addition, the Scheme design incorporates minimum offsets from existing landscape features, including residential properties, ancient woodland, woodland, hedgerows, public rights of way and watercourses, to further limit visual impacts. The preparation, approval and implementation of detailed landscape and ecological management plans, substantially in accordance with the **OLEMP [APP-283]** and **EPMS [APP-284]**, are secured through requirements in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that the identified mitigation measures are delivered and maintained throughout the lifetime of the Scheme.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Potential effects relating to lighting are assessed in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**, which considers the implications of construction, operational and decommissioning lighting on landscape and visual receptors. The Landscape and Visual Impact Assessment (LVIA) has considered the construction, operational and decommissioning lighting proposals for the Scheme, with details of lighting design, directionality and intermittent lighting set out in **ES Volume 1, Chapter 3: The Scheme [APP-055]**. The Scheme has been designed to minimise the need for external lighting. Lighting is not required within the Solar PV Arrays during the operational phase. Motion-sensing security lighting will be provided within substations and the BESS Area and will be used only for maintenance and security purposes. Temporary site lighting during construction and decommissioning will be required to enable safe working during hours of darkness. This lighting will be designed, as far as reasonably practicable, to minimise light spill outside the Site and Cable Route Corridor, particularly towards residential properties, highways and ecological receptors. Standard good practice measures will be employed to minimise glare and light spill during construction, operation and decommissioning. There will be no lighting on perimeter fencing. Measures to control construction lighting are set out in the **Outline Construction Environmental Management Plan [APP-277]**, and operational lighting controls form part of the **Outline Operational Environmental Management Plan [APP-278]**. The preparation, approval and implementation of detailed management plans, substantially in accordance with these outline plans, are secured through requirements in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring

Reference	Theme	Comments/Issues Raised	Applicant's Response
			lighting impacts are appropriately controlled throughout the lifetime of the Scheme.
CCPC-005	Transport and Access	The construction traffic proposals rely on narrow rural lanes that are physically incapable of safely accommodating the volume of HGVs required. Independent analysis shows the applicant has underestimated traffic by over 40%. This creates an unacceptable and unmanageable safety risk, particularly where there are no pavements, limited verges, blind bends, and multiple public rights of way	The assessment presented in Annex H of **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]** demonstrates adequate carriageway width or frequency of passing place opportunity to pass at least an HGV and a light vehicle as requested in comments provided by Wiltshire Council in its response (August 2025) to the Transport Assessment Scoping Note and confirmed in RR4934 Paragraph 4 of 'Appendix A - Highways and Transport Document Review - Detailed Comments'. This confirms that no passing bay or widening improvements are needed to accommodate these movements on the construction route outside of the Order Limits. The distances between passing points outside of the Order Limits are all within 150 m with forward visibility extending to the next passing point and beyond. This is within the generally accepted distance of 200 metres. As set out in the **OCTMP [APP-287]**, a booking system will be set up to manage arrivals and departures to the Order Limits. This will be implemented in coordination with banksmen, which will be able to hold back any cross-over, should there be any delays on the roads. This will prevent HGVs generated by the Scheme passing each other in opposite directions on the local roads forming part of the construction routes (including this route) and will be confirmed as part of the final CTMP. Excessive widening of existing rural routes to allow two HGVs to pass would be over engineering, because of the following reasons: • temporary nature of the construction period; • trip generation of is an estimate of the deliveries on a peak day, so does not represent a daily average;

Reference	Theme	Comments/Issues Raised	Applicant's Response
			• trip generation is based on the worst-case assumptions, including but not limited to, all phases and Solar PV Sites being constructed simultaneously and a 50% uplift; • delivery times during the construction phase are limited to those times set out in the **OCTMP [APP-287]**. There will be no HGV construction trips outside of these hours; and • there would be a much greater impact on hedgerow, trees and character. To provide further comfort, additional information has been added to **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]** which will be submitted at Deadline 1 of Examination. This demonstrates that there is adequate carriageway width and/or passing place opportunity for two HGVs. Further detail of trip generation has also been added to **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]** which will be submitted at Deadline 1 of Examination. The Applicant notes that independent analysis of construction HGV trip generation has not been provided so is unable to comment on this at this stage.
CCPC-006	Landscape and Visual	We object to the environmental and landscape harm caused by industrial fencing, large scale visual structures, and the fragmentation of wildlife habitats. The proposal contradicts local and national Landscape Recovery objectives by creating impermeable barriers that block natural wildlife movement and erode the rural character of the area.	Potential effects of boundary treatments and fencing on ecology and wildlife movement are assessed in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061],** which considers impacts on habitats and species during construction, operation and decommissioning and identifies measures to avoid or mitigate barriers to wildlife movement. The Scheme design incorporates fencing around the Solar PV Sites that is permeable to wildlife, with the exception of deer. This means animals (excluding deer only) will be able to freely

Reference	Theme	Comments/Issues Raised	Applicant's Response
			access habitats within the Solar PV Sites without the need for wildlife gates. In addition, wide buffers are retained around the peripheries of the Solar PV Sites to allow wildlife, including deer, to move between favoured habitats. These measures are described **in ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]** and detailed in the **Outline Ecological Protection and Mitigation Strategy (OEPMS) [APP-284]**.
CCPC-007	Socio-Economics, Tourism and Recreation	This is a regional loss of amenity, affecting thousands of people who walk, cycle, ride, and enjoy this landscape as part of their daily lives. The proposal would erase the rural qualities that bind these communities together and define this part of the South Cotswolds. We strongly object to the proposal.	The Applicant has aimed to provide a robust assessment of impacts to tourism and recreation in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068**], while impacts to the social environment, on amenity, and access to the countryside for leisure have been assessed in **ES Volume 1, Chapter 18: Human Health [APP-070],** with reliance on **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**. The Applicant confirms that the majority of significant adverse effects can be mitigated, however, the assessment identifies residual significant adverse effects to a small number of PROWs and unsurfaced highways during construction, and to long-distance recreation routes during all phases of the Scheme (due to their regional or national importance). The assessment of human health impacts identifies no residual significant adverse effects. The assessment in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** and the **supporting ES Volume 3 Appendix 16-2 Tourism and Recreation Receptor Tables [APP-241]** have assessed the likely impacts of the Scheme at construction, operation, peak replacement, and decommissioning on tourism and recreation receptors, including all PROWs within 2 km of the Scheme. Assessment of the likely impact on the Cotswolds National Landscape has been considered separately as both a landscape and visual impact in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**, and as a tourism destination in in **ES Volume 1, Chapter 16: Socio-Economics,**

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Tourism and Recreation [APP-068]. The assessment in ES Chapter 16 concludes that there is no residual significant adverse effect to the Cotswolds National Landscape as a tourism destination.
CCPC-008	Soils and Agriculture	We are concerned about the loss of farm land.	The effects of the Scheme on agricultural land, including the duration of effects, are assessed in **ES Volume 1, Chapter 17: Soils and Agriculture [APP 069]**, with supporting information provided in **ES Volume 3, Appendix 17 1: Agricultural Land Classification and Soil Resource Survey Report [APP 243]**. The assessment confirms that land would be removed from arable rotation for the operational life of the Scheme, anticipated to be approximately 60 years, but would not be permanently lost. While the primary agricultural use would cease during this period, the soil resource would be retained and would continue to perform its ecological functions. Reduced disturbance associated with the Scheme allows soils to recover from previous intensive agricultural use, resulting in long term benefits to soil structure and soil biology. All land would be reinstated and returned to agricultural use as far as practicable following decommissioning.
CCPC-009	Noise and Vibration	The disruption to residents on noise and travel while it is being built.	The noise and vibration impacts arising from construction activities are assessed in Section 14.10 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**. For the purposes of the assessment, a reasonable worst-case scenario assuming piling activities has been considered. Mitigation measures associated with construction activity are presented in Section 14.9 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]** and are committed to through the **Outline Construction Environmental Management Plan [APP-277]**. With these measures in place, the assessment concludes that no significant effects from construction noise or vibration are expected. A noise monitoring programme agreed with Wiltshire Council will be carried out during construction. The preparation, approval and implementation of the

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Construction Environmental Management Plan, substantially in accordance with the **Outline CEMP [APP-277],** is secured through Requirement 13 in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that construction noise and vibration are appropriately controlled. The potential effects of construction traffic on the local highway network are assessed in **ES Volume 1, Chapter 13: Transport and Access [APP-065]**, which considers construction vehicle movements, traffic volumes, road safety and effects on road users. This included the capacity of local roads and infrastructure to accommodate construction vehicles with consideration of construction traffic volumes, vehicle types, route suitability, and network performance. The assessment concludes that the level of construction traffic associated with the Scheme is unlikely to materially affect road safety on links within the Study Area, and no significant adverse effects on accident risk are anticipated. The assessment additionally concludes that with appropriate mitigation such as the Construction Traffic Management Plan in place to manage construction vehicle movements, there would be no significant adverse impacts on the local highway network during the construction, operation maintenance, and decommissioning phases of the Scheme. An **Outline Construction Traffic Management Plan (CTMP) [APP-287]** has been prepared and submitted with the DCO application. The aim of the CTMP is to ensure that the effect of the construction phase on the local highway network is minimised. The **Outline CTMP [APP-287]** sets out measures to coordinate construction deliveries by HGVs to arrive and depart between

Reference	Theme	Comments/Issues Raised	Applicant's Response
			09:30 and 16:30 where possible, to avoid peak network hours of 08:00–09:00 and 17:00–18:00. It also includes a community liaison element to keep local communities informed about the construction process and to provide a contact for feedback should any issues arise. Compliance with the CTMP will be monitored by the Developer, Contractor and Wiltshire Council as local highway authority. The preparation, approval and implementation of the final CTMP, substantially in accordance with the outline CTMP, are secured through Requirement 15 of Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring construction traffic impacts are appropriately managed throughout the construction phase of the Scheme.
CCPC-010	Other Environmental Matters	The disruption while putting in 25 miles of cables to take the energy to the batteries site in Melksham. Is this sensible and safe to those residents there	The Applicant acknowledges concerns about disruption and safety during installation of the cable route to Melksham Substation. The works will be managed through the **Outline CEMP [APP-277]**, **Outline CTMP [APP-287],** and **OPROWPPMP [APP-282]** secured by Requirements 13, 15, and 16 respectively in Schedule 2 to the **Draft DCO [APP-016]**. Cable installation will be undertaken within managed, segregated work areas and, where appropriate, trenchless techniques will be used to avoid major roads and sensitive locations. Once installed, cables are buried to industry standards and present no safety risk to residents as per the assessment presented in **Chapter 20: Other Environmental Matters (Section 20.7 Major Accidents and Disasters)** and **Appendix 20-5 High-Level Electromagnetic Field Assessment [APP-262].** Regarding potential safety concerns relating to construction traffic, the potential effects of construction traffic on highway safety and accident risk are assessed in **ES Volume 1,**

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Chapter 13: Transport and Access [APP-065], which considers changes in traffic flows, HGV movements and accident risk on the local road network. Links experiencing traffic increases above defined assessment thresholds were taken forward for detailed analysis. Supporting technical evidence is provided in **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]**, which includes an assessment of baseline accident data and predicted changes in collision risk arising from construction traffic. The assessment concludes that the level of construction traffic associated with the Scheme is unlikely to materially affect road safety on links within the Study Area, and no significant adverse effects on accident risk are anticipated. Resultantly, the assessment of human health effects in **ES Chapter 18: Human Health [APP-070]** finds no significant adverse effects to health or people's safety as a result of construction works on the Cable Route Corridor. Mitigation measures to manage construction traffic safely are set out in the **Outline Construction Traffic Management Plan [APP-287]**, which includes defined vehicle routing, delivery scheduling and coordination with the local highway authority. The preparation, approval and implementation of the final CTMP, substantially in accordance with the outline CTMP, are secured through Requirement 15 of Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring construction traffic is managed safely throughout the construction phase of the Scheme.
CCPC-011	ecommissioning andConstruction and Decommissioning	This proposal would have a devastating effect on the environment and considerable local disruption during the installation process.	The Applicant is confident that the management and mitigation measures proposed are comprehensive and robust and that the Scheme aligns with national and local planning policy; this is outlined in the **Planning Statement [APP-267]**.

Reference	Theme	Comments/Issues Raised	Applicant's Response
		Wiltshire already has a disproportionate amount of solar farm acreage.	The Applicant acknowledges that there will be impacts on the community as a result of the Scheme, which may be a source of concern for local residents. The Secretary of State will balance those potential impacts and changes against the urgent need and critical national priority for the Scheme as set out in Government policy. The likely significant effects of the Scheme during the construction phase are assessed throughout the **ES [APP-052 to APP-265]**, including effects on traffic and transport, noise and vibration, air quality, landscape and visual amenity, ecology, and local communities. Where likely significant effects are identified, appropriate mitigation measures are incorporated into the Scheme. Measures to limit disruption during construction are set out in the **Outline Construction Environmental Management Plan (CEMP) [APP-277]**. **Requirement 13 in Schedule 2 to the Draft DCO [APP-016]** secures that part of the authorised development can commence until, a CEMP is submitted to and approved by the relevant planning authority. The CEMP must be substantially in accordance with the Outline CEMP, and all construction works associated must be carried out in accordance with the approved CEMP. Of particular relevance to the assessment of effects on local communities are **ES Volume 1, Chapter 8: Landscape and Visual [APP-060], Chapter 13: Transport and Access [APP-065], Chapter 14: Noise and Vibration [APP-066], Chapter 15: Air Quality [APP-067], Chapter 16: Socioeconomics, Tourism and Recreation [APP-068], and Chapter 18: Human Health [APP-070]**, all of which consider potential impacts on residential properties and local communities. As to the concern that Wiltshire already has a disproportionate amount of solar farm acreage, the Applicant notes this comment and recognises the commitment of Wiltshire residents to

Reference	Theme	Comments/Issues Raised	Applicant's Response
			addressing climate change and supporting renewable electricity generation. The Scheme would build on this existing progress by making a further contribution to renewable energy generation and carbon emissions reduction at both a local and national level. The **Statement of Need [APP-266]** describes that there is an urgent and unprecedented need for new low carbon generation in the UK to meet our climate change, energy security and affordability targets. Further, the Government considers that a secure, reliable, affordable, net zero consistent system in 2050 is likely to be composed predominantly of wind and solar (NPS EN-1, Para 3.3.20). In terms of the Lime Down project, a comprehensive Cumulative and In-Combination Effects Assessment has been undertaken in accordance with Planning Inspectorate Advice Note 17 and the relevant NPS EN-1, NPS EN-3 and NPS EN-5 requirements which are set out within **ES Volume 1, Chapter 21: Cumulative and In-Combination Effects [APP-074]** and associated Appendices **[APP-264].** Interaction with proposed or consented but not yet built developments has been fully explored within each of the technical assessments **[APP-059 - APP-072]** with a summary of each of these assessments provided within **ES Volume 1, Chapter 21 Cumulative and In-Combination Effects [APP-073].** Existing schemes are captured within the baseline environment. The four-stage cumulative assessment methodology is described within **ES Chapter 6 EIA Methodology [APP-058].** 358 developments were included in the Long List **[APP-264].** 41 developments are included in the short list (and are therefore assessed) including a number of proposed solar and BESS developments. The list of developments included in the cumulative assessment was reviewed and developed in consultation with Wiltshire Council.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Table 21-8 within ES Volume 1, Chapter 21 Cumulative and In-Combination Effects [APP-073] identifies that, taking a conservative worse case approach, significant cumulative effects with the short list of developments are identified at a limited and discrete number of receptors comprising tourism and recreation impacts during the construction phase on Corsham Park, PRoW WT|CORM|122, long path and Sustrans Cycle Route 403, and on skylark at a District level. Skylark-specific mitigation and habitat enhancement measures are incorporated into the Scheme design to reduce effects on skylark as far as practicable and are described in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061].** These include the provision of suitably large, open set-aside and grassland habitats designed to provide suitable skylark breeding and foraging conditions. These measures are illustrated in **ES Volume 2, Figure 3-4: Landscape and Ecological Mitigation Plan [APP-084]** and detailed in the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]**. Such measures have been designed to reduce the anticipated residual effects resulting from the Scheme to a Local level of geographic importance.

5.9 Kington St Michael Parish Council

Table 5-9 RR-2701

Reference	Theme	Comments/Issues Raised	Applicant's Response
KSMPC-011	Description and DCO Process	The Parish Council will be submitting a comprehensive letter of objections to this proposal. These will include the overall size and scale of the project. The significant negative impact on the rural scene and landscapes, the surrounding village settings, ecology and biodiversity, hydrology, flood risk and drainage, soils and agriculture, noise and vibration, cultural heritage, transport, highways and socio-economics, tourism and recreation all to be balanced against the potential gains of renewable energy generation and carbon reduction. In addition the concentration of solar farms, battery storage and associated infrastructure within the County of Wiltshire that represents a significant cumulative impact and industrialisation of the countryside destroying food production and the farming industry	The Applicant notes the Council's intention to submit a detailed letter of objections covering a range of topics including landscape and visual effects, setting, ecology and biodiversity, hydrology and flood risk and drainage, soils and agriculture, noise and vibration, cultural heritage, transport, socio-economics, tourism and recreation, as well as concerns relating to cumulative development and the scale of the Scheme. The Applicant confirms that these matters have been assessed as part of the Environmental Impact Assessment (EIA) and are reported within the Environmental Statement (ES), including **ES Volume 1, Chapter 8: Landscape and Visual [APP-060], ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061], ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [APP-063], ES Volume 1, Chapter 14: Noise and Vibration [APP-066], ES Volume 1, Chapter 12: Cultural Heritage [APP-064], ES Volume 1, Chapter 13: Transport and Access [APP-065], ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** and **ES Volume 1, Chapter 21: Cumulative and In-Combination Effects [APP-073].** The Applicant's **Statement of Need [APP-266]** provides evidence that an unprecedented capacity of new low-carbon generation schemes is urgently needed for the UK to meet its legally binding climate change targets. The government has confirmed that solar energy is at the heart of the Clean Power 2030 Mission [NPS EN-3 (2025) Paras 2.10.1 & 2.10.2]. The Statement of Need confirms that the need for the Scheme is urgent and that substantial weight should be given to the need for the Scheme [NPS EN-1 (2023) Para 3.2.9-3.2.10]. The Applicant is confident that the proposed management and mitigation measures set out in the **Environmental Statement [APP-052 to APP-265]** are comprehensive and robust and that the Scheme aligns with national and local planning policy; this is outlined in the **Planning Statement [APP-267]**. Of particular relevance are Annex A: National Policy

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Statement Accordance Tables and Annex B: Local Policy Accordance Tables, of the Planning Statement which set out an appraisal of the Scheme against national and local planning policies. The Applicant recognises that the Council intends to provide further detailed submissions on these matters. The Applicant will continue to engage constructively with stakeholders throughout the Examination and will respond to issues raised through the formal Examination process.

5.10 Stanton St Quintin Parish Council

Table 5-10 RR-0625

Reference	Theme	Comments/Issues Raised	Applicant's Response
SSQPC-001	Landscape and Visual	The Stanton St Quintin Parish Council has extremely strong objections to this proposal. The objections relate to the vast scale of the development in open countryside.	The Scheme has been designed to deliver the greatest possible benefit from the available land and the available grid connection, whilst avoiding, minimising and/or mitigating harmful environmental effects. As per the description set out in **ES Volume 1, Chapter 3: The Scheme [APP-055]** the total area within the DCO Order Limits encompasses approximately 1,237 hectares (ha). Of this, the 'Solar PV Sites' comprise approximately 749.1 ha of land. Around 479.5 ha of this land is proposed as being required for installation of solar PV, battery storage, and associated infrastructure. The remaining 269.5 ha would provide areas dedicated to ecological mitigation, measurable Biodiversity Net Gain (BNG) delivery, landscaping, offsets and agricultural land managed for environmental enhancement and habitat creation. The Cable Route Corridor, which stretches approximately 22 km from 'Lime Down D' to Melksham Substation and links together the Solar PV Sites, covers approximately 463.2 ha. Approximately 17.8 ha (of which 5.9 ha overlap with the Cable Route Corridor) is proposed for Highway Improvement Areas within which improvements to sections of the existing highway network will be completed to facilitate access to the Scheme, such as improvements to road edge and traffic management. Work will be undertaken by the Applicant and National Grid within the Existing National Grid Melksham Substation, requiring a total area of 12.8 ha. The Applicant remains committed to delivering a Scheme that makes a meaningful contribution to the UK's transition to net zero, while also seeking to minimise adverse impacts and maximise opportunities for environmental enhancement and community benefits.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			An assessment of landscape and visual effects is provided in the Landscape and Visual Impact Assessment (LVIA) presented in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**. The LVIA assesses effects on identified landscape and visual receptors, including residential properties and users of public rights of way, and identifies where significant effects may occur. The LVIA found no significant long term visual effects to Residential Properties as a consequence of the Scheme. The scale of development within the Order Limits has been significantly reduced from the layout assessed in the Preliminary Environmental Information Report (PEIR) through an iterative design process undertaken in response to consultation and in accordance with the mitigation hierarchy to avoid, reduce and mitigate adverse effects. As part of this design evolution, panels along the edge of the Cotswolds National Landscape and along the Fosse Way have been removed. Mitigation measures to address landscape and visual effects are set out in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**, **Figure 3-4-1 to 3-4-5.2 Landscape and Ecology Mitigation Plan [APP-084]** and detailed within the **Outline Landscape and Ecological Mitigation Plan (LEMP) [APP-283]** and the **Outline Ecological Protection and Mitigation Strategy (EPMS) [APP-284]**. These documents include proposals for new and enhanced planting, retention of existing hedgerows and woodland, and landscape integration measures to reduce visual effects over time. In addition, the Scheme design incorporates minimum offsets from existing landscape features, including residential properties, ancient woodland, woodland, hedgerows, public rights of way and watercourses, to further limit visual impacts.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			The preparation, approval and implementation of detailed landscape and ecological management plans, substantially in accordance with the **OLEMP [APP-283]** and **EPMS [APP-284]**, are secured through requirements in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that the identified mitigation measures are delivered and maintained throughout the lifetime of the Scheme.
SSQPC-002	Transport and Access	There would be an issue with increased traffic on the local narrow roads; impact on the local hospitality and tourism and impact on walkers and riders in the area.	Traffic The capacity of local roads and infrastructure to accommodate construction vehicles is assessed in **ES Volume 1, Chapter 13: Transport and Access [APP-065],** which considers construction traffic volumes, vehicle types, route suitability and network performance. The assessment concludes that, with appropriate mitigation in place, there would be no significant adverse impacts on the local highway network. Supporting technical information is provided in **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]**, which identifies specific locations where traffic management measures or passing arrangements may be required on narrower sections of construction routes. The assessment presented in Annex H of **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]** demonstrates adequate carriageway width or frequency of passing place opportunity to pass at least an HGV and a light vehicle as requested in comments provided by WC. To provide further comfort, additional information will be added to **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]** and resubmitted at Deadline 1 of Examination to demonstrate that there is adequate carriageway width and/or

Reference	Theme	Comments/Issues Raised	Applicant's Response
			passing place opportunity for two HGVs when accessing Lime Down Site D. Mitigation measures to manage construction traffic are set out in the **Outline Construction Traffic Management Plan (CTMP) [APP-287].** The CTMP is designed to minimise the effects of construction traffic on local roads and includes measures for vehicle routing, delivery scheduling and liaison with the local highway authority. The preparation, approval and implementation of the final CTMP, substantially in accordance with the outline CTMP, are secured through Requirement 15 of Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring construction traffic impacts on local roads and infrastructure are appropriately managed throughout the construction phase of the Scheme. <u>Local businesses and tourism</u> The potential effects of the Scheme on tourism and recreation are assessed **in ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068],** supported **by ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]**. The assessment considers baseline tourism activity, visitor attractions, recreational assets and tourism-dependent businesses within the study area. The assessment evaluates potential effects on the use, enjoyment and desirability of nearby tourism destinations, including impacts on individual visitor attractions, recreational routes, events and businesses reliant on tourism. It also considers whether changes to landscape character or visual amenity could influence visitor behaviour.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			The assessment identifies a worst-case scenario in which a temporary loss of up to 50 tourism-related jobs could occur locally during construction, and a long-term loss of up to 11 tourism-related jobs could occur during the operational phase of the Scheme. This represents a precautionary estimate based on conservative assumptions. The assessment concludes that, while some localised effects on tourism receptors are anticipated to occur, significant adverse effects on the wider tourism economy are not anticipated. These findings are fully reported in the ES and will be weighed in the planning balance alongside the Scheme's wider economic and environmental benefits. The Applicant notes that the approach to assessment of tourism impacts is being discussed with Wiltshire Council's Economic and Regeneration Team and is set out in the Statement of Common Ground with Wiltshire Council to be submitted at Deadline 1. An assessment of the likely effects of the Scheme on the local economy and employment is provided in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]**. This chapter considers potential impacts on construction and engineering sectors, agricultural activity, tourism-related businesses, and wider local economic conditions during construction, operation and decommissioning. Supporting evidence is provided in **ES Volume 3, Appendix 16-3: Socio-Economics, Tourism and Recreation – Summary of Non-Significant Effects [APP-242]**, which summarises that effects on the local economy and economic prosperity are assessed as negligible to minor beneficial, with construction expenditure and employment generation contributing positive, temporary effects on local economic activity.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			The assessment therefore concludes that the Scheme would not result in significant adverse effects on local businesses or the wider local economy, and that socio-economic benefits, including job creation and local supply-chain opportunities, are expected during the construction phase, with more modest economic and skills and supply chain opportunities during the operational phase. The Applicant notes that the approach to assessment of socio-economic effects has been agreed with Wiltshire Council's Economics and Regeneration Team, with the exception of matters relating to agricultural employment, which is still being discussed. This is set out in the Statement of Common Ground with Wiltshire Council to be submitted at Deadline1. <u>Walkers and riders</u> A detailed assessment of the likely significance of effects from the Scheme on the use and desirability of individual PRoW, and recreational access to the countryside, has been included in the **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** and **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241].** This assessment considers the impact on individual recreational routes – be that practically in their use, and their enjoyment and desirability. The Applicant confirms that the majority of significant adverse effects can be mitigated, however understands that some significant adverse effects to users of PROWs and unsurfaced roads in Lime Down E cannot be mitigated further during construction. No significant residual effects are anticipated during the operational phase of the Scheme. The Applicant notes that the assessment of PROW impacts and

Reference	Theme	Comments/Issues Raised	Applicant's Response
			mitigation is being discussed with Wiltshire Council's Countryside Access Team and is set out in the Statement of Common Ground with Wiltshire Council to be submitted at Deadline1. The Applicant confirms that existing PRoW are to be controlled within the Scheme design with PRoW management strategies set out in **the Outline Public Rights of Way and Permissive Paths Management Plan (PROWPPMP) [APP-282].** These are confirmed as embedded mitigation measures in Section 16.9 of **ES Volume 1, Chapter 16: Socio Economics, Tourism and Recreation [APP-068]**. New permissive access routes have been included in the Scheme design, shown as Work No.10 on the **Works Plan [APP-007**] and shown on **ES Volume 2, Figure 3-4: Landscape and Ecology Mitigation Plan [APP-283].** These are considered as additional mitigation and enhancement measures in Section 16.11 of **ES Volume 1, Chapter 16: Socio Economics, Tourism and Recreation [APP-068]**. The PRoW and Permissive Paths MP is secured through Requirement 16 of Schedule 2 of the **Draft DCO [APP-016**]. The preparation, approval and implementation of the detailed CEMP and CTMP, substantially in accordance with the outline plans, are secured through Requirements 13 and 15 respectively in Schedule 2 of the **Draft Development Consent Order [APP-016],** ensuring that impacts on PRoW and recreational routes are appropriately managed during construction. Equestrian facilities, including private stables and paddocks, studs, riding schools, and on public rights of way such as bridleways and byways have been considered as specific recreational receptors in the assessment in the **ES Volume 1,**

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]. The likely effects on these locations and receptors are specifically and individually assessed in **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]**. The Applicant confirms that the majority of significant adverse effects can be mitigated, however understands that some significant adverse effects to users of routes in Lime Down E cannot be mitigated further during construction. No significant residual effects are anticipated during the operational phase of the Scheme. The Applicant has committed to ensuring the operation or recreational use of equestrian facilities and PROWs is protected as much as possible through the implementation of embedded and additional mitigation measures set out in the **OCTMP [APP-287**] and **OPROWPPMP [APP-282],** secured respectively by Requirements 15 and 16 in Schedule 2 to the **Draft DCO [APP-016**]. The Applicant notes that the approach to equestrian and PROW impacts is being discussed with Wiltshire Council's Countryside Access Team and is set out in the Statement of Common Ground with Wiltshire Council to be submitted at Deadline 1.
SSQPC-003	Socio-Economics, Tourism and Recreation	The development could also have a detrimental impact on the property prices	Impacts of the Scheme on property prices have not been assessed as these have been agreed by the Planning Inspectorate to be scoped out of assessment in the ES, as set out in **ES Volume 3, Appendix 1-2: Scoping Opinion Response Table [APP-181].**
SSQPC-004	Hydrology, Flood Risk and Drainage	and the rain storm run-off from the panels would cause severe flooding.	An assessment of the effects of the Scheme on flood risk both within the Order Limits and the surrounding area is provided **in ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [APP-063]**, with supporting information provided **in ES Volume 3, Appendix 11-1 to 11-9: Flood Risk Assessment and Drainage Strategy [APP-210 to APP-218].**

Reference	Theme	Comments/Issues Raised	Applicant's Response
			The assessment concludes that, with the embedded mitigation measures secured through the parameters assessed in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [APP-063]**, the detailed drainage design to be approved under the **Draft Development Consent Order [APP-016]**, and the implementation of construction controls through the **Outline Construction Environmental Management Plan [APP-277]**, the Scheme would not result in a material increase in off-site flood risk, including to adjacent communities and downstream receptors. Any on-site flood risk would be managed such that the Scheme remains safe and operable for its lifetime. The assessment has been prepared in accordance with national policy and best practice guidance and in consultation with the Environment Agency and Lead Local Flood Authority and is set out in the relevant Statement of Common Ground to be submitted at Deadline 1. The **Outline Construction Environmental Management Plan (CEMP) [APP-277]** has been developed to control construction-phase risks and ensure there is no material increase in off-site flood risk. In accordance with NPS EN-3 (paragraph 2.10.84), the assessment differentiates between solar PV panel areas, which drain to the existing ground and therefore do not generally give rise to significant drainage effects, and associated infrastructure (for example access tracks, temporary construction compounds, substations and the BESS) where runoff controls are required. Where drainage measures are necessary, these include permeable surfacing, infiltration features, swales and attenuation storage to manage surface water and maintain greenfield runoff behaviour, as applicable. **Requirement 13 in Schedule 2 to the Draft DCO [APP-016]**

Reference	Theme	Comments/Issues Raised	Applicant's Response
			secures that part of the authorised development can commence until, a CEMP is submitted to and approved by the relevant planning authority. The CEMP must be substantially in accordance with the Outline CEMP, and all construction works associated must be carried out in accordance with the approved CEMP.
SSQPC-005	Socio-Economics, Tourism and Recreation	The huge number of workers on the site would impact on all the local residents which could impact on the already overstretched doctors and other local services.	Impacts on local services as a result of construction workers for the Scheme have been assessed **in ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** and **in ES Volume 1, Chapter 18: Human Health [APP-070]**. The assessment of socio-demographic changes as a result of inbound construction workers has determined that there are no significant adverse effects to the socio-demographic environment (age, health, disability, access to housing) as the inbound construction workforce are anticipated to be largely temporary, and accommodated in hotels across a 20 km Study Area. As such, impacts on access to services are likely to be spread across a large area, with the maximum population uplift over this area expected to be approximately 0.054%. With respect to access to service including health services, the assessment in **ES Volume 1, Chapter 18: Human Health [APP-070]** considers the likely health requirements for onsite workers to access general practice healthcare and emergency healthcare. Ignoring that temporary inbound workers are anticipated to be accommodated within 20 km of the Scheme, the additional workforce associated with inbound workers (+412) is equivalent to approximately 0.3% of the patient list of GP practices within 5 km of the Scheme. This is therefore not a substantial increase, and is not likely to have any significant effect on health and wellbeing of existing residents.

Reference	Theme	Comments/Issues Raised	Applicant's Response
SSQPC-006	Ecology and Biodiversity	The environmental impact on the local countryside is unacceptable with potential impact on local wildlife, heritage features and the scale of the infrastructure	Wildlife Potential impacts on ecology and biodiversity are fully assessed in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**. This assessment considers baseline ecological conditions and evaluates likely significant effects arising during the construction, operation and decommissioning phases of the Scheme. It identifies avoidance, mitigation and enhancement measures to address potential impacts on habitats and protected and notable species. It also identifies opportunities for ecological enhancement, including the creation and long-term management of habitats, and delivery of biodiversity net gain. The assessment concludes that, with the identified embedded and additional mitigation measures in place, no unacceptable significant adverse effects on ecology and biodiversity are anticipated. The Applicant notes that the approach to the assessment in relation to ecology and biodiversity in general is being discussed with Wiltshire Council and Natural England and is set out in the relevant Statements of Common Ground to be submitted at Deadline 1. During construction, specific measures are proposed to avoid disturbance and displacement of wildlife. These include protective buffers around sensitive habitats and features, timing restrictions on vegetation clearance, pre-construction ecological surveys, species-specific mitigation, and pollution prevention controls which are set out in the **Outline Ecological Protection and Mitigation Strategy (EPMS) [APP-284]**. Measures to protect trees and hedgerows are also set out in **ES Volume 1, Chapter 10: Arboriculture [APP-062].** The Scheme will also result in the cessation of intensive arable farming within the Solar PV Sites. As identified in **ES Volume 1,**

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Chapter 9: Ecology and Biodiversity [APP-061], this is expected to reduce the ongoing application of herbicides and pesticides, supporting improvements in habitat quality over the operational lifetime of the Scheme. The reversion of existing arable land within the Solar PV Sites to predominantly grassland habitats can be expected to benefit a wide range protected and notable species, as identified in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061].** Mitigation and enhancement measures are detailed in the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]** and the **Outline Ecological Protection and Mitigation Strategy (OEPMS) [APP-284]**, which set out habitat creation, species protection measures, buffer zones and long-term ecological management. The preparation, approval and implementation of the detailed Landscape and Ecological Management Plan, substantially in accordance with the **OLEMP [APP-283],** are secured through Requirement 7 in Schedule 2 of the **Draft Development Consent Order [APP-016].** The preparation, approval and implementation of the detailed Ecological Protection and Mitigation Strategy, substantially in accordance with the **OEPMS [APP-284]**, are secured through Requirement 8 in Schedule 2 of the **Draft Development Consent Order [APP-016]**. These requirements ensure that ecological protection and enhancement measures are delivered and maintained throughout construction and operation of the Scheme. <u>Heritage features</u> The potential effects of the Scheme on cultural heritage, are fully assessed in **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, supported by detailed technical appendices in **ES Volume**

Reference	Theme	Comments/Issues Raised	Applicant's Response
			3, Appendices 12-1 to 12-7 [APP-219 to APP-231]. The chapter considers baseline conditions, identifies built and archaeological heritage assets within the study area, and assesses likely effects during construction, operation and decommissioning, including effects on setting. The assessment is underpinned by extensive desk-based research, geophysical survey and evaluation trenching, as detailed in **ES Volume 3, Appendix 12-2: Archaeological Desk-Based Assessments [APP-220], Appendix 12-4: Archaeological Geophysical Survey Reports [APP-224], and Appendix 12-5: Interim Evaluation Trial Trenching Reports [APP-225].** The Applicant notes that the approach to the assessment has been agreed with Wiltshire Council and the methodology for the mitigation strategy is being discussed with Wiltshire Council and is set out in the relevant Statement of Common Ground to be submitted at Deadline 1. Embedded mitigation measures to avoid or reduce harm to heritage assets are set out in Section 12.9 of **ES Volume 1, Chapter 12: Cultural Heritage [APP-064],** with additional mitigation measures detailed in Section 12.11. An overarching archaeological mitigation strategy is provided in **ES Volume 3, Appendix 12-6: Outline Archaeological Mitigation Strategy [APP-230],** which sets out the framework for further archaeological investigation, recording and protection where ground disturbance cannot be avoided. The preparation, approval and implementation of detailed archaeological Written Schemes of Investigation, substantially in accordance with the Outline Archaeological Mitigation Strategy, are secured through Requirement 12 of Schedule 2 of the **Draft**

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Development Consent Order [APP-016], ensuring that appropriate protection, recording and mitigation are delivered before and during construction. Scale The Project has been designed to deliver the greatest possible benefit from the available land and the available grid connection, whilst avoiding, minimising and/or mitigating harmful environmental effects. As per the description set out in **ES Volume 1, Chapter 3: The Scheme [APP-055]** the total area within the DCO Order Limits encompasses approximately 1,237 hectares (ha). Of this, the 'Solar PV Sites' comprise approximately 749.1 ha of land. Around 479.5 ha of this land is proposed as being required for installation of solar PV, battery storage, and associated infrastructure. The remaining 269.5 ha would provide areas dedicated to ecological mitigation, measurable Biodiversity Net Gain (BNG) delivery, landscaping, offsets and agricultural land managed for environmental enhancement and habitat creation. The Applicant remains committed to delivering a Scheme that makes a meaningful contribution to the UK's transition to net zero, while also seeking to minimise adverse impacts and maximise opportunities for environmental enhancement and community benefits.

5.11 Luckington and Alderton Parish Council

Table 5-11 RR-2873

Reference	Theme	Comments/Issues Raised	Applicant's Response
LAPC-001	Socio-Economics, Tourism and Recreation	The huge number of workers on the site would impact on all the local residents which could impact on the already overstretched doctors and other local services.	Impacts on local services as a result of construction workers for the Scheme have been assessed **in ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** and **in ES Volume 1, Chapter 18: Human Health [APP-070]**. The assessment of socio-demographic changes as a result of inbound construction workers has determined that there are no significant adverse effects to the socio-demographic environment (age, health, disability, access to housing) as the inbound construction workforce are anticipated to be largely temporary, and accommodated in hotels across a 20 km Study Area. As such, impacts on access to services are likely to be spread across a large area, with the maximum population uplift over this area expected to be approximately 0.054%. With respect to access to service including health services, the assessment in **ES Volume 1, Chapter 18: Human Health [APP-070]** considers the likely health requirements for onsite workers to access general practice healthcare and emergency healthcare. Ignoring that temporary inbound workers are anticipated to be accommodated within 20 km of the Scheme, the additional workforce associated with inbound workers (+412) is equivalent to approximately 0.3% of the patient list of GP practices within 5 km of the Scheme. This is therefore not a substantial increase, and is not likely to have any significant effect on health and wellbeing of existing residents.
LAPC-002	Ecology and Biodiversity	The environmental impact on the local countryside is unacceptable with potential impact on local wildlife, heritage features and the scale of the infrastructure	As per the description set out in **ES Volume 1, Chapter 3: The Scheme [APP-055]** the total area within the DCO Order Limits encompasses approximately 1,237 hectares (ha). Of this, the 'Solar PV Sites' comprise approximately 749.1 ha of land. Around 479.5 ha of this land is proposed as being required for installation of solar PV, battery storage, and associated infrastructure. The remaining 269.5 ha would provide areas dedicated to ecological mitigation, measurable Biodiversity Net Gain (BNG) delivery, landscaping, offsets and agricultural land

Reference	Theme	Comments/Issues Raised	Applicant's Response
			managed for environmental enhancement and habitat creation. The Applicant remains committed to delivering a Scheme that makes a meaningful contribution to the UK's transition to net zero, while also seeking to minimise adverse impacts and maximise opportunities for environmental enhancement and community benefits.
LAPC-003	Hydrology, Flood Risk and Drainage	For the reasons summarised below, Luckington and Alderton Parish Council is firmly opposed to the proposed Lime Down Solar Park (LDSP) development. This response was approved at the Luckington and Alderton Parish Council Meeting on Wednesday 10th December 2025. Climate Change: We believe that the area covered by the proposed Lime Down Solar Park development, in common with many other parts of the UK, has seen an increase in significant weather events, particularly storms and associated high risk flooding events during recent years. This has resulted in many severe flooding events 'downstream' of the proposed development site, and we are concerned that this increasing risk has not been adequately considered nor has it triggered appropriate mitigation proposals from the developer. This omission has potentially severe consequences for the wider community within the Bristol Avon catchment area and should be properly addressed.	The Applicant acknowledges concerns regarding recent storm events and flooding within the wider Bristol Avon catchment. Climate change is incorporated throughout **ES Volume 1, Chapter 11 Hydrology, Flood Risk and Drainage [APP-063]** using the latest Environment Agency allowances for the relevant management catchments, including peak river flow uplifts and peak rainfall intensity allowances, applied within the assessment and, where proportionate, within site-specific hydraulic modelling. The assessment concludes that, with these allowances applied, the Scheme would not result in a material increase in off-site flood risk, including to adjacent communities and downstream receptors, and that any on-site flood risk would be managed such that the Scheme remains safe and operable for its lifetime. The assessment has been prepared in accordance with national policy and best practice guidance and in consultation with the Environment Agency and Lead Local Flood Authority and is set out in the relevant Statement of Common Ground to be submitted at Deadline 1. The **Outline Construction Environmental Management Plan (CEMP) [APP-277]** has been developed to control construction-phase risks and ensure there is no material increase in off-site flood risk. The Outline CEMP will be secured via Requirement 13 of the **Draft DCO [APP-016]**.

Reference	Theme	Comments/Issues Raised	Applicant's Response
LAPC-004	Hydrology, Flood Risk and Drainage	Flooding and Drainage: The area of the proposed Lime Down Solar Park is vast. It sits astride and encompasses a large part of the headwaters of the Bristol Avon river. The surface water which falls on the proposed development area either flows overground to the rivers, or through the subsoil or down to the aquifers to reach the Luckington Avon, Sherston Avon or Gauzebrook tributaries and onwards to the Bristol Avon. All of these tributaries and rivers suffer severe flooding, which significantly impacts the downstream conurbations of Malmesbury, Chippenham, Melksham, Trowbridge, Bradford n Avon, Bathford, Bath and Bristol.	The Applicant acknowledges that runoff from the Site contributes to the Luckington Avon, Sherston Avon and Gauze Brook tributaries and subsequently to the Bristol Avon catchment. An assessment of the effects of the Scheme on flood risk both within the Site and the surrounding area is provided in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [APP-063],** with supporting information provided in **ES Volume 3, Appendix 11-1 to 11-9: Flood Risk Assessment and Drainage Strategy [APP-210 to APP-218].** The assessment concludes that, with the embedded mitigation measures secured, the Scheme would not result in a material increase in off-site flood risk, including to adjacent communities and downstream receptors, and that any on-site flood risk would be managed such that the Scheme remains safe and operable for its lifetime. The assessment has been prepared in accordance with national policy and best practice guidance and in consultation with the Environment Agency and Lead Local Flood Authority and is set out in the relevant Statement of Common Ground to be submitted at Deadline 1. The **Outline Construction Environmental Management Plan (CEMP) [APP-277]** has been developed to control construction-phase risks and ensure there is no material increase in off-site flood risk. The Outline CEMP will be secured via Requirement 13 of **the Draft DCO [APP-016].**
LAPC-005	Hydrology, Flood Risk and Drainage	The proposal includes enormous impermeable motorised solar panels erected above ground level, and with large impermeable battery and transformer installations. However these are constructed, they will	The Applicant does not agree that the solar PV arrays are "*enormous impermeable*" surfaces that inevitably speed up runoff or materially alter groundwater recharge. The assessment in **ES Volume 1, Chapter 11 Hydrology, Flood Risk and Drainage [APP-063]** explains that panels are elevated and configured such that rainfall drains to ground beneath and between panels,

Reference	Theme	Comments/Issues Raised	Applicant's Response
		inevitably speed up run off, alter the ways in which water enters the subsoil and aquifers, and erode/redirect surface water flows. The local waterways and fields frequently flood, blocking roads and damaging property. Changing this is highly likely to make matters much worse, yet these implications have been inadequately considered in the application. Irrespective of the limited mitigation measures proposed on-site by the developer, any water falling on, or passing through the development area will inevitably enter the River Avon at some point, yet the developers have dismissed the off-site flooding implications of this development as being unimportant. We feel this position is ill-judged and incorrect. The scale and extent of the proposed Lime Down Solar Park represent a very significant potential flooding threat to all of the land, housing and businesses downstream of the site along the whole catchment of the River Avon. The developers' proposals fail to adequately consider or mitigate for this substantial threat.	maintaining existing drainage pathways. The existing baseline comprises intensively managed arable land subject to trafficking, compaction and periods of bare ground, and the Scheme introduces permanent grass cover and reduced soil disturbance which improves infiltration capacity and soil structure relative to the baseline. National policy recognises that ground-mounted solar PV generally drains to ground and does not create significant drainage impacts where ground cover is maintained (NPS EN-3 paragraph 3.10.75). The assessment concludes that, with the embedded mitigation measures secured, the Scheme would not result in a material increase in off-site flood risk, including to adjacent communities and downstream receptors, and that any on-site flood risk would be managed such that the Scheme remains safe and operable for its lifetime. The assessment has been prepared in accordance with national policy and best practice guidance and in consultation with the Environment Agency and Lead Local Flood Authority and is set out in the relevant Statement of Common Ground to be submitted at Deadline 1. The **Outline Construction Environmental Management Plan (CEMP) [APP-277]** has been developed to control construction-phase risks and ensure there is no material increase in off-site flood risk. The Outline CEMP will be secured via Requirement 13 of **the Draft DCO [APP-016]**.
LAPC-006	Human Health	Drinking Water: The proposed development site sits over the extensive and highly sensitive and vulnerable Oolitic limestone aquifers. These are an important source of safe	The Applicant does not agree that the Scheme presents a significant pollution threat to drinking water supplies or that mitigation is inadequate. Groundwater receptors, including the underlying aquifers, are assessed and controlled within **ES Volume 1, Chapter 11 Hydrology, Flood Risk and Drainage**

Reference	Theme	Comments/Issues Raised	Applicant's Response
		drinking water for an extensive geographic area. The proposals lack essential details, but we are concerned that the proposed location and construction of the solar panel installations, transformers and other installations, alongside the proposed BESS - battery facilities represent a significant threat of pollution, fire risk (with elevated pollution risk from contaminated water). This risk is likely to be particularly high during the construction and commissioning phase of the proposals, yet there is little detail in the proposals, and what is presented is wholly inadequate and offers no realistic mitigation options. We should not be risking such an important source of drinking water in this way.	**[APP-063]** and **ES Volume 1, Chapter 19: Ground Conditions [APP-071]**, which consider construction and operational pollution pathways and set out embedded and additional mitigation to avoid significant adverse effects on controlled waters. Potential pollution risks associated with hardstanding areas for supporting electrical infrastructure, including BESS and substations, are managed through the principle of controlled drainage and pollution prevention measures, with detailed design and operational controls secured through Requirements 5 and 14 of the **Draft Development Consent Order [APP-016]**, including emergency response provisions to prevent uncontrolled release of contaminated liquids. Construction phase risks, including during commissioning, are managed through secured pollution prevention and incident response measures within the **Outline CEMP [APP-277]**. No amendments to the application documents are required.
LAPC-007	Landscape and Visual	Landscape and Visual: The proposed Lime Down Solar Park development sits adjacent to the southern boundary of the Cotswolds Natural Landscape (CNL) (formerly ANOB), and much of the proposed development will be easily visible from within the CNL. The developer is proposing the use of enormous 4.5m motorised solar panels, which are ugly, impossible to effectively conceal within the iconic Cotswolds landscape, and noisy. Some of the other installations are intended to be over 7m high. The local landscape is such, that despite the	The Cotswolds National Landscape (CNL) is fully assessed as a standalone receptor within **ES Volume 3, Appendix 8.6: Assessment of Effects on the Special Qualities of the Cotswolds National Landscape [APP-197]**. This assessment considers the effects of the Scheme on landscape character, visual amenity and the special qualities of the CNL, including tranquillity. The assessment found that there would be some short term impact to landscape character within the setting of the CNL but due to the avoidance measures embedded within the Scheme, harm to the CNL itself would be minimal with beneficial effects in the long term which would further the purposes of the designation. In respect of visual amenity, some short-term adverse effects would be experienced by a small number of

Reference	Theme	Comments/Issues Raised	Applicant's Response
		developers' best efforts to conceal them from view, they are likely to be visible from over 20 miles away. This gently rolling, picturesque landscape, with its characteristic far reaching views, simply cannot be made to 'hide' such enormous industrial facilities. They will be simply lost forever, and the suggestion that the area could be returned to it's present state after 60 years of industrial use is simply not credible.	visual receptors with views to and from the CNL. However, these would reduce over time as a result of the proposed mitigation. The assessment of effects on the special qualities of the CNL scoped out 3 SQs as there is no association with the Site. The assessment found that there are no direct effects on the remaining SQs. There are some Minor/ Negligible short-term effects on a small number of visual receptors within the setting of the CNL which effect SQ7 -Tranquillity and SQ13 Archaeology and historic associations. However, these effects are mitigated by Year 15 when proposed vegetation has matured. The assessment also found that there would be beneficial effects on SQ 6 – Biodiversity and nature recovery as a result of the delivery of approximately 119.7 hectares of flower-rich neutral grassland (as defined in the BNG assessment) and SQ 12 - An accessible landscape as a result of the delivery of approximately 12.8km of new permissive paths within the setting of the CNL. The remaining SQs would remain entirely intact. The Scheme was refined through an iterative design process to avoid and reduce effects on the CNL and its setting. Panels along the edge of the CNL were removed from the Order Limits in fields C2, C3 and C4 where significant visual effects on receptors within the CNL were identified. Panels were also removed from fields C1, C6, C8, the western section of C9 and the majority of C10, with this land now proposed for ecological mitigation to protect the setting of the CNL. In addition, panels within fields A11 and A12 were removed and the land repurposed for ecological mitigation to protect the setting of the CNL towards Sherston. All land parcels adjacent to the CNL are proposed to deliver habitat enhancement, informed by the CNL Management Plan and the Cotswolds National Landscape Strategy and Guidelines, to further the purposes of the designation.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Details of the proposed landscape and ecological mitigation and enhancement measures are provided in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060], Figure 3-4-1 to 3-4-5.2 Landscape and Ecology Mitigation Plan [APP-084]** and the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283],** and the **Outline Ecological Protection and Mitigation Strategy (EPMS) [APP-284]**. The height of the solar PV panels has been assessed using clearly defined design parameters, including a maximum height of 4.5 metres above ground level at maximum tilt, as set out in **ES Volume 1, Chapter 3: The Scheme [APP-055]**. These parameters represent a realistic worst-case scenario for the purposes of the Environmental Impact Assessment. The landscape and visual effects of the Scheme, including the effects of the maximum panel height, are assessed in the Landscape and Visual Impact Assessment (LVIA) presented in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**. The LVIA assesses effects on identified landscape and visual receptors during construction, operation and decommissioning, using the maximum design parameters to ensure a robust assessment. Mitigation measures to address landscape and visual effects, including measures that reduce the perceived height and prominence of panels in views, are set out in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060], Figure 3-4-1 to 3-4-5.2 Landscape and Ecology Mitigation Plan [APP-084]** and detailed within the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]**. These include new and enhanced planting, retention of existing hedgerows and woodland, and landscape integration measures to reduce visual effects over time.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			The noise impacts from the operation of the Scheme and its components are assessed in Section 14.10 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**, with supporting modelling provided in **ES Volume 3, Appendix 14-4: Noise Modelling [APP-237]**. A penalty has been applied to predicted noise levels from the Solar PV Sites to account for the distinctive nature of the sound. Potential mitigation measures are detailed in Section 14.9 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**, and with such measures in place, significant effects from operational noise are not expected. The **Outline Operational Environmental Management Plan [APP-278]** commits to noise levels from the Scheme at residential dwellings being the same as or below those modelled in the ES. This provides assurance that significant effects from operational noise will be avoided, while allowing flexibility in how this is achieved. The preparation, approval and implementation of the detailed Landscape and Ecological Management Plan, substantially in accordance with the **OLEMP [APP-283]**, are secured through Requirement 7 in Schedule 2 of the **Draft Development Consent Order [APP-016]**. The preparation, approval and implementation of the detailed Ecological Protection and Mitigation Strategy, substantially in accordance with the **EPMS [APP-284]**, are secured through Requirement 8 in Schedule 2 of the **Draft Development Consent Order [APP-016]**. These requirements ensure that the identified mitigation and enhancement measures are delivered and maintained throughout the lifetime of the Scheme. Measures to manage decommissioning and reinstatement are set out in the **Outline Decommissioning Strategy [APP-279]**, which has been submitted as part of the DCO Application. The

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Decommissioning Strategy will include robust methodologies and control points to avoid contamination of the underlying land with physical or chemical contaminants and will be applied in conjunction with the Soil Resources Management Plan (SRMP) in order to promote successful reinstatement. A detailed Decommissioning Strategy will be prepared substantially in accordance with the **Outline Decommissioning Strategy [APP-279]** and must be submitted to and approved by the relevant local planning authority prior to the commencement of decommissioning. This is secured through Requirement 20 in Schedule 2 of the **Draft Development Consent Order [APP-016]**. In addition, the Applicant is seeking a time-limited consent for the Scheme to have an operational period of 60 years, with decommissioning to take place following cessation of operation. This is secured by Requirement 20 in Schedule 2 of the **Draft DCO [APP-016]**.
LAPC-008	Transport and Access	Transport: The resident of the hamlets, villages and towns of North Wiltshire frequently use Chippenham for essential local services including medical facilities, hospitals, dentistry, pharmacy , retail and service provisions. There is little public transport in the area and all road routes from these settlements to Chippenham pass through the proposed Lime Down Solar Park development area. Many of these routes are unsuitable for large goods vehicles or safe two-way travel. Almost all of these routes are intended for use as 'access routes' by the large numbers of site vehicles associated with the development. The routes are	The assessment presented in Annex H of **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]** demonstrates adequate carriageway width or frequency of passing place opportunity to pass at least an HGV and a light vehicle as requested in comments provided by Wiltshire Council in its response (August 2025) to the Transport Assessment Scoping Note and confirmed in RR4934 Paragraph 4 of 'Appendix A - Highways and Transport Document Review - Detailed Comments'. This confirms that no passing bay or widening improvements are needed to accommodate these movements on the construction route outside of the Order Limits. The distances between passing points outside of the Order Limits are all within 150 m with forward visibility extending to the next passing point and beyond. This is within the generally accepted distance of 200 metres. As set out in the **OCTMP [APP-287]**, a booking system will be

Reference	Theme	Comments/Issues Raised	Applicant's Response
		already busy, frequently disrupted by accidents, flooding and other road incidents, and the consequential delays are problematic for the communities involved. The duration of the prolonged (2 year) construction period, together with the size and number of vehicles movements involved in the construction, will cause the local community unacceptable disruption and hardship. It may even lead to members of the community being unable to access essential services in a timely manner. The local road network is inadequate and cannot adequately absorb the proposed construction traffic, even with the limited 'improvements' the developer has proposed. The so called 'improvements' seem to largely consist of removing 'inconvenient' road furniture (much of which is in place for sensible safety reasons) for the duration of the 2-year construction period. This is ill-considered and inappropriate. Oversized vehicles travelling in narrow rural lanes, wholly inadequate counter measures and the removal of important roadside safety furniture (for a very protracted period) will significantly increase the risks for those using these roads.	set up to manage arrivals and departures to the Order Limits. This will be implemented in coordination with banksmen, which will be able to hold back any cross-over, should there be any delays on the roads. This will prevent HGVs generated by the Scheme passing each other in opposite directions on the local roads forming part of the construction routes (including this route) and will be confirmed as part of the final CTMP. Excessive widening of existing rural routes to allow two HGVs to pass would be over engineering, because of the following reasons: • temporary nature of the construction period; • trip generation of is an estimate of the deliveries on a peak day, so does not represent a daily average; • trip generation is based on the worst-case assumptions, including but not limited to, all phases and Solar PV Sites being constructed simultaneously and a 50% uplift; • delivery times during the construction phase are limited to those times set out in the **OCTMP [APP-287]**. There will be no HGV construction trips outside of these hours; and • there would be a much greater impact on hedgerow, trees and character; To provide further comfort, additional information has been added to **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]** which will be submitted at Deadline 1 of Examination. This demonstrates that there is adequate carriageway width and/or passing place opportunity for two HGVs.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Further detail of trip generation has also been added to **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]** which will be submitted at Deadline 1 of Examination.
LAPC-009	Other Environmental Matters	BESS - Battery Storage: The battery storage facilities planned as part of the Lime Down Solar Park proposals causes us much concern. They are intended to be located in close proximity to surface water sources and above the sensitive underground vulnerable aquifers, which are an important source of drinking water for a very large geographic area). The proposals lack essential details, but we are concerned that the proposed location and construction of these battery installations represent a significant threat of pollution, fire and noise. We are concerned that the developers proposed mitigation measures will prove completely inadequate in light of the challenging local conditions.	The assessment of likely impacts to human health from BESS fires and noise in **ES Volume 1, Chapter 18: Human Health [APP-070]** has been directed by the assessment of noise, hydrology, flood risk and drainage, and ground contamination, as set out across the relevant technical chapters of the ES. Furthermore, adverse impacts to people and the environment from the BESS are directly controlled through the mitigation measures set out in the **Outline BSMP [APP-286]**, which is secured by Requirement 6 in Schedule 2 to the **Draft DCO [APP-016].** No significant adverse effects to human health are assessed as anticipated to occur. An assessment of potential contamination risks is provided in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [APP-063] and ES Volume 1, Chapter 19: Ground Conditions [APP-071]**, which consider risks to surface water, groundwater and sensitive receptors during construction, operation and decommissioning of the Scheme. These assessments conclude that, with appropriate mitigation and management measures in place, no significant contamination effects are anticipated. The Applicant notes that the approach to risk of contamination of groundwater and surface water has been agreed with Wiltshire Council and is under discussion with the Environment Agency and is set out in the relevant Statement of Common Ground with Wiltshire to be submitted at Deadline 1 and will be included in a future Statement of Common Ground with the Environment Agency. Mitigation and management measures to protect water and ground conditions are set out in the **Outline CEMP [APP-277]** and supporting management plans. These include pollution

Reference	Theme	Comments/Issues Raised	Applicant's Response
			prevention controls, containment measures, emergency response procedures, and site-specific drainage design. In particular, drainage within substation and Battery Energy Storage System (BESS) areas will incorporate lined drainage and automatically actuating shut-off valves to contain any accidental spills or firewater, preventing release to surrounding land or watercourses. An **Outline Battery Safety Management Plan (OBSMP) [APP-286]** has been prepared for the Scheme using guidance from Dorset and Wiltshire Fire and Rescue Service and incorporating recommendations of the National Fire Chiefs Council. The OBSMP ensures that risks associated with battery storage are appropriately mitigated
LAPC-010	Soils and Agriculture	Loss of Agricultural Land: The proposed Lime Down Solar Park encompasses an area of over 2000 acres of productive agricultural land, with much of it believed to be BMV (Best Most Valuable Land). We feel that the loss of such a large tract of land, currently under agriculture, is ill-advised and inappropriate. At a time when food security is so important, valuable agricultural land should not be used for this industrialised purpose. The Lime Down Solar Park proposal is for the site to be in use for 60 years. In reality, this agricultural land will be lost forever, and the suggestion that the area could be returned to its present productive agricultural use after 60 years of industrialisation is simply not credible.	The effects of the Scheme on agricultural land, including land quality and productivity, are assessed in **ES Volume 1, Chapter 17: Soils and Agriculture [APP-069]**, supported by **ES Volume 3, Appendix 17-1: Agricultural Land Classification and Soil Resource Survey Report [APP-243]**. That assessment identifies that the majority of agricultural land affected is not Best and Most Versatile (BMV) land, comprising predominantly Subgrade 3b and Grade 4 land, which is not considered high-quality agricultural land in planning terms. Government-led agricultural initiatives, such as the Sustainable Farming Incentive which is relaunching later in 2026, have prioritised soil health, environmental enhancement and climate resilience, recognising that long-term food security is influenced by a range of factors beyond land take alone, including soil condition, climate change and environmental pressures. The Scheme allows soils to remain in situ and undisturbed during operation, supporting soil recovery and long-term land health, with land reinstated and returned to agricultural use as far as practicable following decommissioning. No permanent loss of agricultural land is anticipated.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			The Applicant does not consider that food security will be compromised by the Scheme (or solar energy more widely). The latest figures to September 2024 indicate that solar occupied around 21,200 ha of agricultural land in the UK. In 2025, 545,000 ha of arable land in England were left uncropped (source: Department for Environment, Food & Rural Affairs, Agricultural land use in England at 1 June 2025). It should also be noted that food security is not identified as an issue within the suite of Energy National Policy Statements or the National Planning Policy Framework (NPPF). Further, the Government's UK Solar Roadmap (2025) states that solar development is not considered to compromise food security, but that the climate and nature crisis poses the greatest long-term risk to food security- a risk which the Scheme directly helps to address by providing a secure, low-carbon source of electricity. As set out in Section 2 of the **Outline Decommissioning Strategy [APP-279],** post-decommissioning of the Scheme, the landowners would choose how the land is to be used and managed. The landowner may return all of the land to arable use, although it is likely that established habitats such as hedgerows and woodland would be retained given their potential benefits to agricultural land and the wider farming estate.
LAPC-011	Ecology and Biodiversity	Impact on wildlife, fauna, flora and local environment: Previous solar industrial projects have been built on a scale which has allowed local mitigation measures to successfully address many of our concerns regarding the impact on wildlife, fauna, flora and local environment. The proposed Lime Down Solar Park is of a much larger order of	Potential impacts of the Scheme on ecology and biodiversity are assessed in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**, which considers baseline conditions and evaluates likely effects during construction, operation and decommissioning. The assessment identifies embedded and additional mitigation measures and concludes that, with these measures in place, no unacceptable significant adverse effects on ecology and biodiversity are anticipated.

Reference	Theme	Comments/Issues Raised	Applicant's Response
		scale. We are concerned that the previously used mitigation measures are not scalable to be effective in protecting the significant diversity and density of wildlife, fauna and flora within the proposed development site, nor can they adequately protect the local environment from contamination and destruction when the development is of such a large industrial magnitude.	Mitigation measures are detailed in the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]** and the **Outline Ecological Protection and Mitigation Strategy (OEPMS) [APP-284]**, which set out habitat and species protection measures, buffer zones, monitoring and long-term ecological management. The prescribed measures are based on best-practice guidance and experience from numerous other schemes of a similar nature. The preparation, approval and implementation of the detailed Landscape and Ecological Management Plan, substantially in accordance with the **OLEMP [APP-283],** are secured through Requirement 7 in Schedule 2 of the **Draft Development Consent Order [APP-016]**. The preparation, approval and implementation of the detailed Ecological Protection and Mitigation Strategy, substantially in accordance with the **OEPMS [APP-284],** are secured through Requirement 8 in Schedule 2 of the **Draft Development Consent Order [APP-016].** These requirements ensure that ecological protection and enhancement measures are delivered and maintained throughout construction and operation of the Scheme.
LAPC-012	Consultation and Engagement	Adequacy of Consultation: Throughout the pre-application consultations, the developer of the Lime Down Solar Park proposals has appeared dismissive of local concerns, failed to provide additional information requested by the local community, and sought to make it difficult for many within the local community to engage with the developer and make their voices heard. This was particularly the case with the 'Targeted Consultation', where many of those directly affected by the traffic proposals were not adequately	The Applicant considers that the statutory consultation has been robust, thorough and undertaken in accordance with the requirements of the Planning Act 2008, the Environmental Impact Assessment (EIA) regulations, and the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009. The **Consultation Report [APP-022**] sets out the Applicant's approach to pre-application consultation. The Applicant considers that the general public was provided with a proportionate and reasonable opportunity to provide feedback on the changes that formed part of the Targeted Consultation, which was undertaken in accordance with the

Reference	Theme	Comments/Issues Raised	Applicant's Response
		informed of the developers' intentions and subsequently felt they had been excluded from the consultation process.	relevant principles as set out in the Statement of Community Compliance. A draft of the SoCC was shared with Wiltshire Council for feedback, and Wiltshire Council confirmed in its Adequacy of Consultation Representation that the approach set out in the SoCC was sufficient. As set out in the **Consultation Report [APP-022]**, a draft of the Applicant's proposed approach to Targeted Consultation was shared with Wiltshire Council and South Gloucestershire Council, and feedback was provided and incorporated before the Targeted Consultation period commenced. The Applicant also notes that the examination process provides a further opportunity for interested parties to comment on the Scheme. This examination is managed by an independently appointed Examining Authority. Further to this, the Applicant provided an extended relevant representation period beyond the minimum statutory timeframe to allow sufficient time for members of the public to review the submitted application documents and register as an interested party.
LAPC-013	Cumulative Effects	Cumulative Effect: Over recent years, the North and Central areas of Wiltshire have seen too many solar panel generating installations approved and built, and the area has been overly developed in this regard. The Lime Down Solar Park proposal is on a much larger scale and is a step too far. It will damage the iconic Cotswolds landscape and rural environment to an unacceptable degree.	A comprehensive Cumulative and In-Combination Effects Assessment has been undertaken in accordance with Planning Inspectorate Advice Note 17 and the relevant NPS EN-1, NPS EN-3 and NPS EN-5 requirements which are set out within **ES Volume 1, Chapter 21: Cumulative and In combination Effects [APP-073] and associated Appendices [APP-264]**. Interaction with proposed or consented but not yet built developments has been fully explored within each of the technical **assessments [APP-059 - APP-072]** with a summary of each of these assessments provided within **ES Volume 1, Chapter 21 In-Combination and Cumulative Effects [APP-073].** Existing schemes are captured within the baseline environment. The four stage cumulative assessment methodology is described **within ES Volume 1, Chapter 6: EIA Methodology [APP-058]**. 358 developments were included in

Reference	Theme	Comments/Issues Raised	Applicant's Response
			the **ES Volume 3, Appendix 21-1: Long List [APP-264].** 41 developments are included in the short list (and are therefore assessed) including a number of proposed solar and BESS developments. The list of developments included in the cumulative assessment was reviewed and developed in consultation with Wiltshire Council. Taking a conservative worse case approach, significant residual cumulative effects are identified at a limited and discrete number of receptors comprising tourism and recreation impacts during the construction phase on Corsham Park, PRoW WT|CORM|122, long path and Sustrans Cycle Route 403, and on skylark at a District level. Skylark-specific mitigation and habitat enhancement measures are incorporated into the Scheme design to reduce effects on skylark as far as practicable and are described in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061].** These include the provision of suitably large, open set-aside and grassland habitats designed to provide suitable skylark breeding and foraging conditions. These measures are illustrated in **ES Volume 2, Figure 3-4: Landscape and Ecological Mitigation Plan [APP-084]** and detailed in the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]**. Such measures have been designed to reduce the anticipated residual effects resulting from the Scheme to a Local level of geographic importance.
LAPC-014	Community Benefits	Community Benefits: The proposed Lime Down Solar Park development offers no benefits whatsoever to the local community (unlike many other similar local developments), yet it's scale, size, proposed cable route and use of overly large solar panels and other associated installations will destroy many of the local assets and amenities already used by both the	The Applicant acknowledges that any adverse effects from the Scheme are more likely to be felt locally than the largely wider-scale benefits of the Scheme. The Scheme is anticipated to help meet the UK's net zero requirements for energy production, which is considered a critical national priority and set out in National Policy Statements for Energy NPS EN-1 (section 4.2) and EN-3. This therefore will benefit the national population rather than just the local population.

Reference	Theme	Comments/Issues Raised	Applicant's Response
		local community and the large number of leisure visitors to the area. This represents a significant loss to the community, yet the developers offer nothing in mitigation or other consideration.	Of particular relevance to the assessment of effects on local communities are **ES Volume 1, Chapter 8: Landscape and Visual [APP-060], Chapter 13: Transport and Access [APP-065], Chapter 14: Noise and Vibration [APP-066], Chapter 15: Air Quality [APP-067], Chapter 16: Socioeconomics, Tourism and Recreation [APP-068], and Chapter 18: Human Health [APP-070]**, all of which consider potential impacts on residential properties and local communities. The Scheme is anticipated to benefit the population within approximately 20km of the Scheme, through providing employment and income especially during construction and peak replacement activities, and providing skills and training opportunities. Where the Scheme is anticipated to benefit local people more specifically, this is done through providing onsite permissive paths to increase access to the countryside, providing improved landscape planting through reinforcing existing hedgerows and planting of new trees, providing biodiversity net gains through habitat improvements. That notwithstanding, the Applicant is committed to providing a Community Benefit Fund to allow for community-driven benefits that are not necessarily associated with the Scheme itself. The purpose is to establish a means to recognise local community needs that the Applicant wants to be able to contribute towards in recognition of the local impact of the Scheme. The Community Benefit Fund is separate from the DCO process, and so is not bound to the same timescales or information requirements as submitted information. Furthermore, community benefits are legally immaterial to planning decisions and cannot be considered when deciding whether to grant planning consent.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			The Applicant acknowledges this and so has sought to provide the Community Benefit Fund voluntarily even though it won't add favourable weight in the planning balance. An assessment of the likely effects of the Scheme on the local economy and employment is provided in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]**. This chapter considers potential impacts on construction and engineering sectors, agricultural activity, tourism-related businesses, and wider local economic conditions during construction, operation and decommissioning. Supporting evidence is provided in **ES Volume 3, Appendix 16-3: Socio-Economics, Tourism and Recreation – Summary of Non-Significant Effects [APP-242]**, which summarises that effects on the local economy and economic prosperity are assessed as negligible to minor beneficial, with construction expenditure and employment generation contributing positive, temporary effects on local economic activity. The assessment therefore concludes that the Scheme would not result in significant adverse effects on local businesses or the wider local economy, and that socio-economic benefits, including job creation and local supply-chain opportunities, are expected during the construction phase, with more modest economic and skills and supply chain opportunities during the operational phase. A detailed assessment of the likely significance of effects from the Scheme on the use and desirability of individual PRoW and recreational access to the countryside is included in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** and **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]**. This assessment considers the impact on individual recreational routes, including their practical use, enjoyment and desirability. The Applicant

Reference	Theme	Comments/Issues Raised	Applicant's Response
			confirms that the majority of significant adverse effects can be mitigated. However, some significant adverse effects to users of PRoW and unsurfaced roads in Lime Down E during construction cannot be mitigated further. No significant residual effects are anticipated during the operational phase of the Scheme. The assessment in **ES Volume 1, Chapter 18: Human Health [APP-070]** also considers the physical and mental health impacts of changes to recreation and countryside access under the assessment topic 'open space, leisure and play', and concludes that no significant adverse effects are anticipated at any phase of the Scheme. The Applicant confirms that existing PRoW are to be controlled within the Scheme design, with management measures set out in the **Outline Public Rights of Way and Permissive Paths Management Plan (PROWPPMP) [APP-282]**, confirmed as embedded mitigation in Section 16.9 of ES Chapter 16. New permissive access routes have been incorporated into the Scheme design, shown as Work No. 10 on the **Works Plan [APP-007]** and illustrated on **ES Volume 2, Figure 3-4: Landscape and Ecology Mitigation Plan [APP-084]**. These are identified as additional mitigation and enhancement measures in Section 16.11 of ES Chapter 16. The PRoW and Permissive Paths Management Plan is secured through Requirement 16 of Schedule 2 of the **Draft Development Consent Order [APP-016]**. The preparation, approval and implementation of the detailed Construction Environmental Management Plan and Construction Traffic Management Plan, substantially in accordance with the outline plans, are secured through Requirements 13 and 15 respectively in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that impacts on PRoW and recreational routes are appropriately managed during construction.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			The approach to recreation and access has been discussed with Wiltshire Council's Public Health team and is under discussion with Wiltshire Council's Countryside Access Team and is set out in the relevant Statement of Common Ground to be submitted at Deadline 1.
LAPC-015	Cultural Heritage	Cultural Heritage, Socio-Economic, Tourism and Recreation: The proposed Lime Down Solar Park encompasses over 2000 acres of rolling Cotswolds landscape. It sits astride the historic Fosse Way Roman Road and there are numerous interesting archaeological and historical sites within the proposed development. It is a destination of recreational choice for visitors from far afield for cycling, driving, motorcycling, walking or horse-riding. Many local businesses are dependent on this for their customer base. We believe that it is likely that the excessive scale of the proposed development will severely curtail the attractiveness and viability of these activities in the future. This is likely to be particularly severe during the highly disruptive 2-year construction period, and their recovery after that must be considered very doubtful. We do not feel that the developer has given this sufficient weight, nor adequately addressed these important concerns.	The potential effects of the Scheme on the Roman Roads (i.e. the Fosse Way), as well as other Roman archaeological assets are fully assessed in **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, supported by detailed technical appendices in **ES Volume 3, Appendices 12-1 to 12-7 [APP-219 to APP-231]**. Where an adverse effect has been identified to Roman archaeological assets appropriate mitigation is proposed. See Section 12.9 of **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]** for embedded mitigation and Section 12.11 for additional mitigation. An overarching archaeological mitigation strategy is provided **in ES Volume 3, Appendix 12.6 Archaeological Mitigation Strategy [APP-230].** Mitigation will be secured through requirement 12 of the DCO. The potential effects of the Scheme on tourism and recreation are assessed in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]**, supported by **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]**. The assessment considers baseline tourism activity, visitor attractions, recreational assets and tourism-dependent businesses within the study area. The assessment evaluates potential effects on the use, enjoyment and desirability of nearby tourism destinations, including impacts on individual visitor attractions, recreational routes, events and businesses reliant on tourism. It also considers whether changes to landscape character or visual amenity could influence visitor behaviour.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			The assessment identifies a worst-case scenario in which a temporary loss of up to 50 tourism-related jobs could occur locally during construction, and a long-term loss of up to 11 tourism-related jobs could occur during the operational phase of the Scheme. This represents a precautionary estimate based on conservative assumptions. The assessment concludes that, while some localised effects on tourism receptors are anticipated to occur, significant adverse effects on the wider tourism economy are not anticipated. These findings are fully reported in the ES and will be weighed in the planning balance alongside the Scheme's wider economic and environmental benefits. The Applicant notes that the approach to assessment of tourism impacts is under discussion with Wiltshire Council's Economic and Regeneration Team and is set out in the relevant Statement of Common Ground to be submitted at Deadline 1.

5.12 Sherston Parish Council

Table 5-12 RR-4350

Reference	Theme	Comments/Issues Raised	Applicant's Response
SPC-001	Landscape and Visual	Sherston Parish Council is writing to register its objection to the proposed Lime Down Solar Farm development. Much of the proposed site is within or very close to the Parish and many of our residents enjoy the open spaces and use the roads that will be impacted by this project. The council wishes to state in the strongest possible terms that they do not believe this this development is appropriate, and in fact will be severely detrimental to the landscape and to the wellbeing of surrounding communities. Whilst we support community renewable energy projects that benefit our local community, this project does not. It is the wrong project, in the wrong place, and under the wrong ownership model.	An assessment of landscape and visual effects is provided in the Landscape and Visual Impact Assessment (LVIA) presented in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**. The LVIA assesses effects on identified landscape and visual receptors, including residential properties and users of public rights of way, and identifies where significant effects may occur. The LVIA found no significant long term visual effects to Residential Properties as a consequence of the Scheme. The scale of development within the Order Limits red line boundary has been significantly reduced from the layout assessed in the Preliminary Environmental Information Report (PEIR) through an iterative design process undertaken in response to consultation and in accordance with the mitigation hierarchy to avoid, reduce and mitigate adverse effects. As part of this design evolution, panels along the edge of the Cotswolds National Landscape and along the Fosse Way have been removed. Mitigation measures to address landscape and visual effects are set out in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]** and detailed within the **Landscape and Ecological Mitigation Plan (LEMP) [APP-283]** and the **Outline Ecological Protection and Mitigation Strategy (EPMS) [APP-284]**. These documents include proposals for new and enhanced planting, retention of existing hedgerows and woodland, and landscape integration measures to reduce visual effects over time. In addition, the Scheme design incorporates minimum offsets from existing landscape features, including residential properties, ancient woodland, woodland, hedgerows, public rights of way and watercourses, to further limit visual impacts. The preparation, approval and implementation of detailed

Reference	Theme	Comments/Issues Raised	Applicant's Response
			landscape and ecological management plans, substantially in accordance with the **LEMP [APP-283]** and **EPMS [APP-284]**, are secured through requirements in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that the identified mitigation measures are delivered and maintained throughout the lifetime of the Scheme. In terms of the impact of the Scheme on wellbeing, this is assessed in **ES Volume 1, Chapter 18: Human Health [APP-070]**. This chapter provides a comprehensive assessment of the Scheme's potential effects on human health, including mental health and wellbeing, through consideration of a broad range of health determinants. These include access to open space and recreation, transport and connectivity, community identity and cohesion, employment and income, noise and vibration, air quality, and access to health and social care services. The assessment applies a health "*lens*" to the findings of relevant technical chapters and concludes that, with embedded mitigation and additional measures secured, the Scheme would not give rise to significant adverse effects on population health, including mental health and wellbeing. The assessment focuses on communities within a 2 km Study Area surrounding the Scheme, identified as those most likely to experience potential health-related effects. Baseline analysis demonstrates that rates of poor mental health within the Study Area are generally lower than national averages, and the assessment considers potential pathways by which the Scheme could influence mental wellbeing, including changes to environment, amenity, access and community factors. Residual effects following mitigation are assessed as not significant. Mitigation measures in respect of human health are secured through the **OLEMP [APP-283]**, **OCEMP [APP-277]**, **OCTMP [APP-287]**, and **OPROWPPMP [APP-282]**, secured by

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Requirements 7, 13, 15 and 16 in Schedule 2 to the **Draft DCO [APP-016]**.
SPC-002	Landscape and Visual	Scale and Landscape Impact The proposed development would have a major and lasting impact on the open spaces and visual amenity afforded to our residents. The solar panels will be much bigger and higher than any project we have seen in the UK. Our footpaths will be hemmed in by high wire fences. The open, rolling landscape will be covered by a sea of black panels.	The Scheme is not permanent. The application is for a period of up to 60 years operational life. At which point, the development would be required to be decommissioned. **ES Volume 1, Chapter 3: The Scheme [APP-055].** The effects of decommissioning on soils and agricultural land are assessed in **ES Volume 1, Chapter 17 Soils and Agriculture [APP-069]**. As stated in this chapter, all land will be returned to its original use and condition as far as practicable and returned to the landowner. The effect on agricultural land quality at decommissioning would be influenced by the extent of disturbance caused by the removal of the Solar PV Panels, for example the presence and dimensions of leftover voids or the depth of the remaining underground cables. Currently, the most environmentally acceptable option is to leave the cables in-situ, although the cables could be removed by excavating at regular intervals and pulling the cable through to the extraction point, thus avoiding the need to excavate the entire cable trench. In either case, the effects would be less than those likely to occur during the construction phase. Built aspects of the Scheme such as the BESS Area and substations are also subject to the proposal to return the land to its original use and condition, which is primarily agricultural land of Subgrade 3b quality, with some Subgrade 3a at the BESS Area. Measures to manage decommissioning and reinstatement are set out in the **Outline Decommissioning Strategy [APP-279]**, which has been submitted as part of the DCO Application. The Decommissioning Strategy will include robust methodologies and control points to avoid contamination of the underlying land with physical or chemical contaminants and will be applied in conjunction with the Soil Resources Management Plan (SRMP) in order to promote successful reinstatement.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			A detailed Decommissioning Strategy will be prepared substantially in accordance with the **Outline Decommissioning Strategy [APP-279]** and must be submitted to and approved by the relevant local planning authority prior to the commencement of decommissioning. This is secured through Requirement 20 in Schedule 2 of the **Draft Development Consent Order [APP-016]**. In addition, the Applicant is seeking a time-limited consent for the Scheme to have an operational period of 60 years, with decommissioning to take place following cessation of operation. This is secured by Requirement 20 in Schedule 2 of the **Draft DCO [APP-016]**. **ES Volume 1, Chapter 8: LVIA [APP-060]** robustly assesses both the landscape and visual effects of the Scheme independently to ensure both the impacts and effects on the fabric and character of the landscape are taken into account as well as the views and visibility. The Lime Down Solar Sites are dispersed in nature and have limited intervisibility with each other. In the assessment of effects for the 1km Local Study Area in Table 2.2 of Appendix 8-3-2-2 **[APP191**] it is noted that "*Construction activities would have an impact locally, and the change in land use from arable farmland to a solar scheme would cause a noticeable change to the character of the 1km Local Study Area. There would be short term Moderate Adverse effects during the construction phase*". With respect to visual impact, **ES Volume 1, Chapter 8: LVIA [APP-060]** identifies that there would be some significant effects on the visual amenity of users of some localised footpaths, as a result of the Scheme. This predominantly relates to locations where footpaths diagonally cross fields and mitigation planting

Reference	Theme	Comments/Issues Raised	Applicant's Response
			would be inappropriate to landscape character and the legacy landscape. A detailed assessment of the likely significance of effects from the Scheme on the use and desirability of individual PRoW and recreational access to the countryside is included in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** and **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]**. This assessment considers the impact on individual recreational routes, including their practical use, enjoyment and desirability. The Applicant confirms that the majority of significant adverse effects can be mitigated. However, some significant adverse effects to users of PRoW and unsurfaced roads in Lime Down E during construction cannot be mitigated further. No significant residual effects are anticipated during the operational phase of the Scheme. The Applicant confirms that existing PRoW are to be controlled within the Scheme design, with management measures set out in the **Outline Public Rights of Way and Permissive Paths Management Plan (PROWPPMP) [APP-282]**, confirmed as embedded mitigation in Section 16.9 of ES Chapter 16. New permissive access routes have been incorporated into the Scheme design, shown as Work No. 10 on the **Works Plan [APP-007]** and illustrated on **ES Volume 2, Figure 3-4: Landscape and Ecology Mitigation Plan [APP-084]**. These are identified as additional mitigation and enhancement measures in Section 16.11 of ES Chapter 16. The PRoW and Permissive Paths Management Plan is secured through Requirement 16 of Schedule 2 of the **Draft Development Consent Order [APP-016]**. The preparation, approval and implementation of the detailed Construction Environmental Management Plan and Construction Traffic Management Plan, substantially in accordance with the outline

Reference	Theme	Comments/Issues Raised	Applicant's Response
			plans, are secured through Requirements 13 and 15 respectively in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that impacts on PRoW and recreational routes are appropriately managed during construction. The approach to recreation and access has been discussed with Wiltshire Council's Public Health team and is under discussion with Wiltshire Council's Countryside Access Team and is set out in the relevant Statement of Common Ground to be submitted at Deadline 1. The height of the solar PV panels has been assessed using clearly defined design parameters, including a maximum height of 4.5 metres above ground level at maximum tilt, as set out in **ES Volume 1, Chapter 3: The Scheme [APP-055]**. These parameters represent a realistic worst-case scenario for the purposes of the Environmental Impact Assessment. The landscape and visual effects of the Scheme, including the effects of the maximum panel height, are assessed in the Landscape and Visual Impact Assessment (LVIA) presented in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**. The LVIA assesses effects on identified landscape and visual receptors during construction, operation and decommissioning, using the maximum design parameters to ensure a robust assessment. Mitigation measures to address landscape and visual effects, including measures that reduce the perceived height and prominence of panels in views, are set out in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060], Figure 3-4-1 to 3-4-5.2 Landscape and Ecology Mitigation Plan [APP-084]** and detailed within the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]**. These include new and enhanced planting, retention of existing hedgerows and

Reference	Theme	Comments/Issues Raised	Applicant's Response
			woodland, and landscape integration measures to reduce visual effects over time. The preparation, approval and implementation of the detailed Landscape and Ecological Management Plan, substantially in accordance with the **OLEMP [APP-283]**, are secured through Requirement 7 in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that the identified mitigation measures are delivered and maintained throughout the lifetime of the Scheme. Further detail on visual amenity is provided in the Applicant's response below.
SPC-003	Landscape and Visual	The open, rolling landscape will be covered by a sea of black panels. Mitigating the visual impact will be impossible. There is also the constant noise pollution that will be generated by a large number of moving panels. substations and battery storage in what is a tranquil environment. The substations and battery storage system will be industrial in scale and totally out of keeping with a landscape that border the Cotswolds National Landscape.	The landscape and visual effects of the Scheme, including the effectiveness of proposed mitigation, are assessed in the Landscape and Visual Impact Assessment (LVIA) presented in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**. The LVIA assesses the Scheme using realistic worst-case design parameters and identifies where significant effects may occur, taking into account embedded mitigation. The Scheme design has been informed by an iterative design process and incorporates a comprehensive package of embedded mitigation measures to avoid, reduce and mitigate landscape and visual effects. These measures include sensitive siting, reductions to the Scheme boundary, minimum offsets from key receptors, retention of existing vegetation, and the provision of new landscape planting and enhancement. The LVIA assesses the effectiveness of these mitigation measures over time and concludes that, in many locations, landscape and visual effects would reduce as mitigation planting establishes and matures. NPS EN-1 recognises at para 5.10.5 that "*Virtually all nationally significant energy infrastructure projects will have adverse effects on the landscape, but there*

Reference	Theme	Comments/Issues Raised	Applicant's Response
			may also be beneficial landscape character impacts arising from mitigation." Details of the mitigation measures and their long-term management are set out in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**, Figure 3-4-1 to 3-4-5.2 **Landscape and Ecology Mitigation Plan [APP-084]** and the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]**. The preparation, approval and implementation of the detailed Landscape and Ecological Management Plan, substantially in accordance with the **OLEMP [APP-283]**, are secured through Requirement 7 in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that the identified mitigation measures are delivered and maintained throughout the lifetime of the Scheme. An assessment of the effects of the Scheme on noise and vibration is provided in **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**, with supporting technical information supplied in **ES Volume 3, Appendix 14-4: Noise Modelling [APP-237]**. The assessment considers potential noise and vibration impacts during construction, operation and decommissioning, including from solar PV panels and associated infrastructure. The Applicant notes that the approach to noise and vibration has been discussed with Wiltshire Council, as described in Section 14.2 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**. <u>Construction phase</u>

Reference	Theme	Comments/Issues Raised	Applicant's Response
			The noise and vibration impacts arising from construction activities are assessed in Section 14.10 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**. For the purposes of the assessment, a reasonable worst-case scenario assuming piling activities has been considered. Mitigation measures associated with construction activity are presented in Section 14.9 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]** and are committed to through the **Outline Construction Environmental Management Plan [APP-277]**. With these measures in place, the assessment concludes that no significant effects from construction noise or vibration are expected. A noise monitoring programme agreed with Wiltshire Council will be carried out during construction. The preparation, approval and implementation of the Construction Environmental Management Plan, substantially in accordance with the **Outline CEMP [APP-277]**, is secured through Requirement 13 in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that construction noise and vibration are appropriately controlled. <u>Operational phase</u> The noise impacts from the operation of the Scheme and its components are assessed in Section 14.10 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**, with supporting modelling provided in **ES Volume 3, Appendix 14-4: Noise Modelling [APP-237]**. A penalty has been applied to predicted noise levels from the Solar PV Sites to account for the distinctive nature of the sound. Potential mitigation measures are detailed in Section 14.9 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**, and with such measures in place, significant effects from operational noise are not expected.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			The **Outline Operational Environmental Management Plan [APP-278]** commits to noise levels from the Scheme at residential dwellings being the same as or below those modelled in the ES. This provides assurance that significant effects from operational noise will be avoided, while allowing flexibility in how this is achieved. The preparation, approval and implementation of the detailed OEMP, substantially in accordance with the outline plan, are secured through Requirement 14 of Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring operational noise is appropriately controlled throughout the lifetime of the Scheme. The Cotswolds National Landscape (CNL) is fully assessed as a standalone receptor within **ES Volume 3, Appendix 8.6: Assessment of Effects on the Special Qualities of the Cotswolds National Landscape [APP-197]**. This assessment considers the effects of the Scheme on landscape character, visual amenity and the special qualities of the CNL, including tranquillity. The assessment found that there would be some short term impact to landscape character within the setting of the CNL but due to the avoidance measures embedded within the Scheme, harm to the CNL itself would be minimal with beneficial effects in the long term which would further the purposes of the designation. In respect of visual amenity, some short-term adverse effects would be experienced by a small number of visual receptors with views to and from the CNL. However, these would reduce over time as a result of the proposed mitigation. The assessment of effects on the special qualities of the CNL scoped out 3 SQs as there is no association with the Site. The assessment found that there are no direct effects on the

Reference	Theme	Comments/Issues Raised	Applicant's Response
			remaining SQs. There are some Minor/ Negligible short-term effects on a small number of visual receptors within the setting of the CNL which effect SQ7 -Tranquillity and SQ13 Archaeology and historic associations. However, these effects are mitigated by Year 15 when proposed vegetation has matured. The assessment also found that there would be beneficial effects on SQ 6 – Biodiversity and nature recovery as a result of the delivery of approximately 119.7 hectares of flower-rich neutral grassland (as defined in the BNG assessment) and SQ 12 - An accessible landscape as a result of the delivery of approximately 12.8km of new permissive paths within the setting of the CNL. The remaining SQs would remain entirely intact. The Scheme was refined through an iterative design process to avoid and reduce effects on the CNL and its setting. Panels along the edge of the CNL were removed from the Order Limits in fields C2, C3 and C4 where significant visual effects on receptors within the CNL were identified. Panels were also removed from fields C1, C6, C8, the western section of C9 and the majority of C10, with this land now proposed for ecological mitigation to protect the setting of the CNL. In addition, panels within fields A11 and A12 were removed and the land repurposed for ecological mitigation to protect the setting of the CNL towards Sherston. All land parcels adjacent to the CNL are proposed to deliver habitat enhancement, informed by the CNL Management Plan and the Cotswolds National Landscape Strategy and Guidelines, to further the purposes of the designation. Details of the proposed landscape and ecological mitigation and enhancement measures are provided in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**, Figure 3-4-1 to 3-4-5.2 **Landscape and Ecology Mitigation Plan [APP-084]** and the **Outline Landscape and Ecological Management Plan**

Reference	Theme	Comments/Issues Raised	Applicant's Response
			(OLEMP) [APP-283], and the **Outline Ecological Protection and Mitigation Strategy (EPMS) [APP-284]**. The preparation, approval and implementation of the detailed Landscape and Ecological Management Plan, substantially in accordance with the **OLEMP [APP-283]**, are secured through Requirement 7 in Schedule 2 of the **Draft Development Consent Order [APP-016]**. The preparation, approval and implementation of the detailed Ecological Protection and Mitigation Strategy, substantially in accordance with the **EPMS [APP-284]**, are secured through Requirement 8 in Schedule 2 of the **Draft Development Consent Order [APP-016]**. These requirements ensure that the identified mitigation and enhancement measures are delivered and maintained throughout the lifetime of the Scheme.
SPC-004	Soils and Agriculture	Loss of Productive Farmland Approximately 30% of the farmland is 'best and most versatile' farmland. The removal of this high-quality farmland for decades at a time is not compatible with sustainable planning.	The effects of the Scheme on agricultural land, including Best and Most Versatile (BMV) agricultural land, are assessed in **ES Volume 1, Chapter 17: Soils and Agriculture [APP 069]**, supported by **ES Volume 3, Appendix 17 1: Agricultural Land Classification and Soil Resource Survey Report [APP 243]**. . The Scheme would result in the long-term but temporary loss of agricultural use of the land, which would be reinstated as far as practicable following decommissioning. National planning policy recognises the economic and other benefits of BMV agricultural land and encourages the use of lower quality land where possible; however, agricultural land quality is one of a number of sustainability considerations to be weighed in the planning balance. The consideration of alternative sites, including the availability and suitability of land of lower agricultural quality, is set out in **ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP 056]** and ES Volume 3, Appendix 4 1: Site Selection Assessment Report **[APP 185].**
SPC-005	Soils and Agriculture	With growing concerns over food supply and national resilience, we	The effects of the Scheme on agricultural land, including land quality and productivity, are assessed in **ES Volume 1, Chapter**

Reference	Theme	Comments/Issues Raised	Applicant's Response
		should not be trading productive soil for imported food while leaving roofs, brownfield sites, and degraded land underused for renewable generation – especially when national targets for solar energy can be met by prioritising those more suitable locations first, as stated by the Council for the Protection of Rural England.	**17: Soils and Agriculture [APP-069]**, supported by **ES Volume 3, Appendix 17-1: Agricultural Land Classification and Soil Resource Survey Report [APP-243]**. That assessment identifies that the majority of agricultural land affected is not Best and Most Versatile (BMV) land, comprising predominantly Subgrade 3b and Grade 4 land, which is not considered high-quality agricultural land in planning terms. Government-led agricultural initiatives, such as the Sustainable Farming Incentive which is relaunching later in 2026, have prioritised soil health, environmental enhancement and climate resilience, recognising that long-term food security is influenced by a range of factors beyond land take alone, including soil condition, climate change and environmental pressures. The Scheme allows soils to remain in situ and undisturbed during operation, supporting soil recovery and long-term land health, with land reinstated and returned to agricultural use as far as practicable following decommissioning. No permanent loss of agricultural land is anticipated. The Applicant does not consider that food security will be compromised by the Scheme (or solar energy more widely). The latest figures to September 2024 indicate that solar occupied around 21,200 ha of agricultural land in the UK. In 2025, 545,000 ha of arable land in England were left uncropped (source: Department for Environment, Food & Rural Affairs, Agricultural land use in England at 1 June 2025). It should also be noted that food security is not identified as an issue within the suite of Energy National Policy Statements or the National Planning Policy Framework (NPPF). Further, the Government's UK Solar Roadmap (2025) states that solar development is not considered to compromise food security, but that the climate and nature crisis poses the greatest long-term risk to food security- a risk which the Scheme directly

Reference	Theme	Comments/Issues Raised	Applicant's Response
			helps to address by providing a secure, low-carbon source of electricity. As set out in Section 2 of the **Outline Decommissioning Strategy [APP-279],** post-decommissioning of the Scheme, the landowners would choose how the land is to be used and managed. The landowner may return all of the land to arable use, although it is likely that established habitats such as hedgerows and woodland would be retained given their potential benefits to agricultural land and the wider farming estate. Site selection is addressed in **ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP-056]** and **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]**. Paragraph 2.10.31 *at this scale, it is likely that applicant's developments will use some agricultural land. Applicants should explain their choice of site, noting the preference for development to be on suitable brownfield, industrial and low and medium grade agricultural land.* **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]** explains how brownfield land, industrial land, previously developed land, and low-grade agricultural land were considered, policy. As set out in **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]** the Applicant reviewed brownfield land registers for local authorities within the area of search including Wiltshire Council, South Gloucestershire Council, Bath and Northeast Somerset Council, and Somerset Council. The assessment concluded that there were no sites within the search area of sufficient size to accommodate a large-

Reference	Theme	Comments/Issues Raised	Applicant's Response
			scale solar development, either individually or cumulatively. The sites assessed were too small to support the proposed Scheme and were largely allocated for housing or mixed-use development, in line with local planning policies, thereby creating a conflict with the intended use for renewable energy infrastructure. Therefore, it was concluded that there was no available or suitable brownfield land for the purposes of the Scheme.

5.13 Hullavington Parish Council

Table 5-13 RR-1905

Reference	Theme	Comments/Issues Raised	Applicant's Response

HPC-001	Description and DCO Process	Analysis of Hullavington's Objections to the Lime Down Solar Park Introduction This report sets out the primary concerns raised by Hullavington Parish Council and residents regarding the proposed Lime Down Solar Park. The proposal attracts numerous broad objections, including the threat it poses to national food security and the disruption it would cause to the established pattern of rural settlements in this part of the South Cotswolds. This landscape is not an empty expanse, but a network of small villages and hamlets separated by productive agricultural fields that maintain each community's distinct identity.	The Applicant acknowledges that there will be impacts on the community as a result of the Scheme, which may be a source of concern for local residents. The Secretary of State will balance those potential impacts and changes against the urgent need and critical national priority for the Scheme as set out in Government policy. The Applicant has assessed adverse impacts arising from the Scheme and has also set out within the **ES [APP-052 – APP-065]** the steps taken to avoid, mitigate and minimise these impacts as far as possible, and has prepared a number of management plans that will ensure that impacts are kept to a minimum. These management plans are secured in the **Draft Development Consent Order [APP-016]**. Hullavington Parish Council's specific concerns about community and food security and addressed by the Applicant in the responses below.
HPC-002	Description and DCO Process	The name *"Lime Down"* itself is misleading. It implies a single, wide-open area suitable for large scale industrial development, yet no such landscape exists here. Instead, the proposal would effectively industrialise the fields that currently provide separation between villages, overwhelming these rural communities and erasing the green spaces that define them.	The Applicant notes this Comment. As set out in **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]**, the Applicant undertook an initial review which did not identify a single site of the appropriate size (1,100 ha) within the area of search. Therefore, the Applicant considered both contiguous land parcels and land parcels near one another. The **Statement of Need [APP-266]** explains at Section 7.4 that NSIP proposals may comprise adjoining or separate parcels of land and that "*the connection of separate parcels of suitable land together into a single scheme may, subject to analysis, enable those parcels of land to connect economically to the electricity system*" which is the case for this Scheme. Section 8.2 of the **Statement of Need [APP-266]** explains that by bringing the parcels together into a single scheme, the Scheme is able to carry a connection to the National Electricity Transmission System (NETS), thus providing a local source of low carbon electricity and also enabling the efficient bulk transfer

			of energy generated at the Scheme so that any surplus can be used to cover shortfalls elsewhere. By connecting to the NETS, the Scheme will not impact the feasibility or timing of distribution network connections for either new generation or consumption connections which among other things are required to support the delivery of Wiltshire County Council's growth plans. An assessment of landscape and visual effects is provided in the Landscape and Visual Impact Assessment (LVIA) presented in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**. The LVIA assesses effects on identified landscape and visual receptors, including residential properties and users of public rights of way, and identifies where significant effects may occur. The LVIA found no significant long term visual effects to Residential Properties as a consequence of the Scheme. The scale of development within the Order Limits has been significantly reduced from the layout assessed in the Preliminary Environmental Information Report (PEIR) through an iterative design process undertaken in response to consultation and in accordance with the mitigation hierarchy to avoid, reduce and mitigate adverse effects. As part of this design evolution, panels along the edge of the Cotswolds National Landscape and along the Fosse Way have been removed. Mitigation measures to address landscape and visual effects are set out in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**, **Figure 3-4-1 to 3-4-5.2 Landscape and Ecology Mitigation Plan [APP-084]** and detailed within the **Outline Landscape and Ecological Mitigation Plan (LEMP) [APP-283]** and the **Outline Ecological Protection and Mitigation Strategy (EPMS) [APP-284]**. These documents include proposals for new and enhanced planting, retention of existing hedgerows and woodland, and landscape integration measures to reduce visual effects over time. In addition, the Scheme design incorporates minimum offsets from existing landscape features, including residential properties,

			ancient woodland, woodland, hedgerows, public rights of way and watercourses, to further limit visual impacts. The preparation, approval and implementation of detailed landscape and ecological management plans, substantially in accordance with the **OLEMP [APP-283]** and **EPMS [APP-284]**, are secured through requirements in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that the identified mitigation measures are delivered and maintained throughout the lifetime of the Scheme.
HPC-003	Site Selection and Alternatives	Within this wider context, the Parish of Hullavington faces a particularly disproportionate and unacceptable burden. The proposed location of the Battery Energy Storage System (BESS) and the construction traffic and access arrangements place significant and permanent risks on the parish's quality of life and safety. The overall assessment is that the industrialisation of the landscape immediately adjacent to Hullavington would have enduring and harmful consequences for the community.	The assessment in **ES Chapter 18: Human Health [APP-070]** has considered the location specific impacts of onsite infrastructure, and has identified Hullavington as one of the communities most likely to be affected by the Scheme. Indeed, the assessment considers Hullavington as a community of greater sensitivity to changes in its visual surroundings due to its current rural setting, and the anticipated extent to which the Scheme will change that character and potentially the quality of life for residents and visitors. The assessment considers that whilst this effect would be long-term throughout the Scheme's construction, operational and decommissioning phases, it is not anticipated to be a significant adverse effect to mental health and wellbeing. With regard to safety from BESS, **ES Chapter 18: Human Health [APP-070]** has considered the impact to health and wellbeing from air quality, fire or explosion impacts (informed by **Chapter 15: Air Quality [APP-067]** and **Chapter 20: Other Environmental Matters (Major Accidents and Disasters) [APP-072]).** As a result of updated Scheme design for DCO submission, BESS infrastructure more than 500 m from the nearest dwelling. At this distance, the effects to health and wellbeing from BESS are largely mitigated by virtue of distance, and as such, there are no significant adverse effects to human health anticipated as a result of the Scheme.

			Moreover, measures to control BESS fire emissions are outlined in the **Outline Battery Safety Management Plan [APP-286].** This includes measures to limit human exposure to air pollution in the event of a fire. The preparation, approval and implementation of the detailed Battery Safety Management Plan, substantially in accordance with the outline plans, are secured through requirements in Schedule 2 of the **Draft DCO [APP-016].** With regard to road safety, **ES Chapter 18: Human Health [APP-070]** has relied upon the assessment outcomes in **ES Chapter 13: Transport and Access [APP-065].** While this has identified an increase in HGV and car and van movements through Hullavington (albeit no HGV movements along The Street), the likely effect on road safety for vehicular and non-motorised users, and increases in fear and intimidation as a result of HGV traffic, is considered to be a minor adverse effect, and is therefore not significant.
HPC-004	Soils and Agriculture	Project Scale and Proximity The sheer scale of the proposed development is the foundational objection. The project would cover over 2,000 acres of predominantly agricultural land, fundamentally changing the rural character of the area. This figure rises to 3,000 acres when the cable run is considered.	The Scheme would require the long-term but temporary use of agricultural land. The Lime Down Solar Sites are dispersed in nature and have limited intervisibility with each other due to the rolling topography. In the assessment of effects for the 1km Local Study Area in Table 2.2 of **Appendix 8-3-2-2 [APP-191]** it is noted that "*Construction activities would have an impact locally, and the change in land use from arable farmland to a solar scheme would cause a noticeable change to the character of the 1km Local Study Area. There would be short term Moderate Adverse effects during the construction phase*". These effects of the Scheme on the character of the landscape are reduced by Year 15 as a result of the extensive mitigation and enhancement measures as set out in the **Landscape and Ecology Mitigation Plans [APP-084]**. These mitigation measures would provide Beneficial effects to the fabric of the Site which upon decommissioning would provide the long-term legacy landscape. The landscape and visual effects of the Cable Route Corridor will be temporary in nature and are set out in **Appendix 8-3-4 of the**

			ES: Landscape and Visual Assessment Sheets - Cable Route Corridor [APP-193]. Mitigation measures to address landscape and visual effects are set out in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**, **Figure 3-4-1 to 3-4-5.2 Landscape and Ecology Mitigation Plan [APP-084]** and detailed within the **Outline Landscape and Ecological Mitigation Plan (LEMP) [APP-283]** and the **Outline Ecological Protection and Mitigation Strategy (EPMS) [APP-284]**. These documents include proposals for new and enhanced planting, retention of existing hedgerows and woodland, and landscape integration measures to reduce visual effects over time. In addition, the Scheme design incorporates minimum offsets from existing landscape features, including residential properties, ancient woodland, woodland, hedgerows, public rights of way and watercourses, to further limit visual impacts. The preparation, approval and implementation of detailed landscape and ecological management plans, substantially in accordance with the **OLEMP [APP-283]** and **EPMS [APP-284]**, are secured through requirements in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that the identified mitigation measures are delivered and maintained throughout the lifetime of the Scheme.

HPC-005	Landscape and Visual	Industrial Proximity A major concern for Hullavington is the proximity of the development, particularly the BESS and solar arrays, which are proposed to be situated just 300 meters from residential homes. This immediate adjacency to an industrial-scale energy facility is considered unacceptable and destructive to the peaceful, rural environment.	Alternative sites for the BESS are discussed in **ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP-056].** The location of the BESS was determined through an options appraisal and iterative design process, having regard to technical requirements, environmental constraints and potential effects on nearby receptors. The BESS Area is located at Lime Down D, close to the Solar PV Sites and the on-site substation, which provides operational and efficiency benefits, including minimising transmission losses, maximising storage efficiency, supporting grid balancing, and enabling a rapid and reliable response to network fluctuations. Among the options considered for co-locating the BESS with the Solar PV Sites, Lime Down D was identified as the preferred location due to its central position within the Scheme, the presence of existing and proposed screening, its limited proximity to many residential properties, and its relationship with existing infrastructure, including the adjacent railway line. The various chapters of the **ES [APP-052 to APP-265]** assess the likely significant effects arising from the BESS at this location and identify mitigation measures where necessary. Overall, the assessment concludes that the siting of the BESS at Lime Down D presents the lowest potential for significant adverse effects when compared with reasonable alternatives.

HPC-006	Landscape and Visual	Element Scale / Measurement Implication Land Coverage 2,000+ acres Permanent (60 year) destruction of rural landscape and habitat. BESS Height ~3.5 meters Massive visual intrusion compared to existing rural architecture. Panel height 3.5 – 4.5 meters large areas covered and will be visible from many miles away, completely changing the landscape. Substation Height 4.8m Visible from many miles away, completely changing the landscape.	An assessment of landscape and visual effects are presented in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**. The Landscape and Visual Impact Assessment (LVIA) assesses effects on identified landscape and visual receptors, including residential properties, users of public rights of way and roads, and identifies where significant effects may occur. The LVIA found no significant long term visual effects to residential properties as a consequence of the Scheme. The visual effects of the Scheme are summarised in **ES Volume 3, Appendix 8-3-3 [APP-192]**. Temporary Major/Moderate and Moderate Adverse effects on visual receptors have been recorded across the Scheme during construction and at Year 1. However, for the majority of these receptors, the effects reduce to non –significant levels as a result of the embedded mitigation measures which are set out in Section 8.9 of **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]** and include landscape buffers, retention of existing hedgerows and woodland, and new planting to provide screening and integration over time. The assessment also identifies that there would be some long-term significant effects on the visual amenity of users of some localised footpaths, as a result of the Scheme. This predominantly relates to locations where footpaths diagonally cross fields and mitigation planting would be inappropriate to landscape character and the legacy landscape. Those receptors which would experience Significant Long Term Visual Effects are listed in Table 8-30 of the **LVIA [APP-060].** The scale of development within the Order Limits has been significantly reduced from the layout assessed in the Preliminary Environmental Information Report (PEIR) through an iterative design process undertaken in response to consultation and in accordance with the mitigation hierarchy to avoid, reduce and mitigate adverse effects. As part of this design evolution, panels along the edge of the Cotswolds National Landscape and along the Fosse Way have been removed.

			Mitigation measures to address landscape and visual effects are set out in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**, **Figure 3-4-1 to 3-4-5.2 Landscape and Ecology Mitigation Plan [APP-084]** and secured within the **Outline Landscape and Ecological Mitigation Plan (LEMP) [APP-283]** and the **Outline Ecological Protection and Mitigation Strategy (EPMS) [APP-284]**. These documents include proposals for new and enhanced planting, retention of existing hedgerows and woodland, and landscape integration measures to reduce visual effects over time. In addition, the Scheme design incorporates minimum offsets from existing landscape features, including residential properties, ancient woodland, woodland, hedgerows, public rights of way and watercourses, to further limit visual impacts. Although these measures reduce the effects of the Scheme on nearly all receptors, as noted above there are 10 receptors which would experience Significant Visual Effects for the duration of the Scheme as set out Table 8-30 of the **LVIA [APP-060]**. Mitigation measures to address landscape and visual effects are set out in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**, **Figure 3-4-1 to 3-4-5.2 Landscape and Ecology Mitigation Plan [APP-084]**. The preparation, approval and implementation of detailed landscape and ecological management plans, substantially in accordance with the **OLEMP [APP-283]** and **EPMS [APP-284]**, are secured through requirements in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that the identified mitigation measures are delivered and maintained throughout the lifetime of the Scheme.
HPC-007	Other Environmental Matters	Residential Proximity 300 meters Direct impact on noise, light, Pand safety for nearest residents. Local school - disruption during preparation, construction and operational life.	**ES Chapter 18: Human Health [APP-070]** has relied upon the assessment outcomes in other technical chapters and sections of the ES to determine the likely effects on safety, health and wellbeing. Subject to the implementation of all mitigation measures as secured through the requirements in Schedule 2 to the **Draft DCO [APP-016]**, there are no residual significant adverse effects on human health. As this has been applied to

			assessment of the general population and vulnerable sub-populations, this is also anticipated to apply to schoolchildren. The **Outline Operational Environmental Management Plan [APP-278]** commits to noise levels from the Scheme at residential dwellings being below levels considered significant. This provides assurance that operational noise from the Scheme will be in line with or below existing sound levels in the area, while allowing flexibility in how this is achieved. **ES Volume 1, Chapter 18: Human Health [APP-070]** has relied upon the assessment outcomes in **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]** to determine that noise effects during the operational lifetime of the Scheme are anticipated to be no greater than a long-term minor/negligible adverse effect to receptors of the highest sensitivity. This is not a significant effect and is not anticipated to generate any increased human health effect over the duration of the operational phase of the Scheme. Potential effects relating to lighting are assessed in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**, which considers the implications of construction, operational and decommissioning lighting on landscape and visual receptors. The Landscape and Visual Impact Assessment (LVIA) has considered the construction, operational and decommissioning lighting proposals for the Scheme, with details of lighting design, directionality and intermittent lighting set out in **ES Volume 1, Chapter 3: The Scheme [APP-055]**. The Scheme has been designed to minimise the need for external lighting. Lighting is not required within the Solar PV Arrays during the operational phase. Motion-sensing security lighting will be provided within substations and the BESS Area and will be used only for maintenance and security purposes. Temporary site lighting during construction and decommissioning will be required to enable safe working during hours of darkness. This lighting will be designed, as far as reasonably practicable, to minimise light spill outside the Site and Cable Route Corridor,

			particularly towards residential properties, highways and ecological receptors. Standard good practice measures will be employed to minimise glare and light spill during construction, operation and decommissioning. There will be no lighting on perimeter fencing. Measures to control construction lighting are set out in the **Outline Construction Environmental Management Plan [APP-277]**, and operational lighting controls form part of the **Outline Operational Environmental Management Plan [APP-278]**. The preparation, approval and implementation of detailed management plans, substantially in accordance with these outline plans, are secured through requirements in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring lighting impacts are appropriately controlled throughout the lifetime of the Scheme.
HPC-008	Other Environmental Matters	Critical Impacts of the Battery Energy Storage System (BESS) The relocation of the BESS facility to an area north of Hullavington has intensified local opposition. The facility, designed to store electrical energy, presents three core concerns: visual intrusion, noise pollution, and safety.	The assessment in **ES Chapter 18: Human Health [APP-070]** has considered the location specific impacts of onsite infrastructure, and has identified Hullavington as one of the communities most likely to be affected by the Scheme. Indeed, the assessment considers Hullavington as a community of greater sensitivity to changes in its visual surroundings due to its current rural setting, and the anticipated extent to which the Scheme will change that character and potentially the quality of life for residents and visitors. The assessment considers that whilst this effect would be long-term throughout the Scheme's construction, operational and decommissioning phases, it is not anticipated to be a significant adverse effect to mental health and wellbeing. With regard to safety from BESS, **ES Chapter 18: Human Health [APP-070]** has considered the impact to health and wellbeing from air quality, fire or explosion impacts (informed by **Chapter 15: Air Quality [APP-067]** and **Chapter 20: Other Environmental Matters (Major Accidents and Disasters) [APP-072]).** As a result of updated Scheme design for DCO submission, BESS infrastructure is more than 500 m away from the nearest dwelling. At this distance, the effects to health and wellbeing from BESS are largely mitigated by virtue of distance,

			and as such, there are no significant adverse effects to human health anticipated as a result of the Scheme. Moreover, measures to control BESS fire emissions are outlined in the **Outline Battery Safety Management Plan [APP-286].** This includes measures to limit human exposure to air pollution in the event of a fire. The preparation, approval and implementation of the detailed Battery Safety Management Plan, substantially in accordance with the outline plans, are secured through requirements in Schedule 2 of the **Draft DCO [APP-016].** With reference to the visual intrusion of the BESS, the visual effects of the Scheme have been robustly assessed in **Chapter 8: Landscape and Visual [APP-060]**. Significant visual effects are recorded in **Appendix 8-3-2-2 Landscape and Visual Assessment Sheets (Significant) [APP-191].** The Scheme includes significant embedded mitigation measures to reduce the visual effects of the Scheme as set out in Section 8.9 of **ES Volume 1, Chapter 8: Landscape and Visual [APP-060].** This includes landscape buffers, retention of existing hedgerows and woodland, and new planting to provide screening and integration over time.
HPC-009	Noise and Vibration	Noise and Acoustic Pollution: The 'Incessant Hum' The tranquillity of the Hullavington area is currently defined by a very low ambient noise environment. The introduction of the BESS is expected to permanently (60 years) compromise this through continuous acoustic emissions.	The **Outline Operational Environmental Management Plan [APP-278]** commits to noise levels from the Scheme at residential dwellings being below levels considered significant. This provides assurance that operational noise from the Scheme will be in line with or below existing sound levels in the area, while allowing flexibility in how this is achieved. While it is true that substation transformers can produce a low-frequency hum, the **Outline Operational Environmental Management Plan [APP-278]** commits to these being over 400 m away from properties and therefore, as stated in Paragraph 14.6.29 **of ES Volume 1, Chapter 14: Noise and Vibration [APP-066],** transformers are not the dominant noise source at dwellings.
HPC-010	Noise and Vibration	The operation of the BESS is expected to result in higher noise levels at night than during the day from the BESS unit itself. However, when accounting for	With respect to daytime noise, the **Outline Operational Environmental Management Plan [APP-278]** commits to noise levels from the Scheme at residential dwellings being below levels considered significant. This provides assurance that

		the entire site's operations, the highest noise levels overall will be during the daytime. Consequently, the surrounding area will experience constant noise disturbance, with no designated quiet respite period, including overnight.	operational noise from the Scheme will be in line with or below existing sound levels in the area, while allowing flexibility in how this is achieved. With reference to Table 7 of **ES Volume 3, Appendix 14-4 Noise Modelling [APP-237] and ES Volume 2, Figure 14-3 Night-time Operational Noise Contours [APP-161**], night-time noise levels from the Scheme are likely to be between 5 and 32 dB external to residential dwellings, broadly equivalent to a quiet library. Such levels are largely below the existing background sound and, with reference to WHO guidelines and BS8233 Guidance on sound insulation and noise reduction for buildings, conducive to a good night's sleep, even with the windows open.
HPC-011	Noise and Vibration	• Source and Nature of Noise: The noise is primarily generated by the BESS's essential operational components, specifically cooling systems (fans), inverters, and transformers. These components operate constantly to manage the temperature and flow of electricity within the batteries. The resulting sound profile is not a sudden, transient noise but an incessant, wide-frequency tonal noise often described as a "*humming*" or *"whine*."	Noise from the BESS containers, inverters and conversion units is relatively broadband as evidenced by Table 6 **of ES Volume 3, Appendix 14-4 Noise Modelling [APP-237**]. While it is true that substation transformers can produce a low-frequency hum, the **Outline Operational Environmental Management Plan [APP-278]** commits to these being over 400 m away from properties and therefore, as stated in Paragraph 14.6.29 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**, transformers are not the dominant noise source at dwellings.

HPC-012	Noise and Vibration	• Impact on Residents: Given the BESS's placement only 300 meters from residential properties, this constant noise is predicted to be clearly audible day and night. The primary effects are a significant loss of amenity and the destruction of the local soundscape, leading to interference with sleep, reduced quality of life, and an inability to enjoy gardens or open windows without disturbance.	With reference to Table 8 and Table 9 of **ES Volume 3, Appendix 14-4 Noise Modelling [APP-237]** noise from the Scheme is expected to be around the background sound level during the day and below the existing background sound level at the vast majority of receptors at night. Considering that the background sound level is the level exceeded 90% of the time at the moment, the Scheme is unlikely to be audible throughout the day and night. With reference to Table 7 of **ES Volume 3, Appendix 14-4 Noise Modelling [APP-237]** and **ES Volume 2, Figure 14-3 Night-time Operational Noise Contours [APP-161**], night-time noise levels from the Scheme are likely to be between 5 and 32 dB external to residential dwellings. Such levels are largely below the existing background sound and, with reference to WHO guidelines and BS8233 Guidance on sound insulation and noise reduction for buildings, conducive to a good night's sleep, even with the windows open. **ES Volume 1, Chapter 18: Human Health [APP-070]** has relied upon the assessment outcomes in **ES Volume 1, Chapter 14: Noise and Vibration {APP-066]** to determine that noise effects during the operational lifetime of the Scheme are anticipated to be no greater than a long-term minor/negligible adverse effect to receptors of the highest sensitivity. This is not a significant effect and is not anticipated to generate any increased human health effect over the duration of the operational phase of the Scheme.
HPC-013	Noise and Vibration	What steps will IGP take to ensure residents are not impacted by noise from the BESS during the night?	With respect to night-time noise from BESS, the **Outline Operational Environmental Management Plan [APP-278**] commits to levels from the Scheme at residential dwellings being below levels presented in the ES. As described in Section 14.9 **of ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**, this is likely to require silencer units on BESS Inverters and most of BESS Containers. With reference to Table 7 of **ES Volume 3, Appendix 14-4 Noise Modelling [APP-237**] and **ES Volume 2, Figure 14-3 Night-time Operational Noise Contours [APP-161**], these

			levels are likely to be between 5 and 32 dB external to residential dwellings and around 10 dB lower still internally. Such levels are largely below the existing background sound and, with reference to WHO guidelines and BS8233 Guidance on sound insulation and noise reduction for buildings, conducive to a good night's sleep, even with the windows open.
HPC-014	Noise and Vibration	What steps will IGP take to ensure residents are not impacted unduly by noise during the day, both during construction and during operation?	Mitigation measures associated with construction activity are presented in Section 14.9 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]** and are committed to through the **Outline Construction Environmental Management Plan [APP-277].** With these measures in place, the assessment concludes that no significant effects from construction noise or vibration are expected. A noise monitoring programme agreed with Wiltshire Council will be carried out during construction. The preparation, approval and implementation of the Construction Environmental Management Plan, substantially in accordance with the **Outline CEMP [APP-277],** is secured through Requirement 13 in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that construction noise and vibration are appropriately controlled. Potential operational mitigation measures are detailed in Section 14.9 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066],** and with such measures in place, significant effects from operational noise are not expected. The **Outline Operational Environmental Management Plan [APP-278]** commits to noise levels from the Scheme at residential dwellings being the same as or below those modelled in the ES. This provides assurance that significant effects from operational noise will be avoided, while allowing flexibility in how this is achieved. The preparation, approval and implementation of the detailed OEMP, substantially in accordance with the outline plan, are secured through Requirement 14 of Schedule 2 of the **Draft**

			Development Consent Order [APP-016], ensuring operational noise is appropriately controlled throughout the lifetime of the Scheme.

HPC-015	Other Environmental Matters	Visual Intrusion and Light Pollution • Visual Intrusion: The substation is estimated to reach a height of approximately 5 meters, which is entirely inappropriate for the local topography and will result in overwhelming visual intrusion.	With reference to the visual intrusion , the visual effects of the Scheme have been robustly assessed in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**. Significant visual effects are recorded in **Appendix 8-3-2-2 Landscape and Visual Assessment Sheets (Significant) [APP191]** and the visual effects of the Scheme are summarised in ES Volume 3, Appendix 8-3-3 **[APP-192].** Temporary Major/Moderate and Moderate Adverse effects on visual receptors have been recorded across the Scheme during construction and at Year 1. However, for the majority of these receptors, the effects reduce to non –significant levels as a result of the embedded mitigation measures which are set out in Section 8.9 of **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]** and include landscape buffers, retention of existing hedgerows and woodland, and new planting to provide screening and integration over time. The assessment also identifies that there would be some long term significant effects on the visual amenity of users of some localised footpaths, as a result of the Scheme. This predominantly relates to locations where footpaths diagonally cross fields and mitigation planting would be inappropriate to landscape character and the legacy landscape. Those receptors which would experience significant long term visual effects are listed in Table 8-30 of the LVIA **[APP-060].**

HPC-016	Other Environmental Matters	• Light Pollution: Operational lighting required for the BESS site will also create significant light spill, threatening to "*spoil the darkness*" of the clear night sky, further eroding the rural environment.	With reference to operational lighting: Lighting is not required within the Solar Arrays for the operational phase. Motion sensing security lighting will be provided within substations and within the BESS to be used only for maintenance and security purposes. Temporary site lighting during construction will be required to enable safe working during construction and decommissioning during hours of darkness and will be designed as far as reasonably practicable to minimise potential for light spillage outside the Scheme and Cable Corridor, particularly towards houses, traffic and ecological habitats. Standard good practice measures would be employed to minimise light spill, including glare during construction, operation and decommissioning. Refer to section 3.5.12 in Chapter 3 of the **ES Volume1, Chapter 3: The Scheme [APP-055]** for more information on operational lighting.
HPC-017	Other Environmental Matters	What steps will IGP take to ensure visual intrusion is reduced to the minimum and light pollution will not affect the rural, night sky? Operational Safety Concerns	With reference to the visual intrusion of the BESS, the visual effects of the Scheme have been robustly assessed in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**. Significant visual effects are recorded in Appendix 8-3-2-2 **Landscape and Visual Assessment Sheets (Significant) [APP191].** Through the iterative design process, the layout and positioning of infrastructure, including the BESS, has been refined to reduce visual influence. Embedded mitigation measures are set out in Section 8.9 of **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]** and include landscape buffers, retention of existing hedgerows and woodland, and new planting to provide screening and integration over time. The LVIA identifies where significant visual effects would occur and reports residual effects following mitigation. It concludes that visual effects associated with the Scheme, including the BESS, are localised and would reduce over time as mitigation planting establishes.

			With reference to lighting: Lighting is not required within the Solar Arrays for the operational phase. Motion sensing security lighting will be provided within substations and within the BESS to be used only for maintenance and security purposes. Temporary site lighting during construction will be required to enable safe working during construction and decommissioning during hours of darkness and will be designed as far as reasonably practicable to minimise potential for light spillage outside the Scheme and Cable Corridor, particularly towards houses, traffic and ecological habitats. Standard good practice measures would be employed to minimise light spill, including glare during construction, operation and decommissioning. Refer to section 3.5.12 in Chapter 3 of the **ES Volume1, Chapter 3: The Scheme [APP-055]** for more information on operational lighting.
HPC-018	Transport and Access	Unacceptable Traffic and Highway Safety Risks: Active Travel Conflict The developer's plan for construction access relies on the local network of narrow, single-track rural lanes, which is deemed "*physically unfeasible"* for industrial volumes and creates a "*critical danger"* to the community.'	The proposed construction routes have been assessed in **ES Volume 1: Chapter 13: Transport and Access [APP-065]** and **ES Volume 3: Appendix 13-1: Transport Assessment [APP-233]**and are considered to be the most appropriate routes to the Scheme. As concluded in **ES Volume 1: Chapter 13: Transport and Access [APP-065]** Construction traffic would also be temporary and controlled through measures in a CTMP. The assessment presented in Annex H of **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]** demonstrates adequate carriageway width or frequency of passing place opportunity to pass at least an HGV and a light vehicle as requested in comments provided by Wiltshire Council in its response (August 2025) to the Transport Assessment Scoping Note and confirmed in RR4934 Paragraph 4 of 'Appendix A - Highways and Transport Document Review - Detailed Comments'. This confirms that no passing bay or widening improvements are needed to accommodate these movements on the construction route outside of the Order Limits. The assessment presented in Annex H of **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]**

			demonstrates adequate carriageway width or frequency of passing place opportunity to pass at least an HGV and a light vehicle. To provide further comfort, additional information will be added to **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]** and resubmitted at Deadline 1 of Examination to demonstrate that there is adequate carriageway width and/or passing place opportunity for two HGVs when accessing Lime Down Site D. An **oCTMP [APP-287]** and **oPRoWPPMP [APP-282]** support the DCO Application and includes outline measures to ensure impacts to NMU along highways and PRoW are minimised as far as practicable. The **oCTMP [APP-287]** confirms that construction deliveries will be managed to avoid the requirement for HGVs generated by the Scheme passing each other in opposite directions on the local roads and restricted to outside of peak hours. With these measures in place, **ES Volume 1, Chapter 13-1: Transport and Access [APP-065]** concludes that the impact would be negligible to minor adverse. A final CTMP and PRoWPPMP would be prepared post consent and must be substantially in accordance with the **oCTMP [APP-287]** and **oPRoWPPMP [APP-282]**, respectively, and approved by the relevant local planning authorities (in consultation with the relevant highway authorities), as secured by Requirement 15 and Requirement 16 in Schedule 2 of the **Draft DCO [APP-016]**.
HPC-019	Transport and Access	3.1. Construction Traffic Volume is Dangerously Underestimated The applicant's figures fail to reflect the true magnitude of traffic, creating a misleading picture of the disruption and risk.	The Applicant has predicted construction traffic flows for the Scheme based on a realistic breakdown of construction materials, such as aggregate and number of modules. Calculations are provided in Annex E of **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]**. Further detail of trip generation will also be added to **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]** and resubmitted at Deadline 1 of Examination. The transport and access assessment has been completed by competent experts, as detailed in **ES Volume 3, Appendix 1-1:**

			Statement of Competence [APP-180], and is considered to be a robust assessment of the Scheme. The potential effects of construction traffic on the local highway network are assessed in **ES Volume 1, Chapter 13: Transport and Access [APP-065]**, which considers construction vehicle movements, traffic volumes, road safety and effects on road users. This included the capacity of local roads and infrastructure to accommodate construction vehicles with consideration of construction traffic volumes, vehicle types, route suitability, and network performance. The assessment concludes that the level of construction traffic associated with the Scheme is unlikely to materially affect road safety on links within the Study Area, and no significant adverse effects on accident risk are anticipated. The assessment additionally concludes that with appropriate mitigation such as the Construction Traffic Management Plan in place to manage construction vehicle movements, there would be no significant adverse impacts on the local highway network during the construction, operation maintenance, and decommissioning phases of the Scheme. An **Outline Construction Traffic Management Plan (CTMP) [APP-287]** has been prepared and submitted with the DCO application. The aim of the CTMP is to ensure that the effect of the construction phase on the local highway network is minimised. The **Outline CTMP [APP-287]** sets out measures to coordinate construction deliveries by HGVs to arrive and depart between 09:30 and 16:30 where possible, to avoid peak network hours of 08:00–09:00 and 17:00–18:00. It also includes a community liaison element to keep local communities informed about the construction process and to provide a contact for feedback should any issues arise. Compliance with the CTMP will be monitored by the Developer, Contractor and Wiltshire Council as local highway authority.

			The preparation, approval and implementation of the final CTMP, substantially in accordance with the outline CTMP, are secured through Requirement 15 of Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring construction traffic impacts are appropriately managed throughout the construction phase of the Scheme.
HPC-020	Transport and Access	Applicant's Prediction (Underestimated): The applicant's own data suggests a high number of truck movements, predicting 76 HGV movements per day south of Hullavington (one HGV every 9 minutes during an 11-hour shift).	The Applicant has predicted construction traffic flows for the Scheme based on a realistic breakdown of construction materials, such as aggregate and number of modules. Calculations are provided in Annex E of **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]**. Further detail of trip generation will also be added to **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]** and resubmitted at Deadline 1 of Examination. As explained in **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]**, trip generation of 76 HGVs on the route to Lime Down D is an estimate of the deliveries on a peak day, so does not represent a daily average. It is based on the worst-case assumptions, including but not limited to, all phases and Solar PV Sites being constructed simultaneously for the whole two-year construction period and a 50% uplift. The average number of HGV construction movements along the route to Lime Down D is only 50 per day/7 per hour/one every 8 minutes (less than the journey time along the route). Assuming a realistic construction programme as set out in Table 13.9 in **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]** where all parcels are not built out concurrently (and some parcels built out in less than 12 months), the average number of HGV construction movements along the route to Lime Down D is only 32 per day/5 per hour/one every 13 minutes (less than the journey time along the route).
HPC-021	Transport and Access	• Assessment of Actual Risk: Independent analysis indicates the developer's figures are over 40% too low. During peak periods, this equates to over 100 HGVs per day, or approximately one HGV every 6 minutes on average. This estimate	The Applicant has predicted construction traffic flows (trip generation) for the Scheme based on a realistic breakdown of construction materials, and the numbers and types of HGV's required to transport them. This is considered appropriate and accurate as it is based on the proposed bill of materials, including:

		does not even include traffic required for the cable connection through Area D.	• realistic aggregate volumes based on access track lengths and construction details; • number of proposed solar modules; • Number of mounting structures and associated footings; • Fencing and landscaping volumes; • Cabling; • Skid/Power Stations; and • Waste. Calculations are provided in Annex E of **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]**. Further detail of trip generation will also be added to **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]** and resubmitted at Deadline 1 of Examination. The following should also be noted: • trip generation of 76 HGVs on the route to Lime Down D is based on the worst-case assumptions, including but not limited to, all phases and Solar PV Sites being constructed simultaneously and a 50% uplift; • average number of HGV construction movements along the route to Lime Down D is only 50 per day/7 per hour/one every 8 minutes (less than the journey time along the route); - assuming a realistic construction programme, the average number of HGV construction movements along the route to Lime Down D is only 32 per day/5 per hour/one every 13 minutes (less than the journey time along the route); The Applicant notes that independent analysis of construction HGV trip generation has not been provided so is unable to comment on this at this stage.

HPC-022	Transport and Access	• Workers' vehicles: Along with the HGV traffic, this will be coincident with school drop off / pick up and normal commuting traffic.	An **oCTMP [APP-287]** supports the DCO Application and includes outline measures to minimise transport and access impacts as far as practicable. This includes a booking system to manage construction deliveries to avoid the requirement for HGVs generated by the Scheme passing each other in opposite directions on the local roads. and restricted hours of deliveries outside of peak hours. With these measures in place, the impact on driver delay caused by the temporary construction period would be negligible as shown in Table 13-27 in **ES Volume 1, Chapter 13-1: Transport and Access [APP-065]**. A final CTMP would be prepared post consent and must be substantially in accordance with the **oCTMP [APP-287]** and approved by the relevant local planning authorities (in consultation with the relevant highway authorities), as secured by Requirement 15 in Schedule 2 of the **Draft DCO [APP-016]**.
HPC-023	Transport and Access	3.2. Road Geometry Makes HGV Passing Unsafe No highway improvement works are proposed along this route, despite the road being critically narrow.	The assessment presented in Annex H of **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]** demonstrates adequate carriageway width or frequency of passing place opportunity to pass at least an HGV and a light vehicle as requested in comments provided by Wiltshire Council in its response (August 2025) to the Transport Assessment Scoping Note and confirmed in RR4934 Paragraph 4 of 'Appendix A - Highways and Transport Document Review - Detailed Comments'. This confirms that no passing bay or widening improvements are needed to accommodate these movements on the construction route outside of the Order Limits. The distances between passing points outside of the Order Limits are all within 150 m with forward visibility extending to the next passing point and beyond. This is within the generally accepted distance of 200 metres. An **oCTMP [APP-287]** supports the DCO Application and presents outline measures which restrict construction deliveries to the proposed construction routes. It also includes road condition surveys to ensure any damage to the highway network caused by construction traffic is identified and rectified, management of construction deliveries to avoid the requirement for HGVs generated by the Scheme passing each other in

			opposite directions on the local roads, and restricted hours of deliveries outside of peak hours. One specific measure provided for in the **oCTMP [APP-287]** is a booking system which will be set up to manage arrivals and departures to the Order Limits. This will be implemented in coordination with banksmen, which will be able to hold back any cross-over, should there be any delays on the roads. This will prevent HGVs generated by the Scheme passing each other in opposite directions on the local roads forming part of the construction routes (including this route) and will be confirmed as part of the final CTMP. With this mitigation in place, **ES Volume 1, Chapter 13-1: Transport and Access [APP-065]** concludes that impacts would be negligible to minor adverse. A final CTMP would be prepared post consent and must be substantially in accordance with the **oCTMP [APP-287]** and approved by the relevant local planning authorities (in consultation with the relevant highway authorities), as secured by Requirement 15 in Schedule 2 of the **Draft DCO [APP-016]**. To provide further comfort, additional information has been added to **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]** which will be submitted at Deadline 1 of Examination. This demonstrates that there is adequate carriageway width and/or passing place opportunity for two HGVs.
HPC-024	Transport and Access	• Safety Standard: We understand for two HGVs to pass safely; the road requires a minimum width of 5.5 meters. The route coincides with traffic for school from Wellington Place - a serious safety hazard for the children being brought to school	The assessment presented in Annex H of **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]** demonstrates adequate carriageway width or frequency of passing place opportunity to pass at least an HGV and a light vehicle as requested in comments provided by Wiltshire Council in its response (August 2025) to the Transport Assessment Scoping Note and confirmed in RR4934 Paragraph 4 of 'Appendix A - Highways and Transport Document Review - Detailed Comments'. This confirms that no passing bay or widening improvements are needed to accommodate these movements on the construction route outside of the Order Limits. The distances between passing points outside of the Order Limits

			are all within 150 m with forward visibility extending to the next passing point and beyond. This is within the generally accepted distance of 200 metres. The potential effects of construction traffic on highway safety and accident risk are assessed in **ES Volume 1, Chapter 13: Transport and Access [APP-065]**, which considers changes in traffic flows, HGV movements and accident risk on the local road network. Links experiencing traffic increases above defined assessment thresholds were taken forward for detailed analysis. Supporting technical evidence is provided in **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]**, which includes an assessment of baseline accident data and predicted changes in collision risk arising from construction traffic. The assessment concludes that the level of construction traffic associated with the Scheme is unlikely to materially affect road safety on links within the Study Area, and no significant adverse effects in relation to accident risk are anticipated. Mitigation measures to manage construction traffic safely are set out in the **Outline Construction Traffic Management Plan [APP-287]**, which includes defined vehicle routing, delivery scheduling and coordination with the local highway authority. The preparation, approval and implementation of the final CTMP, substantially in accordance with the outline CTMP, are secured through Requirement 15 of Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring construction traffic is managed safely (with accident risks minimised) throughout the construction phase of the Scheme.

HPC-025	Transport and Access	• Actual Measurements: A section of the route in the vicinity of Hullavington is measured at significantly less than this. Buses, farm traffic and school coaches have little hope of passing safely when there is so much HGV traffic or without a significant prospect of getting stuck at these points.	The assessment presented in Annex H of **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]** demonstrates adequate carriageway width or frequency of passing place opportunity to pass at least an HGV and a light vehicle as requested in comments provided by Wiltshire Council in its response (August 2025) to the Transport Assessment Scoping Note and confirmed in RR4934 Paragraph 4 of 'Appendix A - Highways and Transport Document Review - Detailed Comments'. This confirms that no passing bay or widening improvements are needed to accommodate these movements on the construction route outside of the Order Limits.The distances between passing points outside of the Order Limits are all within 150 m with forward visibility extending to the next passing point and beyond. This is within the generally accepted distance of 200 metres The potential effects of construction traffic on highway safety and accident risk are assessed in **ES Volume 1, Chapter 13: Transport and Access [APP-065]**, which considers changes in traffic flows, HGV movements and accident risk on the local road network. Links experiencing traffic increases above defined assessment thresholds were taken forward for detailed analysis. Supporting technical evidence is provided in **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]**, which includes an assessment of baseline accident data and predicted changes in collision risk arising from construction traffic. The assessment concludes that the level of construction traffic associated with the Scheme is unlikely to materially affect road safety on links within the Study Area, and no significant adverse effects in relation to accident risk are anticipated. Mitigation measures to manage construction traffic safely are set out in the **Outline Construction Traffic Management Plan [APP-287]**, which includes defined vehicle routing, delivery scheduling and coordination with the local highway authority. The preparation, approval and implementation of the final CTMP, substantially in accordance with the outline CTMP, are secured through Requirement 15 of Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring construction

			traffic is managed safely (with accident risks minimised) throughout the construction phase of the Scheme.
HPC-026	Transport and Access	• Physical Impossibility: This sustained lack of width means the road is unable to safely accommodate significant numbers of HGVs, creating unavoidable conflict, particularly on sections exacerbated by tight bends that restrict forward visibility. What steps will IGP take to ensure the local traffic is unimpeded by construction traffic?	The assessment presented in Annex H of **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]** demonstrates adequate carriageway width or frequency of passing place opportunity to pass at least an HGV and a light vehicle as requested in comments provided by Wiltshire Council in its response (August 2025) to the Transport Assessment Scoping Note and confirmed in RR4934 Paragraph 4 of 'Appendix A - Highways and Transport Document Review - Detailed Comments'. This confirms that no passing bay or widening improvements are needed to accommodate these movements on the construction route outside of the Order Limits.The distances between passing points outside of the Order Limits are all within 150 m with forward visibility extending to the next passing point and beyond. This is within the generally accepted distance of 200 metres. The potential effects of construction traffic on the local highway network are assessed in **ES Volume 1, Chapter 13: Transport and Access [APP-065]**, which considers construction vehicle movements, traffic volumes, road safety and effects on road users. This included the capacity of local roads and infrastructure to accommodate construction vehicles with consideration of construction traffic volumes, vehicle types, route suitability, and network performance.

			The assessment concludes that the level of construction traffic associated with the Scheme is unlikely to materially affect road safety on links within the Study Area, and no significant adverse effects on accident risk are anticipated. The assessment additionally concludes that with appropriate mitigation such as the Construction Traffic Management Plan in place to manage construction vehicle movements, there would be no significant adverse impacts on the local highway network during the construction, operation maintenance, and decommissioning phases of the Scheme. An **Outline Construction Traffic Management Plan (CTMP) [APP-287]** has been prepared and submitted with the DCO application. The aim of the CTMP is to ensure that the effect of the construction phase on the local highway network is minimised. The **Outline CTMP [APP-287]** secures measures to coordinate construction deliveries by HGVs to arrive and depart between 09:30 and 16:30 where possible, to avoid peak network hours of 08:00–09:00 and 17:00–18:00. It also includes a community liaison element to keep local communities informed about the construction process and to provide a contact for feedback should any issues arise. Compliance with the CTMP will be monitored by the Developer, Contractor and Wiltshire Council as local highway authority. The preparation, approval and implementation of the final CTMP, substantially in accordance with the outline CTMP, are secured through Requirement 15 of Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring construction traffic impacts are appropriately managed throughout the construction phase of the Scheme.

HPC-027	Transport and Access	3.3. Severe Risk to Vulnerable Highway Users Directly Impacting Hullavington The high volume of HGV traffic is in direct conflict with the essential local and leisure use of the road network by Hullavington's residents, a conflict the applicant has failed to adequately assess. This issue is particularly acute for Hullavington because the road serves as a primary route for local active travel.	**ES Volume 1, Appendix 13-1: Transport Assessment [APP-065]** at 13.10.42 assesses the impact on non-motorised user (NMU) delay and amenity, including fear and intimidation on links Road East of Hullavington (ref 11) and Bradfield Cottages (ref 12) <u>NMU Delay</u> NMU delay is considered negligible given there is no existing pedestrian or cycle infrastructure on the construction routes and likely low numbers of existing NMU users. It is anticipated that public rights of way (PRoW) which cross the Order Limits will generally remain open during the construction phase of the Scheme. There may be some slight perceptible delay to NMU movement if a construction vehicle is crossing a PRoW within the Order Limits. An **Outline PRoW and Permissive Path Management Plan [APP-282]** forms an embedded mitigation and will provide measures to ensure the effects of the construction phase on PRoW users is minimised. The **Outline PRoW and Permissive Path Management Plan [APP-282]** contain specific measures for the temporary diversion of footpath WT|GRIT|20 and bridleway WT|MALW|54, where access to Cable Route Corridor works east of Grittleton, and HGV access to Lime Down E are taken respectively. These diversions are proposed to ensure unreasonable effects to PROW users are not experienced during construction, replacement and decommissioning. <u>NMU Amenity</u> Pedestrian amenity is broadly defined as the relative pleasantness of a journey, and is considered to be affected by traffic flow, traffic composition and pavement width/separation from traffic see IEMA guidelines; Environmental Assessment of Traffic and Movement , para 3.29 . The construction routes on Road East of Hullavington (ref 11) and Bradfield Cottages (ref 12) has noexisting pedestrian infrastructure and no footways, making them already unattractive as walking routes with no pedestrian amenity.

			Fear and intimidation for other NMU's can be assessed. Highway widths of construction routes have been assessed in **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233**] and provide sufficient width for HGV traffic to comfortably pass cyclists. **ES Volume 1, Appendix 13-1: Transport Assessment [APP-065]** concludes that the level of flow change will not result in a step change in fear and intimidation as defined in the **IEMA guidance at Tables 3.1, 3.2** and **3.3**. **ES Volume 1, Appendix 13-1: Transport Assessment [APP-065]** concludes that on all links in the Study Area including Road East of Hullavington (ref 11) and Bradfield Cottages (ref 12) ,the significance of effect is Minor Adverse (temporary). <u>Mitigation</u> An **OCTMP [APP-287]** supports the DCO application and presents outline measures which restrict construction deliveries to the proposed construction routes and separates the public and recreational users from hazards, including, traffic management measures such as signage and banksmen to improve road safety, fencing , and dust and noise control to ensure public highway is free of debris and reduce any likely disruption . The final CTMP the measures summarised above are secured as a requirement of the DCO
HPC-028	Transport and Access	• Lack of safe places for active travel: Since there are no footways and limited verges along this section of road, vulnerable users are required to share the narrow carriageway directly with the continuous stream of construction vehicles.	**ES Volume 1, Appendix 13-1: Transport Assessment [APP-065]** at 13.10.42 assesses the impact on non-motorised user (NMU) delay and amenity, including fear and intimidation on links Road East of Hullavington (ref 11) and Bradfield Cottages (ref 12) <u>NMU Delay</u> NMU delay is considered negligible given there is no existing pedestrian or cycle infrastructure on the construction routes and likely low numbers of existing NMU users. It is anticipated that public rights of way (PRoW) which cross the Order Limits will generally remain open during the construction

			phase of the Scheme. There may be some slight perceptible delay to NMU movement if a construction vehicle is crossing a PRoW within the Order Limits. An **Outline PRoW and Permissive Path Management Plan [APP-282]** forms an embedded mitigation and will provide measures to ensure the effects of the construction phase on PRoW users is minimised. The **Outline PRoW and Permissive Path Management Plan [APP-282]** contain specific measures for the temporary diversion of footpath WT|GRIT|20 and bridleway WT|MALW|54, where access to Cable Route Corridor works east of Grittleton, and HGV access to Lime Down E are taken respectively. These diversions are proposed to ensure unreasonable effects to PROW users are not experienced during construction, replacement and decommissioning. <u>NMU Amenity</u> Pedestrian amenity is broadly defined as the relative pleasantness of a journey, and is considered to be affected by traffic flow, traffic composition and pavement width/separation from traffic see IEMA guidelines; Environmental Assessment of Traffic and Movement, para 3.29 . The construction routes on Road East of Hullavington (ref 11) and Bradfield Cottages (ref 12) has no existing pedestrian infrastructure and no footways, making them already unattractive as walking routes with no pedestrian amenity. Fear and intimidation for other NMU's can be assessed. Highway widths of construction routes have been assessed in **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233**] and provide sufficient width for HGV traffic to comfortably pass cyclists. **ES Volume 1, Appendix 13-1: Transport Assessment [APP-065]** concludes that the level of flow change will not result in a step change in fear and intimidation as defined in the **IEMA guidance at Tables 3.1, 3.2** and **3.3**. **ES Volume 1, Appendix 13-1: Transport Assessment [APP-065]** concludes that on all links in the Study Area including Road

			East of Hullavington (ref 11) and Bradfield Cottages (ref 12) ,the significance of effect is Minor Adverse (temporary). <u>Mitigation</u> An **OCTMP [APP-287]** supports the DCO application and presents outline measures which restrict construction deliveries to the proposed construction routes and separates the public and recreational users from hazards, including, traffic management measures such as signage and banksmen to improve road safety, fencing , and dust and noise control to ensure public highway is free of debris and reduce any likely disruption . The final CTMP the measures summarised above are secured as a requirement of the DCO

HPC-029	Transport and Access	• Active Travel Conflict: o Cycling: The road connects with the Wiltshire Cycleway (Section 14) and an important route option (via Norton and Foxley) that cyclists use to avoid the hazardous A429. Large HGVs present a very real risk due to the narrowness and blind bends, making overtaking extremely dangerous. This is the route that cyclists take to get safely into Malmesbury. Residents of Hullavington walking to The Tap on this road must walk in the road. The Tap is the ONLY venue for hot meals and coffees for Hullavington residents.	**ES Volume 1, Appendix 13-1: Transport Assessment [APP-065]** at 13.10.42 assesses the impact on non-motorised user (NMU) delay and amenity, including fear and intimidation on links Road East of Hullavington (ref 11) and Bradfield Cottages (ref 12) <u>NMU Delay</u> NMU delay is considered negligible given there is no existing pedestrian or cycle infrastructure on the construction routes and likely low numbers of existing NMU users. It is anticipated that public rights of way (PRoW) which cross the Order Limits will generally remain open during the construction phase of the Scheme. There may be some slight perceptible delay to NMU movement if a construction vehicle is crossing a PRoW within the Order Limits. An **Outline PRoW and Permissive Path Management Plan [APP-282]** forms an embedded mitigation and will provide measures to ensure the effects of the construction phase on PRoW users is minimised. The **Outline PRoW and Permissive Path Management Plan [APP-282]** contain specific measures for the temporary diversion of footpath WT|GRIT|20 and bridleway WT|MALW|54, where access to Cable Route Corridor works east of Grittleton, and HGV access to Lime Down E are taken respectively. These diversions are proposed to ensure unreasonable effects to PROW users are not experienced during construction, replacement and decommissioning. <u>NMU Amenity</u> Pedestrian amenity is broadly defined as the relative pleasantness of a journey, and is considered to be affected by traffic flow, traffic composition and pavement width/separation from traffic see IEMA guidelines; Environmental Assessment of Traffic and Movement , para 3.29 . The construction routes on Road East of Hullavington (ref 11) and Bradfield Cottages (ref 12) has noexisting pedestrian infrastructure and no footways, making them already unattractive as walking routes with no pedestrian amenity.

			Fear and intimidation for other NMU's can be assessed. Highway widths of construction routes have been assessed in **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233**] and provide sufficient width for HGV traffic to comfortably pass cyclists. **ES Volume 1, Appendix 13-1: Transport Assessment [APP-065]** concludes that the level of flow change will not result in a step change in fear and intimidation as defined in the **IEMA guidance at Tables 3.1, 3.2** and **3.3**. **ES Volume 1, Appendix 13-1: Transport Assessment [APP-065]** concludes that on all links in the Study Area including Road East of Hullavington (ref 11) and Bradfield Cottages (ref 12) ,the significance of effect is Minor Adverse (temporary). <u>Mitigation</u> An **OCTMP [APP-287]** supports the DCO application and presents outline measures which restrict construction deliveries to the proposed construction routes and separates the public and recreational users from hazards, including, traffic management measures such as signage and banksmen to improve road safety, fencing , and dust and noise control to ensure public highway is free of debris and reduce any likely disruption.The final CTMP the measures summarised above are secured as a requirement of the DCO.
HPC-030	Transport and Access	o Walking & Rights of Way: There are six public rights of way joining the unnamed road near Hullavington. Furthermore, recommended local walks include sections along this road, meaning the high numbers of HGVs will put vulnerable users at high risk. Dog	The Applicant confirms that existing PRoW are to be controlled within the Scheme design, with management measures set out in the **Outline Public Rights of Way and Permissive Paths Management Plan (PROWPPMP) [APP-282]**, confirmed as embedded mitigation in Section 16.9 of **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]**.

		walkers have to cross into the track designated for the HGV access point. It is inconceivable that this will be safe.	There are instances where the proposed internal access tracks cross PRoW within the Order Limits. In these instances, public access to the PRoW will be retained where practicable. However, the PRoW will be managed throughout the construction period, to ensure the safety of all users. PRoW management strategies set out in the **Outline Public Rights of Way and Permissive Paths Management Plan (PRoW and Permissive Paths MP) [EN010168/APP/7.17]**.
HPC-031	Transport and Access	• Amenity Impact (Fear and Intimidation): The high frequency of HGV movements (one every six minutes) will cause a significant adverse impact for vulnerable users. People will be deterred from undertaking these important local walks and cycle routes, and their enjoyment will be severely reduced by the fear and intimidation caused by industrial traffic. To understand the impact on residents more fully, refer to our local walks: walks 1,2,3,4,6,7, 8 and 9 are all severely impacted by this proposed project.	**ES Volume 1, Appendix 13-1: Transport Assessment [APP-065]** at 13.10.42 assesses the impact on non-motorised user (NMU) delay and amenity, including fear and intimidation on links Road East of Hullavington (ref 11) and Bradfield Cottages (ref 12) <u>NMU Delay</u> NMU delay is considered negligible given there is no existing pedestrian or cycle infrastructure on the construction routes and likely low numbers of existing NMU users. It is anticipated that public rights of way (PRoW) which cross the Order Limits will generally remain open during the construction phase of the Scheme. There may be some slight perceptible delay to NMU movement if a construction vehicle is crossing a PRoW within the Order Limits. An **Outline PRoW and Permissive Path Management Plan [APP-282]** forms an embedded mitigation and will provide measures to ensure the effects of the construction phase on PRoW users is minimised. The **Outline PRoW and Permissive Path Management Plan [APP-282]** contain specific measures for the temporary diversion of footpath WT|GRIT|20 and bridleway WT|MALW|54, where access to Cable Route Corridor works east of Grittleton, and HGV access to Lime Down E are taken respectively. These diversions are proposed to ensure unreasonable effects to PROW users are not experienced during construction, replacement and decommissioning. <u>NMU Amenity</u>

			Pedestrian amenity is broadly defined as the relative pleasantness of a journey, and is considered to be affected by traffic flow, traffic composition and pavement width/separation from traffic see IEMA guidelines; Environmental Assessment of Traffic and Movement , para 3.29 . The construction routes on Road East of Hullavington (ref 11) and Bradfield Cottages (ref 12) has noexisting pedestrian infrastructure and no footways, making them already unattractive as walking routes with no pedestrian amenity. Fear and intimidation for other NMU's can be assessed. Highway widths of construction routes have been assessed in **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233**] and provide sufficient width for HGV traffic to comfortably pass cyclists. **ES Volume 1, Appendix 13-1: Transport Assessment [APP-065]** concludes that the level of flow change will not result in a step change in fear and intimidation as defined in the **IEMA guidance at Tables 3.1, 3.2** and **3.3**. **ES Volume 1, Appendix 13-1: Transport Assessment [APP-065]** concludes that on all links in the Study Area including Road East of Hullavington (ref 11) and Bradfield Cottages (ref 12) ,the significance of effect is Minor Adverse (temporary). <u>Mitigation</u> An **OCTMP [APP-287]** supports the DCO application and presents outline measures which restrict construction deliveries to the proposed construction routes and separates the public and recreational users from hazards, including, traffic management measures such as signage and banksmen to improve road safety, fencing , and dust and noise control to ensure public highway is free of debris and reduce any likely disruption . The final CTMP the measures summarised above are secured as a requirement of the DCO

HPC-032	Noise and Vibration	To understand the noise impact, listen to the recording here made a few years ago by a resident. This walk is 6 on the list. An audio version of one of the walks around Hullavington here Surrendell House road walk.wav This includes sounds of the Gauze Brook, one of the inverters on Hill Hays Lane (as an indicator of the nature of the noise these things make only. This one is a 2MW version recorded early on a March day so far from full power. There will be 92 4MW examples of these in the BESS site) and a train going past Happylands Bridge only a hundred meters or so from the BESS site. The train makes about 90dB; there are 159 90dB equipment across the solar panel sites plus far more in the BESS. The difference is the train goes away, the inverters stay on.	While it is true that the plant has sound power levels around 90 dB, as presented in Table 5 of **ES Volume 3, Appendix 14-4: Noise Modelling [APP-237]**, this is not a level that would ever be experienced either on a PRoW or in a house or garden. A sound power level of 90 dB for a static piece of plant drops to around 56 dB at 20m, the level of regular conversation, and around 35 dB at 300m, quieter than many household appliances.
HPC-033	Transport and Access	What mitigation and safety measures will IGP take to ensure the safety of road users sufficient to ensure that no injury or death can result from the Lime Down solar park construction and operation?	The potential effects of construction traffic on highway safety and accident risk are assessed in **ES Volume 1, Chapter 13: Transport and Access [APP-065]**, which considers changes in traffic flows, HGV movements and accident risk on the local road network. Links experiencing traffic increases above defined assessment thresholds were taken forward for detailed analysis. Supporting technical evidence is provided in **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]**, which includes an assessment of baseline accident data and predicted changes in collision risk arising from construction traffic. The assessment concludes that the level of construction traffic associated with the Scheme is unlikely to materially affect road safety on links within the Study Area, and no significant adverse effects on accident risk are anticipated. Mitigation measures to manage construction traffic safely are set out in the **Outline Construction Traffic Management Plan**

			[APP-287], which includes defined vehicle routing, delivery scheduling and coordination with the local highway authority. The preparation, approval and implementation of the final CTMP, substantially in accordance with the outline CTMP, are secured through Requirement 15 of Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring construction traffic is managed safely throughout the construction phase of the Scheme.
HPC-034	Transport and Access	What steps will IGP take to ensure active travel is not avoided by residents in fear of safety issues?	**ES Volume 1, Appendix 13-1: Transport Assessment [APP-065]** at 13.10.42 assess the impact on non-motorised user delay and amenity, including Fear and Intimidation. <u>NMU Delay</u> NMU delay is considered negligible given there is no existing pedestrian or cycle infrastructure on the construction routes and likely low numbers of existing NMU users. It is anticipated that PRoW which cross the Order Limits will generally remain open during the construction phase of the Scheme. There may be some slight perceptible delay to NMU movement if a construction vehicle is crossing a PRoW within the Order Limits. An **Outline PRoW and Permissive Path Management Plan [APP-282]** forms an embedded mitigation and will provide measures to ensure the effects of the construction phase on PRoW users is minimised. The **Outline PRoW and Permissive Path Management Plan [APP-282]** contain specific measures for the temporary diversion of footpath WT|GRIT|20 and bridleway WT|MALW|54, where access to Cable Route Corridor works east of Grittleton, and HGV access to Lime Down E are taken respectively. These diversions are proposed to ensure unreasonable effects to PROW users are not experienced during construction, replacement and decommissioning. <u>NMU Amenity</u>

			Pedestrian amenity is broadly defined as the relative pleasantness of a journey, and is considered to be affected by traffic flow, traffic composition and pavement width/separation from traffic. The construction routes on the road network have little existing pedestrian infrastructure and no footways, making them already unattractive as walking routes with no pedestrian amenity so this cannot be assessed. Fear and Intimidation for other NMU's can be assessed. Highway widths of construction routes have been assessed **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233**] and provide sufficient width for HGV traffic to comfortably pass cyclists. **ES Volume 1, Appendix 13-1: Transport Assessment [APP-065]** concludes that the level of flow change will not result in a step change in fear and intimidation as defined in the **IEMA guidance at tables 3.1, 3.2** and **3.3**. **ES Volume 1, Appendix 13-1: Transport Assessment [APP-065]** concludes that on all links in the study area the significance of effect is Minor Adverse (temporary). <u>Mitigation</u> An **OCTMP [APP-287]** supports the DCO Application and presents outline measures which restrict construction deliveries to the proposed construction routes and separates the public and recreational users from hazards, including, traffic management measures such as signage and banksmen, fencing, and dust and noise control.
HPC-035	Decommissioning and Construction	3.4. Flawed Environmental Statement Assessment IGP's failure to identify significant adverse transport environmental effects is due to a failure to assess the use of the highway by vulnerable users and a systematic underestimation of HGV trip generation. This is still an omission despite these problems being raised in earlier consultation stages	See response to Paragraph **ES Volume 1, Appendix 13-1: Transport Assessment [APP-065]** at 13.10.42 assesses the impact on non-motorised user (NMU) delay and amenity, including fear and intimidation on links Road East of Hullavington (ref 11) and Bradfield Cottages (ref 12). <u>NMU Delay</u>

			NMU delay is considered negligible given there is no existing pedestrian or cycle infrastructure on the construction routes and likely low numbers of existing NMU users. It is anticipated that public rights of way (PRoW) which cross the Order Limits will generally remain open during the construction phase of the Scheme. There may be some slight perceptible delay to NMU movement if a construction vehicle is crossing a PRoW within the Order Limits. An **Outline PRoW and Permissive Path Management Plan [APP-282]** forms an embedded mitigation and will provide measures to ensure the effects of the construction phase on PRoW users is minimised. The **Outline PRoW and Permissive Path Management Plan [APP-282]** contain specific measures for the temporary diversion of footpath WT|GRIT|20 and bridleway WT|MALW|54, where access to Cable Route Corridor works east of Grittleton, and HGV access to Lime Down E are taken respectively. These diversions are proposed to ensure unreasonable effects to PROW users are not experienced during construction, replacement and decommissioning. <u>NMU Amenity</u> Pedestrian amenity is broadly defined as the relative pleasantness of a journey, and is considered to be affected by traffic flow, traffic composition and pavement width/separation from traffic see IEMA guidelines; Environmental Assessment of Traffic and Movement, para 3.29. The construction routes on Road East of Hullavington (ref 11) and Bradfield Cottages (ref 12) has no existing pedestrian infrastructure and no footways, making them already unattractive as walking routes with no pedestrian amenity. Fear and intimidation for other NMU's can be assessed. Highway widths of construction routes have been assessed in **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]** and provide sufficient width for HGV traffic to comfortably pass cyclists.

			ES Volume 1, Appendix 13-1: Transport Assessment [APP-065] concludes that the level of flow change will not result in a step change in fear and intimidation as defined in the **IEMA guidance at Tables 3.1, 3.2** and **3.3**. **ES Volume 1, Appendix 13-1: Transport Assessment [APP-065]** concludes that on all links in the Study Area including Road East of Hullavington (ref 11) and Bradfield Cottages (ref 12), the significance of effect is Minor Adverse (temporary). **Mitigation** An **OCTMP [APP-287]** supports the DCO application and presents outline measures which restrict construction deliveries to the proposed construction routes and separates the public and recreational users from hazards, including, traffic management measures such as signage and banksmen to improve road safety, fencing , and dust and noise control to ensure public highway is free of debris and reduce any likely disruption . The final CTMP the measures summarised above are secured as a requirement of the DCO
HPC-036	Socio-Economics, Tourism and Recreation	Erosion of Community and Landscape Beyond the immediate visual and safety issues, the project is predicted to lead to a broader erosion of rural life for Hullavington residents and those residents in our wider parish.	The Applicant notes this comment. A detailed assessment of the likely significance of effects from the Scheme on the use and desirability of individual PRoW and recreational access to the countryside is included in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** and **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]**. This assessment considers the impact on individual recreational routes, including their practical use, enjoyment and desirability. The Applicant confirms that the majority of significant adverse effects can be mitigated. However, some significant adverse effects to users of PRoW and unsurfaced roads in Lime Down E during construction cannot be mitigated further. No significant residual effects are anticipated during the operational phase of the Scheme. The assessment in **ES Volume 1, Chapter 18: Human Health [APP-070]** also considers the physical and mental health impacts

			of changes to recreation and countryside access under the assessment topic 'open space, leisure and play', and concludes that no significant adverse effects are anticipated at any phase of the Scheme. The Applicant confirms that existing PRoW are to be controlled within the Scheme design, with management measures set out in the **Outline Public Rights of Way and Permissive Paths Management Plan (PROWPPMP) [APP-282]**, confirmed as embedded mitigation in Section 16.9 of ES Chapter 16. New permissive access routes have been incorporated into the Scheme design, shown as Work No. 10 on the **Works Plan [APP-007]** and illustrated on **ES Volume 2, Figure 3-4: Landscape and Ecology Mitigation Plan [APP-084]**. These are identified as additional mitigation and enhancement measures in Section 16.11 of ES Chapter 16. The PRoW and Permissive Paths Management Plan is secured through Requirement 16 of Schedule 2 of the **Draft Development Consent Order [APP-016]**. The preparation, approval and implementation of the detailed Construction Environmental Management Plan and Construction Traffic Management Plan, substantially in accordance with the outline plans, are secured through Requirements 13 and 15 respectively in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that impacts on PRoW and recreational routes are appropriately managed during construction. The approach to recreation and access has been discussed with Wiltshire Council's Public Health team and is under discussion with Wiltshire Council's Countryside Access Team and is set out in the relevant Statement of Common Ground to be submitted at Deadline 1. With reference to visual issues, the visual effects of the Scheme have been robustly assessed in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**. Significant visual effects are recorded in **Appendix 8-3-2-2 Landscape and Visual Assessment Sheets (Significant) [APP191]** and the visual effects of the Scheme are summarised in ES Volume 3, Appendix

			8-3-3 .**[APP-192].** Temporary Major/Moderate and Moderate Adverse effects on visual receptors have been recorded across the Scheme during construction and at Year 1. However, for the majority of these receptors, the effects reduce to non –significant levels as a result of the embedded mitigation measures which are set out in Section 8.9 of **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]** and include landscape buffers, retention of existing hedgerows and woodland, and new planting to provide screening and integration over time. The assessment also identifies that there would be some long term significant effects on the visual amenity of users of some localised footpaths, as a result of the Scheme. This predominantly relates to locations where footpaths diagonally cross fields and mitigation planting would be inappropriate to landscape character and the legacy landscape. Those receptors which would experience significant long term visual effects are listed in Table 8-30 of the LVIA **[APP-060]**

HPC-037	Socio-Economics, Tourism and Recreation	Economic Damage to Local Tourism The destruction of the quiet lane network and tranquil rural environment will severely impact local businesses that rely on visitors utilizing the area for walking, cycling, and other tourism activities. Prolonged Construction Disruption The community faces the prospect of "*major and prolonged disruption*" for several years. This includes significant HGV movements, necessary road widening, and continuous noise and dust associated with the construction phase.	Further detail on the impact to walking and cycling is provided in the Applicant's response above. The Applicant has assessed that there is a likely worst-case temporary loss of 50 FTE tourism industry jobs as a result of the Scheme, as set out in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068**]. Where losses to tourism have been identified, these are worst-case estimates based on likely significant effects from the Scheme including increased HGV use of the local highway network and impacts on the use of PROWs for walking, wheeling, cycling and riding. This estimate does not account for additional mitigation measures being applied. This effect on GVA in tourism-dependent industries is not significant, accounting for less than 0.7% of tourism-based employment within 5 km of the Scheme (BRES, 2023 data), and approximately 0.17% of tourism employment across Wiltshire (29,000 estimate from Visit Wiltshire, 2021). This is also a temporary effect, anticipated to occur during construction, with recovery to tourism businesses anticipated to begin as soon as construction works are complete. During the Scheme's operational phase, the reduction in tourism compared to current conditions is anticipated to be equivalent to a loss of 11 FTE tourism-dependent jobs. Additional mitigation measures through the **OSSCEP [APP-285]** seek to reduce these losses through focusing on local recruitment, promoting local suppliers where practicable, and through providing retraining opportunities for workers in tourism-dependent industries. It is considered that these measures would help to reduce local losses in the local economy and help to generate additional GVA in the local economy in alternative industries. The OSSCEP is secured by Requirement 18 in Schedule 2 to the **Draft DCO [APP-016].**
HPC-038	Ecology and Biodiversity	Conflict with Landscape Permeability and Wildlife Impact The requirement for extensive, high-security perimeter fencing fundamentally conflicts with the existing character of the rural landscape.	The Applicant notes this comment. Please see the Applicants responses below which respond to the specific issues raised regarding high-security perimeter fencing.

HPC-039	Ecology and Biodiversity	• Impermeable Barrier: The current field boundaries consist predominantly of traditional drystone walling and mature hedges, creating a highly permeable environment for wildlife with very few high fences. The proposed solar arrays and infrastructure, however, necessitate extensive, imposing security fencing (often 2-2.5 meters high) to secure the site. • Restriction on Wildlife: This large-scale fencing creates an impermeable barrier that restricts the natural migratory and foraging routes of local wildlife, including deer, badgers, and small mammals. The landscape becomes fragmented and caged, hindering the ability of animals to move freely between habitats and funnelling them along dangerous highways.	Potential effects of boundary treatments and fencing on ecology and wildlife movement are assessed in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**, which considers impacts on habitats and species during construction, operation and decommissioning and identifies measures to avoid or mitigate barriers to wildlife movement. The assessment identifies embedded and additional mitigation measures and concludes that, with these measures in place, no unacceptable significant adverse effects on ecology and biodiversity are anticipated. The Scheme design incorporates fencing around the Solar PV Sites that is permeable to wildlife, with the exception of deer. This means animals (excluding deer only) will be able to freely access habitats within the Solar PV Sites without the need for wildlife gates. In addition, wide buffers are retained around the peripheries of the Solar PV Sites to allow wildlife, including deer, to move between favoured habitats. These measures are described in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]** and detailed in the **Outline Ecological Protection and Mitigation Strategy (OEPMS) [APP-284]**. Fencing will be subject to regular inspection and maintenance to ensure continued permeability to wildlife and effective functioning over the lifetime of the Scheme. Measures for ongoing ecological management and maintenance are set out in the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]**. The preparation, approval and implementation of the detailed Ecological Protection and Mitigation Strategy and Landscape and Ecological Management Plan, substantially in accordance with the **EPMS [APP-284]** and **OLEMP [APP-283]**, are secured through Requirements 8 and 7 respectively in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that fencing design and maintenance measures are delivered and maintained throughout the lifetime of the Scheme.

HPC-040	Ecology and Biodiversity	• Breach of Landscape Strategy: The construction of such widespread barriers flies directly in the face of local, regional, and national commitments to Landscape Recovery strategies. These strategies are designed to enhance ecological connectivity and support nature's recovery on a large scale; the industrial fencing actively prevents this objective.	The Scheme design incorporates fencing around the Solar PV Sites that is permeable to wildlife, with the exception of deer. This means animals (excluding deer only) will be able to freely access habitats within the Solar PV Sites without the need for wildlife gates. In addition, wide buffers are retained around the peripheries of the Solar PV Sites to allow wildlife, including deer, to move between favoured habitats. These measures are described in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]** and detailed in the **Outline Ecological Protection and Mitigation Strategy (OEPMS) [APP-284]**. The Scheme will create and enhance a range of habitats, such as grasslands, hedgerows and ponds, that will benefit a wide range of wildlife present in the area as well as strengthen connective links to habitats within the Scheme and in the wider landscape, which is entirely consistent with the principles of Local Nature Recovery Strategies. A comprehensive package of habitat creation and enhancement measures are shown in **ES Volume 2, Figure 3-4: Landscape and Ecological Mitigation Plan [APP-084]** and detailed in the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]**.
HPC-041	Ecology and Biodiversity	What steps will IGP take to ensure wildlife will not be restricted from their current habitat?	Measures designed to ensure wildlife can continue to use habitats within the Scheme throughout both the construction phase and operation and maintenance phase are detailed within the O**EPMS [APP-284]** and **OLEMP [APP-283]** respectively. These include the safeguarding of key habitat features and buffer zones throughout construction, as well as measures designed to ensure all retained habitats remain suitable for protected / notable wildlife species for the lifespan of the Scheme, including a comprehensive package of ecological monitoring.

HPC-042	Ecology and Biodiversity	What steps will IGP take to ensure they have fully taken into account the Landscape Recovery Strategy and that any steps are totally relevant to the local environment?	The draft Wiltshire Local Nature Recovery Strategy (LNRS) was consulted during the design on the habitat creation and enhancement measures shown in **ES Volume 2, Figure 3-4: Landscape and Ecological Mitigation Plan [APP-084]** and detailed in the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]**. It is acknowledged that the full LNRS has been published in October 2025 subsequent to the preparation of these documents, although it is noted that the published LNRS does not considerably differ from the draft version and no changes to the measures set out within the **Landscape and Ecological Mitigation Plan [APP-084]** or the **OLEMP [APP-285]** are considered necessary as a result of the final LNRS having been published. The detailed Landscape and Ecological Management Plan, which willl need to be substantially in accordance with the **OLEMP [APP-283]** secured through Requirement 7 in Schedule 2 of the **Draft Development Consent Order [APP-016]**, will consult the published and most-up-to LNRS during its preparation.
HPC-043	Description and DCO Process	Conclusion The objections raised by the Hullavington community are comprehensive and centre on irreversible environmental damage, inappropriate industrial scale, and unacceptable public safety risks, particularly concerning the BESS and substation locations and construction accesses. These concerns underscore the parish's firm opposition to the current proposal, asserting that it would permanently destroy its rural character and quality of life.	The Applicant notes this comment. Please see the Applicant's responses above which respond to the specific issues raised throughout the representation made by Hullavington Parish Council.

5.14 Norton and Foxley Parish

Table 5-14 RR-3559

Reference	Theme	Comments/Issues Raised	Applicant's Response
NFP-001	Description and DCO Process	Relevant Representation - Norton and Foxley Parish For the reasons summarised below, Norton and Foxley Parish is firmly opposed to Lime Down Solar Park (LDSP).	The Applicant notes Norton and Foxley Parish's response and has responded in full below.
NFP-002	Landscape and Visual	Landscape and Visual LDSP would be to the south and readily visible from both villages. Currently, the views in that direction are idyllic and typically 'Cotswold' - unspoilt and far-reaching. Low hedges and occasional trees mark the field boundaries and the principal land use is arable/pastoral farming.	The visual effects of the Scheme on the villages of Norton (Receptor RS008) and Foxley (receptor RS007) have been assessed in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060].** These receptors are assessed in Appendix 8-3-1: Visual Assessment Sheets (Not carried through to the **ES Assessment) [APP189]**. No significant effects were recorded due to the distance to infrastructure from the receptors.
NFP-003	Landscape and Visual	If approved, LDSP would blight the landscape. We would be confronted by a vast panorama of 4.5m high black plastic solar panels; 7.0m high 132kV substations and a 13m high 400kV substation. Any attempt to hide these 'eyesores' with high hedges would be out of keeping. The adverse impact of LDSP on the landscape must be evaluated.	**ES Volume 1, Chapter 8: Landscape and Visual [APP-060]** robustly assesses both the landscape and visual effects of the Scheme independently to ensure both the impacts and effects on the fabric and character of the landscape are taken into account as well as the views and visibility. The **LVIA [APP-060]** recognises that there would be temporary Moderate Adverse effects on Landscape Character within the 1 km as a result of the change in land use from arable farmland to solar infrastructure. However, the Scheme proposes significant mitigation measures informed by Wiltshire's Nature Recovery Strategy to reduce the effects of the Scheme on landscape character which will provide significant beneficial effects to the fabric of the Sites and the legacy Landscape. In visual terms, the LVIA **[APP-060]** assesses effects on identified visual receptors, including residential properties, users of public rights of way and roads. The assessment identifies that there would be some significant effects on the visual amenity of users of some localised footpaths, as a result of the Scheme. This predominantly relates to locations where footpaths

Reference	Theme	Comments/Issues Raised	Applicant's Response
			diagonally cross fields and mitigation planting would be inappropriate to landscape character and the legacy landscape. The scale of development within the Order Limits has been significantly reduced from the layout assessed in the Preliminary Environmental Information Report (PEIR) through an iterative design process undertaken in response to consultation and in accordance with the mitigation hierarchy to avoid, reduce and mitigate adverse effects. As part of this design evolution, panels along the edge of the Cotswolds National Landscape and along the Fosse Way have been removed. Mitigation measures to address landscape and visual effects have been informed by Wiltshire's Nature Recovery Strategy and are set out in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**, **Figure 3-4-1 to 3-4-5.2 Landscape and Ecology Mitigation Plan [APP-084]** and detailed within the **Outline Landscape and Ecological Mitigation Plan (LEMP) [APP-283]** and the **Outline Ecological Protection and Mitigation Strategy (EPMS) [APP-284]**. These documents include proposals for new and enhanced planting, retention of existing hedgerows and woodland, and landscape integration measures to reduce visual effects over time. In addition, the Scheme design incorporates minimum offsets from existing landscape features, including residential properties, ancient woodland, woodland, hedgerows, public rights of way and watercourses, to further limit visual impacts. The preparation, approval and implementation of detailed landscape and ecological management plans, substantially in accordance with the **OLEMP [APP-283]** and **EPMS [APP-284]**, are secured through requirements in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that the

Reference	Theme	Comments/Issues Raised	Applicant's Response
			identified mitigation measures are delivered and maintained throughout the lifetime of the Scheme.
NFP-004	Hydrology, Flood Risk and Drainage	Flooding All of the roads serving Norton and Foxley are susceptible to serious flooding and the hydrology of the area is quick to respond. Within a few hours of heavy rainfall the roads become impassable as was the case with Storm Claudia this November. Three or four times a year either one or both villages are cut off from the rest of the county and this can last for days. Properties are inundated and abandoned cars block the roads, preventing access to the vulnerable and for emergency vehicles. There is a fear that the introduction of large solar panels and concrete bases will accelerate the flow of water and, therefore, increase the intensity and frequency of flooding events, also during construction when the soils become compacted.	An assessment of the effects of the Scheme on flood risk both within the Site and the surrounding area is provided in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [APP-063]**, with supporting information provided in **ES Volume 3, Appendix 11-1 to 11-9: Flood Risk Assessment and Drainage Strategy [APP-210 to APP-218].** The assessment concludes that, with the embedded mitigation measures secured, the Scheme would not result in a material increase in off-site flood risk, including to adjacent communities and downstream receptors, and that any on-site flood risk would be managed such that the Scheme remains safe and operable for its lifetime. The assessment has been prepared in accordance with national policy and best practice guidance and in consultation with the Environment Agency and Lead Local Flood Authority and is set out in the relevant Statement of Common Ground to be submitted at Deadline 1. The **Outline Construction Environmental Management Plan (CEMP) [APP-277]** has been developed to control construction-phase risks and ensure there is no material increase in off-site flood risk. In accordance with NPS EN-3 (paragraph 2.10.84), the assessment differentiates between solar PV panel areas, which drain to the existing ground and therefore do not generally give rise to significant drainage effects, and associated infrastructure (for example access tracks, temporary construction compounds, substations and the BESS) where runoff controls are required. Where drainage measures are necessary, these include permeable surfacing, infiltration features, swales and attenuation storage to manage surface water and maintain greenfield runoff behaviour, as applicable.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Where supporting infrastructure is proposed, including the BESS, a different drainage strategy is applied with engineered controls and site specific mitigation appropriate to that infrastructure type, and these areas are assessed separately. **ES Volume 3, Appendix 11-6 Flood Risk Assessment and Drainage Strategy - Lime Down D BESS [APP-215].** **Requirement 13 in Schedule 2 to the Draft DCO [APP-016]** secures that prior to the operation of the Scheme, a CEMP must be submitted to and approved by the relevant planning authority, the CEMP must be substantially in accordance with the Outline CEMP, and all construction works associated must be carried out in accordance with the approved CEMP. **Requirement 13 in Schedule 2 to the Draft DCO [APP-016]** secures that part of the authorised development can commence until, a CEMP is submitted to and approved by the relevant planning authority. The CEMP must be substantially in accordance with the Outline CEMP, and all construction works associated must be carried out in accordance with the approved CEMP.
NFP-005	Transport and Access	Road network The roads serving Norton and Foxley are entirely unsuited to existing local traffic, let alone any additional vehicles. IGP has not included Norton and Foxley as approved access routes to LDSP. However, we expect many site workers commuting in their private cars would, however, 'ratrun' through the two villages. The impact of this traffic and the risk of accidents would be a matter of great concern to local residents.	As presented in **ES Volume 2, Figure 13-1 and 13-2 [APP-146, APP-147]**, the Applicant can confirm that no construction traffic for the Scheme is proposed to be routed through Norton and Foxley. Whilst some construction works may travel to site via these areas, it is expected that the majority of trips will be via the strategic highway network (M4) so it is considered unlikely that these areas will become 'ratruns' as a result of the Scheme.

Reference	Theme	Comments/Issues Raised	Applicant's Response
NFP-006	Noise and Vibration	Noise We have doubts about the information and estimated noise contours provided by IGP. Based on evidence from other solar developments, noise is bound to be a big problem for the two villages during construction and a potential problem thereafter. Norton and Foxley want this to be assessed.	The information presented in **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]** is based on the current state of the Scheme as outlined in **ES Volume 1, Chapter 2: The Scheme [APP-055].** The noise contours presented in **ES Volume 2, Figure 14-2 Daytime Operational Noise Contours [APP-160]** and **Figure 14-3 Night-time Operational Noise Contours [APP-161]** are based on a series of reasonable worst-case assumptions, such as wind in the direction of the receptor, as well as a range of mitigation measures as described in Section 14.9 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066].** Mitigation measures associated with construction activity are presented in Section 14.9 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]** and are committed to through the **Outline Construction Environmental Management Plan [APP-277].** With these measures in place, the assessment concludes that no significant effects from construction noise or vibration are expected. A noise monitoring programme agreed with Wiltshire Council will be carried out during construction. The preparation, approval and implementation of the Construction Environmental Management Plan, substantially in accordance with the **Outline CEMP [APP-277],** is secured through Requirement 13 in Schedule 2 of the **Draft Development Consent Order [APP-016],** ensuring that construction noise and vibration are appropriately controlled. Potential operational mitigation measures are detailed in Section 14.9 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066],** and with such measures in place, significant effects from operational noise are not expected. The **Outline Operational Environmental Management Plan**

Reference	Theme	Comments/Issues Raised	Applicant's Response
			[APP-278] commits to noise levels from the Scheme at residential dwellings being the same as or below those modelled in the ES. This provides assurance that significant effects from operational noise will be avoided, while allowing flexibility in how this is achieved. The preparation, approval and implementation of the detailed OEMP, substantially in accordance with the outline plan, are secured through Requirement 14 of Schedule 2 of the **Draft Development Consent Order [APP-016],** ensuring operational noise is appropriately controlled throughout the lifetime of the Scheme.
NFP-007	Landscape and Visual	Walking and Cycling Many of us in Norton and Foxley are keen dog owners, walkers, joggers, cyclists and horse riders. The prospect of using rights of way caged in by security fencing and unable to appreciate our surroundings is worrying. In practice, we would refuse to make use of such alien pathways and would be deprived of the familiar countryside we love. This reduction in our enjoyment and freedom to choose must be taken into account.	The Applicant has aimed to provide a robust assessment of impacts to tourism and recreation in **ES Volume 1 Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]**, taking into account assessment of the desirability of PROW for future users during the construction, operational, and decommissioning phases of the Scheme. Impacts to the social environment, on amenity, and access to open space and the countryside for leisure (and thus how this will impact upon both physical and mental wellbeing) have been assessed in **ES Volume 1 Chapter 18: Human Health [APP-070]**, with reliance on **ES Volume 1 Chapter 8: Landscape and Visual [APP-060]**. The Applicant confirms that the majority of significant adverse effects can be mitigated, however, the assessment identifies residual significant adverse effects to a small number of PROWs and unsurfaced highways during construction, and to long-distance recreation routes during all phases of the Scheme (due to their regional or national importance). The assessment of human health impacts identifies no residual significant adverse effects. The Applicant does however seek to clarify that PROWs are to be given a minimum 15 m offset from their centreline to the nearest onsite infrastructure. This buffer space would be planted with either hedgerows or low-level ground cover planting to

Reference	Theme	Comments/Issues Raised	Applicant's Response
			encourage either visual screening, or improve biodiversity. These are shown on **ES Volume 2, Figures 3-4-1 to 3-4-5.2 [APP-084]** and secured through the **OLEMP [APP-283]** by Requirement 7 in Schedule 2 to the **Draft DCO [APP-016]**.
NFP-008	Socio-Economics, Tourism and Recreation	The loss in the value of our property Norton and Foxley are traditional Cotswolds villages, containing many characterful buildings of predominantly limestone construction. Up until recently the villages were sought after locations. However, the threat of Lime Down Solar Park (LDSP) has had a marked negative effect on property values and sales as borne out by recent transactions. For personal reasons, some vendors have sold and could not wait for a decision on LDSP. The degree of loss has varied from one property to the next depending on orientation and proximity to LDSP. Discussions with estate agents (who prefer not to go on the record for commercial reasons) indicate reductions in selling prices from 15% to 30%. It is an injustice that, should LDSP be approved, a handful of big landowners and foreign investors would make vast profits whilst the local community suffer both the environmental impact and financial loss. The possibility of this unfair outcome deserves detailed consideration.	Impacts of the Scheme on property prices have not been assessed as these have been agreed by the Planning Inspectorate to be scoped out of assessment in the ES, as set out in **ES Volume 3, Appendix 1-2: Scoping Opinion Response Table [APP-181]**. Whilst the Applicant acknowledges that impacts to property prices is a concern for neighbouring residents and businesses, the Applicant has sought to assess potential effects to neighbouring properties and consult with local residents and provide sufficient information to ensure stakeholders have the best understanding of the likely impacts of the Scheme. Furthermore, published research and evidence to date does not indicate that solar farms have a significant adverse long-term effect to nearby property values.
NFP-009	Site Selection	NORTON VILLAGE - A very special case	There is no general requirement in NPS EN-1 to consider alternatives or establish that the proposed Scheme represents

Reference	Theme	Comments/Issues Raised	Applicant's Response
	and Alternatives	Island Green Power's (IGP) Site Selection report is flawed It is widely known that the proposed location of LDSP was not based on finding the least environmentally damaging site. The search was dominated by the willingness of a handful of major landowners to enter into secret and highly lucrative agreements. IGP's Site Selection report is no more than a post hoc attempt to justify its choice. Aspects of the report have been deliberately skewed to suggest that there is no better site than Lime Down within 20kms of the National Grid. Evidence will be provided at the Examination to challenge IGPs Site Selection report. Having committed itself to Lime Down, the developer has discovered that there is insufficient land to deliver a tolerable layout. The consequences of this are adverse cumulative effects and the concern described in the next paragraph.	the best option from a policy perspective. Although there is no general planning policy requirement to consider alternatives and show the proposals represent the best option, the requirement to describe the alternatives considered by the Applicant is required by the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 and in specific circumstances as set out in NPS EN-1. As discussed in **ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP-056]** and **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185],** the Applicant has adopted a staged approach to site selection and the consideration of alternatives. The first stages of the process involved the identification of the point of connection at the Existing Melksham National Grid Substation and to establish an area of search in which to look for sites. At stages 2 and 3, various environmental constraints were excluded from the search area, and key operational criteria were applied, in order to focus the search on the least constrained areas of land within the search area that had the potential to meet the operational objectives of the Scheme. This revealed 4 potential development areas, which were then assessed against standardised assessment criteria such as land use, flood risk, impacts on cultural heritage and ecological impacts. None of these areas were deemed viable for the Scheme following assessment. Therefore, at stage 5 of the assessment, further constrained areas of land (Grade 3 agricultural land and Flood Zones 2 and 3) were added back into the search area and, with the help of land agents, further areas to assess were identified. However, those areas were assessed against the same standardised assessment criteria as used to assess PDAs 1-4. Further, additional land has been considered at a higher topographic gradient, and a check and balance exercise has been carried out across the search area to identify any other sections of land that should reasonably be considered for assessment. Therefore,

Reference	Theme	Comments/Issues Raised	Applicant's Response
			whilst land agents assisted in identifying land for assessment, other areas of land have also been considered. Further all potential development areas identified have been assessed against a number of factors, not just land availability. As per the description set out in **ES Volume 1, Chapter 3: The Scheme [APP-055]** the total area within the DCO Order Limits encompasses approximately 1,237 hectares (ha). Of this, the 'Solar PV Sites' comprise approximately 749.1 ha of land. Around 479.5 ha of this land is proposed as being required for installation of solar PV, battery storage, and associated infrastructure. The remaining 269.5 ha would provide areas dedicated to ecological mitigation, measurable Biodiversity Net Gain (BNG) delivery, landscaping, offsets and agricultural land managed for environmental enhancement and habitat creation.
NFP-010	Site Selection and Alternatives	Norton would be virtually surrounded by solar infrastructure. If LDSP were approved, life within the village would become intolerable! No respectable developer would contemplate locating major industrial development in such close proximity to an existing rural village community. Despite the obvious impact of LDSP on Norton and the views expressed during statutory consultation, the application's layout immediately adjacent to Norton remains unchanged.	The assessment in **ES Volume 1, Chapter 18: Human Health [APP-070]** has considered the location specific impacts of onsite infrastructure, and has identified Norton as one of the communities most likely to be affected by the Scheme. Indeed, the assessment considers Norton as a community of greater sensitivity to changes in its visual surroundings due to its current rural setting, and the anticipated extent to which the Scheme will change that character and potentially the quality of life for residents and visitors. The assessment considers that whilst this effect would be long-term throughout the Scheme's construction, operational and decommissioning phases, it is not anticipated to be a significant adverse effect to mental health and wellbeing. Whilst the majority of the proposed illustrative layout has not been altered since statutory consultation, the Applicant points to the removal of the small solar areas between Norton and Ladyswood from the Scheme. This has been done to address comments about impacts to the Fosse Way and should help to maintain a more open visual aspect from Norton looking west. Additional landscape mitigation measures (shown on **ES Volume**

Reference	Theme	Comments/Issues Raised	Applicant's Response
			2, Figures 3-4-1 to 3-4-5.2 [APP-084] and secured through the **Outline LEMP [APP-283]** by Requirement 7 in Schedule 2 to the **Draft DCO [APP-016]**) have also been implemented to reduce landscape and visual impacts from locations in, and on the approach to, Norton.

5.15 Easton Grey Parish Meeting

Table 5-15 RR-1220

Reference	Theme	Comments/Issues Raised	Applicant's Response
EGPM-001	Description and DCO Process	Parish of Easton Grey's Relevant Representations Those attending the July 2025 Easton Grey Parish AGM, or who, being unable to attend had expressed a view in advance were, (with one exception by an individual who has a family member with a business interest in the proposal and one abstention due to a professional conflict of interest) unanimously opposed to the Lime Down solar proposal. Easton Grey's submissions on the statutory consultation and targeted consultation have been substantively ignored by the applicant. The position remains unchanged following the submission of the application notwithstanding the minor changes made by the applicant. As a small parish we have no funds to obtain expert advice on the 250+ documents in the PINS Examination library and we are thus at a significant disadvantage in fact checking and/or correcting any misleading statements or omissions. Many of the grounds of opposition are intertwined and difficult to place under specific headings or the chapters used by the applicants in the Environmental Statement. Accordingly, as authorised and obligated by the Easton Grey Parish AGM, I make these representations to the Planning Inspectorate opposing	The Applicant acknowledges that there will be impacts on the community as a result of the Scheme, which may be a source of concern for local residents. The Secretary of State will balance those potential impacts and changes against the urgent need and critical national priority for the Scheme as set out in Government policy. The Applicant has assessed adverse impacts arising from the Scheme and has also set out within the **Environmental Statement [APP-052 – APP-065]** the steps taken to avoid, mitigate and minimise these impacts as far as possible, and has prepared a number of management plans that will ensure that impacts are kept to a minimum. These management plans are secured in the **Draft Development Consent Order [APP-016].** The Applicant recognises that parish councils may not have access to specialist expertise and encourages the Parish to make use of **ES Volume 4, Non-Technical Summary (NTS) [APP-265],** which is specifically designed to summarise the ES in an accessible format for non-technical readers.

Reference	Theme	Comments/Issues Raised	Applicant's Response
		the application but reserving the right to raise further issues by way of Written Representations.	
EGPM-002	Landscape and Visual	A. LANDSCAPE AND VISUAL The core of the Easton Grey Parish is a Conservation Area and almost the entirety of the Parish lies within the Cotswolds AONB/Natural Landscape. The village incudes 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. Lime Down lies in the setting of the AONB/Natural Landscape. 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 including over bye ways and public rights of way. The applicants intend to use 4.5m tracking panels for the most part, or, if that is not possible, 3m panels. Despite statements about mitigation by planting, panels will be visible from properties within Easton Grey and the rolling long views for people using the road from the National Landscape of Easton Grey towards Norton (car drivers, cyclists, horse riders and walkers) will be severely impacted.	Landscape and Visual An assessment of landscape and visual effects are presented in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**. The Landscape and Visual Impact Assessment (LVIA) assesses effects on identified landscape and visual receptors, including residential properties, users of public rights of way and roads, and identifies where significant effects may occur. The LVIA found no significant long term visual effects to residential properties as a consequence of the Scheme. The visual effects of the Scheme are summarised in **ES Volume 3, Appendix 8-3-3 [APP-192]**. Temporary Major/Moderate and Moderate Adverse effects on visual receptors have been recorded across the Scheme during construction and at Year 1. However, for the majority of these receptors, the effects reduce to non –significant levels as a result of the embedded mitigation measures which are set out in Section 8.9 of **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]** and include landscape buffers, retention of existing hedgerows and woodland, and new planting to provide screening and integration over time. The assessment also identifies that there would be some long term significant effects on the visual amenity of users of some localised footpaths, as a result of the Scheme. This predominantly relates to locations where footpaths diagonally cross fields and mitigation planting would be inappropriate to landscape character and the legacy landscape. Those receptors which would experience Significant Long Term Visual Effects are listed in Table 8-30 of the **LVIA [APP-060].**

Reference	Theme	Comments/Issues Raised	Applicant's Response
		For example panels in fields B6-9 will be clearly visible. While these are just examples specific to Easton Grey, the proximity of enormous panels protected by fences and CCTV and supported by noisy infrastructure (inverters and transformers) so close to country roads and Public Rights of Way in other areas of Lime Down would permanently change the landscape which is the reason so many people choose to live in and visit what is now an exceptionally beautiful and peaceful area. In addition to the panels and inverters there would be well one enormous 400kV transformer with a height of 13m and multiple 132kV transformers with a height of 7m all placed on concrete and piled to significant depths and surrounded by high security fences and a battery storage area on a concrete base over an area of up to 5.5 hectares (13.5 acres). Industrial equipment of this scale is wholly unsuited for this area. Many of these changes cannot be mitigated which appears to be accepted by the applicant.	The assessment found that there would be some short term impact to landscape character within the setting of the CNL but due to the avoidance measures embedded within the Scheme, harm to the CNL itself would be minimal with beneficial effects in the long term which would further the purposes of the designation. In respect of visual amenity, some short-term adverse effects would be experienced by a small number of visual receptors with views to and from the CNL. However, these would reduce over time as a result of the proposed mitigation. The assessment of effects on the special qualities of the CNL scoped out 3 SQs as there is no association with the Site. The assessment found that there are no direct effects on the remaining SQs. There are some Minor/ Negligible short-term effects on a small number of visual receptors within the setting of the CNL which effect SQ7 - Tranquillity and SQ13 Archaeology and historic associations. However, these effects are mitigated by Year 15 when proposed vegetation has matured. The assessment also found that there would be beneficial effects on SQ 6 – Biodiversity and nature recovery as a result of the delivery of approximately 119.7 hectares of flower-rich neutral grassland (as defined in the BNG assessment) and SQ 12 - An accessible landscape as a result of the delivery of approximately 12.8km of new permissive paths within the setting of the CNL. The remaining SQs would remain entirely intact. The scale of development within the Order Limits has been significantly reduced from the layout assessed in the Preliminary Environmental Information Report (PEIR) through an iterative design process undertaken in response to consultation and in accordance with the mitigation hierarchy to avoid, reduce and mitigate adverse effects. As part of this design evolution, panels along the edge of the Cotswolds National Landscape and along the Fosse Way have been removed.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Panels along the edge of the CNL were removed from the Order Limits in fields C2, C3 and C4 where significant visual effects on receptors within the CNL were identified. Panels were also removed from fields C1, C6, C8, the western section of C9 and the majority of C10, with this land now proposed for ecological mitigation to protect the setting of the CNL. In addition, panels within fields A11 and A12 were removed and the land repurposed for ecological mitigation to protect the setting of the CNL towards Sherston. The height of the solar PV panels has been assessed using clearly defined design parameters, including a maximum height of 4.5 metres above ground level at maximum tilt, as set out in **ES Volume 1, Chapter 3: The Scheme [APP-055]**. These parameters represent a realistic worst-case scenario for the purposes of the Environmental Impact Assessment. Mitigation measures to address landscape and visual effects are set out in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**, **Figure 3-4-1 to 3-4-5.2 Landscape and Ecology Mitigation Plan [APP-084]** and secured within the **Outline Landscape and Ecological Mitigation Plan (LEMP) [APP-283]** and the **Outline Ecological Protection and Mitigation Strategy (EPMS) [APP-284]**. These documents include proposals for new and enhanced planting, retention of existing hedgerows and woodland, and landscape integration measures to reduce visual effects over time. The LVIA assesses the effectiveness of the mitigation measures over time and concludes that, in the majority of locations, where significant adverse visual effects are recorded, the visual effects would reduce to non-significant as mitigation planting establishes and matures. This demonstrates that the proposed mitigation is effective in

Reference	Theme	Comments/Issues Raised	Applicant's Response
			reducing the visual effects of the Scheme. On this basis, a maximum panel height of 4.5m is not considered excessive. In addition, the Scheme design incorporates minimum offsets from existing landscape features, including residential properties, ancient woodland, woodland, hedgerows, public rights of way and watercourses, to further limit visual impacts. Although these measures reduce the effects of the Scheme on nearly all receptors, as noted above there are 10 receptors which would experience Significant Visual Effects for the duration of the Scheme as set out Table 8-30 of the **LVIA [APP-060].** Mitigation measures to address landscape and visual effects are set out in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**, **Figure 3-4-1 to 3-4-5.2 Landscape and Ecology Mitigation Plan [APP-084].** The preparation, approval and implementation of detailed landscape and ecological management plans, substantially in accordance with the **OLEMP [APP-283]** and **EPMS [APP-284]**, are secured through requirements in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that the identified mitigation measures are delivered and maintained throughout the lifetime of the Scheme. <u>Cultural Heritage</u> The potential effects of the Scheme on cultural heritage, including archaeological assets dated to the Roman and medieval periods, are fully assessed in **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, supported by detailed technical appendices in **ES Volume 3, Appendices 12-1 to 12-8 [APP-219 to APP-232]**. The chapter considers baseline conditions, identifies built and archaeological heritage assets

Reference	Theme	Comments/Issues Raised	Applicant's Response
			within the study area, and assesses likely effects during construction, operation and decommissioning, including effects on setting. The chapter concluded that, following mitigation, the residual effects on any archaeological assets including Roman and medieval period remains, would be neutral/negligible and therefore not significant (see **Volume 3, Appendix 12-8 Cultural Heritage Impact Assessment Tables [APP-232]**). The assessment is underpinned by extensive desk-based research, geophysical survey and evaluation trenching, as detailed in **ES Volume 3, Appendix 12-2: Archaeological Desk-Based Assessments [APP-220] and [APP-221]**, **Appendix 12-4: Archaeological Geophysical Survey Reports [APP-223] and [APP-224]**, and **Appendix 12-5: Interim Evaluation Trial Trenching Reports [APP-225] to [APP-229]**. The Applicant notes that the approach to the assessment has been agreed with Wiltshire Council and the methodology for the mitigation strategy is being discussed with Wiltshire Council and is set out in the relevant Statement of Common Ground to be submitted at Deadline 1. Embedded mitigation measures to avoid or reduce harm to heritage assets are set out in Section 12.9 of **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, with additional mitigation measures detailed in Section 12.11. An overarching archaeological mitigation strategy is provided in **ES Volume 3, Appendix 12-6: Outline Archaeological Mitigation Strategy [APP-230]**, which sets out the framework for further archaeological investigation, recording and protection where ground disturbance cannot be avoided. The preparation, approval and implementation of detailed archaeological Written Schemes of Investigation for each part of

Reference	Theme	Comments/Issues Raised	Applicant's Response
			the Proposed Development, substantially in accordance with **Appendix 12-6 Outline Archaeological Mitigation Strategy [APP-230]**, are secured through Requirement 12 of Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that appropriate protection, recording and mitigation are delivered during the relevant part of the Proposed Development. <u>Tourism</u> The potential effects of the Scheme on tourism and recreation are assessed in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]**, supported by **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]**. The assessment considers baseline tourism activity, visitor attractions, recreational assets and tourism-dependent businesses within the study area. The assessment evaluates potential effects on the use, enjoyment and desirability of nearby tourism destinations, including impacts on individual visitor attractions, recreational routes, events and businesses reliant on tourism. It also considers whether changes to landscape character or visual amenity could influence visitor behaviour. The assessment identifies a worst-case scenario in which a temporary loss of up to 50 tourism-related jobs could occur locally during construction, and a long-term loss of up to 11 tourism-related jobs could occur during the operational phase of the Scheme. This represents a precautionary estimate based on conservative assumptions. The assessment concludes that, while some localised effects on tourism receptors are anticipated to occur, significant

Reference	Theme	Comments/Issues Raised	Applicant's Response
			adverse effects on the wider tourism economy are not anticipated. These findings are fully reported in the ES and will be weighed in the planning balance alongside the Scheme's wider economic and environmental benefits. The Applicant notes that the approach to assessment of tourism impacts is under discussion with Wiltshire Council's Economic and Regeneration Team and is set out in the relevant Statement of Common Ground to be submitted at Deadline 1. Agricultural Jobs The Applicant is cognisant of the impact the Scheme could have on wider agricultural employment associated with tenancies and contracts and so seeks to source ways of retaining agricultural workers, providing reskilling opportunities, or providing re-employment as supported by the measures secured in the **Outline Skills, Supply Chain and Employment Plan [APP-285].** The Applicant has been in discussions with landowners and these discussions have included arrangements regarding existing tenancies. Whilst a worst case could involve the termination of an agricultural tenancy or contract in its current form, alternative operational and management opportunities are available connected to the scheme should consent be granted. Public Rights of Way A detailed assessment of the likely significance of effects from the Scheme on the use and desirability of individual PRoW and

Reference	Theme	Comments/Issues Raised	Applicant's Response
			recreational access to the countryside is included in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** and **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]**. This assessment considers the impact on individual recreational routes, including their practical use, enjoyment and desirability. The Applicant confirms that the majority of significant adverse effects can be mitigated. However, some significant adverse effects to users of PRoW and unsurfaced roads in Lime Down E during construction cannot be mitigated further. No significant residual effects are anticipated during the operational phase of the Scheme. The assessment in **ES Volume 1, Chapter 18: Human Health [APP-070]** also considers the physical and mental health impacts of changes to recreation and countryside access under the assessment topic 'open space, leisure and play', and concludes that no significant adverse effects are anticipated at any phase of the Scheme. The Applicant confirms that existing PRoW are to be protected as far as practicable within the Scheme design, with management measures set out in the **Outline Public Rights of Way and Permissive Paths Management Plan (PROWPPMP) [APP-282]**, confirmed as embedded mitigation in Section 16.9 of ES Chapter 16. New permissive access routes have been incorporated into the Scheme design, shown as Work No. 10 on the **Works Plan [APP-007]** and illustrated on **ES Volume 2, Figure 3-4: Landscape and Ecology Mitigation Plan [APP-084]**. These are identified as additional mitigation and enhancement measures in Section 16.11 of ES Chapter 16. The PRoW and Permissive Paths Management Plan is secured through Requirement 16 of Schedule 2 of the **Draft**

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Development Consent Order [APP-016]. The preparation, approval and implementation of the detailed Construction Environmental Management Plan and Construction Traffic Management Plan, substantially in accordance with the outline plans, are secured through Requirements 13 and 15 respectively in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that impacts on PRoW and recreational routes are appropriately managed during construction. The approach to recreation and access has been discussed with Wiltshire Council's Public Health team and is under discussion with Wiltshire Council's Countryside Access Team and is set out in the relevant Statement of Common Ground to be submitted at Deadline 1. <u>Noise and Vibration</u> An assessment of the effects of the Scheme on noise and vibration is provided in **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**, with supporting technical information supplied in **ES Volume 3, Appendix 14-4: Noise Modelling [APP-237]**. The assessment considers potential noise and vibration impacts during construction, operation and decommissioning, including from solar PV panels and associated infrastructure. The conclusions of the assessment in relation to each phase of the Scheme are set out below. The conclusions of the assessments are made for the Scheme as a whole (i.e. all of its components combined, including the BESS), and therefore any specific component will not have any greater effects than those that have been assessed. The Applicant notes that the approach to noise and vibration has been discussed with Wiltshire Council, as described in

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Section 14.2 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**. In addition, further meetings have been held over the approach to the management plans, and a Statement of Common Ground will be issued and updated throughout examination Construction phase The noise and vibration impacts arising from construction activities are assessed in Section 14.10 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**. For the purposes of the assessment, a reasonable worst-case scenario assuming piling activities has been considered. Mitigation measures associated with construction activity, such as temporary screens and advanced warning of works, are presented in Section 14.9 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]** and are committed to through the **Outline Construction Environmental Management Plan [APP-277]**. With these measures in place, the assessment concludes that no significant effects from construction noise or vibration are expected. A noise monitoring programme agreed with Wiltshire Council will be carried out during construction, as committed to in the **Outline Construction Environmental Management Plan [APP-277]**. The preparation, approval and implementation of the Construction Environmental Management Plan, substantially in accordance with the **Outline CEMP [APP-277]**, is secured through Requirement 13 in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that construction noise and vibration effects are appropriately controlled. Operational phase

Reference	Theme	Comments/Issues Raised	Applicant's Response
			The noise impacts from the operation of the Scheme and its components are assessed in Section 14.10 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**, with supporting modelling provided in **ES Volume 3, Appendix 14-4: Noise Modelling [APP-237]**. The predicted noise levels from the Solar PV Sites have been artificially increased by 3 dB to account for the increased likelihood that the noise from the Scheme would be perceived as distinct from the existing background sound. Potential mitigation measures are detailed in Section 14.9 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**, and with such measures in place, significant effects from operational noise are not expected. The **Outline Operational Environmental Management Plan [APP-278]** commits to noise levels from the Scheme at residential dwellings being the same as or below those modelled in the ES. This provides assurance that significant effects from operational noise will be avoided, while allowing flexibility in how this is achieved. The preparation, approval and implementation of the detailed OEMP, substantially in accordance with the outline plan, are secured through Requirement 14 of Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring operational noise is appropriately controlled throughout the lifetime of the Scheme. <u>Decommissioning</u> The effects of decommissioning on soils and agricultural land are assessed in **ES Volume 1, Chapter 17 Soils and Agriculture [APP-069]**. As stated in this chapter, as well as in Section 2 of the **Outline Decommissioning Strategy [APP 279]** which is secured under Schedule 2, Requirement 20 of the **Draft DCO [APP-016]**, all land will be returned to its original

Reference	Theme	Comments/Issues Raised	Applicant's Response
			use and condition as far as practicable and returned to the landowner. Should the Scheme change ownership before the decommissioning phase, any new owner remains bound by the commitments and obligations set out within the DCO and associated management plans. The effect on agricultural land quality at decommissioning would be influenced by the extent of disturbance caused by the removal of the Solar PV Panels, for example the presence and dimensions of leftover voids or the depth of the remaining underground cables. Currently, the most environmentally acceptable option is to leave the cables in-situ, although the cables could be removed by excavating at regular intervals and pulling the cable through to the extraction point, thus avoiding the need to excavate the entire cable trench. In either case, the disturbance to the land and soil would be less than that likely to occur during the construction phase. Built aspects of the Scheme such as the BESS Area and substations are also subject to the proposal to return the land to its original use and condition, which is primarily agricultural land of Subgrade 3b quality, with some Subgrade 3a at the BESS Area. Measures to manage decommissioning and reinstatement are set out in the **Outline Decommissioning Strategy [APP-279]**, which has been submitted as part of the DCO Application. The Decommissioning Strategy will include robust methodologies and control points to avoid contamination of the underlying land with physical or chemical contaminants and will be applied in conjunction with the Soil Resources Management Plan (SRMP) in order to promote successful reinstatement. A detailed Decommissioning Strategy will be prepared substantially in accordance with the **Outline Decommissioning**

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Strategy [APP-279] and must be submitted to and approved by the relevant local planning authority prior to the commencement of decommissioning. This is secured through Requirement 20 in Schedule 2 of the **Draft Development Consent Order [APP-016]**. In addition, the Applicant is seeking a time-limited consent for the Scheme to have an operational period of 60 years, with decommissioning to take place following cessation of operation. This is secured by Requirement 20 in Schedule 2 of the **Draft DCO [APP-016]**. The Applicant confirms that none of the land will be considered brownfield after decommissioning. The expectation is that the land will return to farming, but the Applicant cannot dictate what will happen to the land post-decommissioning when the Applicant no longer has an interest in the land. <u>Mitigation</u> The Applicant is confident that the proposed management and mitigation measures set out in the **Environmental Statement [APP-052 to APP-265]** are comprehensive and robust and that the Scheme aligns with national and local planning policy; this is outlined in the **Planning Statement [APP-267].** Of particular relevance are Annex A: National Policy Statement Accordance Tables and Annex B: Local Policy Accordance Tables, of the Planning Statement which set out an appraisal of the Scheme against national and local planning policies.
EGPM-003	Hydrology, Flood Risk and Drainage	FLOOD AND RIVER POLLUTION Easton Grey is particularly sensitive to flooding. The bridge in Easton Grey (which is an Ancient Monument) does, if the river rises, act as a dam and will	**ES Volume 1, Chapter: 11 Hydrology, Flood Risk and Drainage [APP-063]** provides an assessment of the Scheme for fluvial and surface water flood risk beyond the Order limits, including potential effects on downstream communities along the River Avon and Gauze Brook, and the assessment

Reference	Theme	Comments/Issues Raised	Applicant's Response
		potentially flood properties and the sewage treatment plant which serves 12 of the houses in the village. The gardens of the properties adjoining the river are already subject to flooding. Several buildings in the village are very sensitive to any change in the water flow through the bridge. The applicant's ES Chapter 11 seems almost solely concerned on whether the infrastructure within the red line would be flooded and does not address the risks to Easton Grey and indeed other villages and towns on the Avon and Gauzebrook which rise dramatically and quickly in the event of heavy rain as surface water cannot be absorbed quickly enough and runs into those water channels. There appears to be no proper analysis as to the effect of thousands of enormous panels, which would be horizontal at night. These panels would, by acting like a "*roof*", reduce the absorption capacity of the soil below and increase concentration of the water which would run straight into the Avon and Gauzebrook in times of significant and/or sustained rainfall. As a matter of common sense, solar panels on this scale will have the effect identified above. See plate 3.3 in APP055 for image of panel in horizontal position and the areas of ground below which would be covered by this kind of	concludes that the Scheme would not increase flood risk or alter flood behaviour at Easton Grey. The assessment considers catchment response, existing flood mechanisms and downstream receptors, and confirms that the Scheme does not increase runoff rates or volumes leaving the Order Limits. The representation raises concern that solar panels would act as a roof, reduce infiltration and concentrate runoff into receiving watercourses. The submitted assessment presented in **ES Volume 3, Appendix 11-1 Flood Risk Assessment and Drainage Strategy - Lime Down Covering Report [APP-210]** reflects established hydrological evidence that the addition of solar panels over a vegetated field does not materially increase runoff volumes, peak discharges or response times, and that changes in hydrologic response are primarily associated with alterations to ground cover beneath the panels rather than the panels themselves. Panelled areas are therefore designed so rainfall continues to drain to ground, with no creation of extensive impermeable surfaces and with controls in place to avoid any increase in discharge to watercourses. Construction and operational risks are addressed separately within **ES Volume 1, Chapter 17: Soils and Agriculture [APP-069].** Construction phase controls to manage soil compaction, sediment laden runoff and pollution risk are secured through the **Outline Construction Environmental Management Plan [APP-277],** while supporting infrastructure is subject to site specific engineered drainage and pollution control measures where appropriate. The assessment concludes that there would be no increased risk of flooding or pollution at Easton Grey, including effects on constrained features and wastewater assets.

Reference	Theme	Comments/Issues Raised	Applicant's Response
		panel. The development will make what is already a difficult situation far worse as a result. So far as we are aware there is no solar development of this size using this kind of panel, and certainly not in an area with this kind of geology and so it is unclear how any proper assessments of increased flood risk could be made. We cannot overemphasise the lack of tolerance and susceptibility to serious flood issues if changes to the river flow occur. In the recent Storm Claudia the Easton Grey bridge coped but the river rose from 0.4m to over 1.06 m to within in a few hours as a result of surface run off. The impact of huge numbers of panels, not to mention the compacted soil from construction and the vast amount of concrete needed for the infrastructure and risk to current drainage channels which have worked so well for centuries does not appear to have been considered adequately and is a serious and unacceptable new risk to Easton Grey and other villages and towns downstream from Lime Down. The threat to the village is exacerbated by the fact that the sewage treatment plant that serves most of the village sits beside the Green in the centre of the village before discharging into the river. The location and levels are shown in a	

Reference	Theme	Comments/Issues Raised	Applicant's Response
		measured plan done by D&H surveys. The position in this regard is noted in the Easton Grey Flood Plan. The result of increased risk and magnitude of flood will not only be to properties but to rainwater entering the sewage system. It is of note that the licence granted by the Environment Agency South West Region (consent number 101899 and dated 13th May 2002) has a condition that surface water will be kept separate from domestic effluent. It is not apparent that the applicants have given any consideration to the risk of increased surface water and its effect on flooding and pollution nor how the affected householders in Easton Grey would be held harmless from such effects and potential legal or other action arising from a breach of the EA licence where the causation is, with advance knowledge, the fault of others involved with promoting and constructing Lime Down Solar Park.	
EGPM-004	Cumulative Effects	CUMULATIVE EFFECT Lime Down is of an industrial scale. Each of the 5 areas A-E would itself be considered an NSIP. The cumulative effect of those 5 separate areas would effectively change for ever an area of 46 square kilometre. It is noted that despite reference to mitigation it has been acknowledged that the panels and other infrastructure will remain	Regarding cumulative effects of the Scheme, a comprehensive Cumulative and In-Combination Effects Assessment has been undertaken in accordance with Planning Inspectorate Advice Note 17 and the relevant NPS EN-1, NPS EN-3 and NPS EN-5 requirements which are set out within **ES Chapter 21: Cumulative and In-Combination Effects [APP-073]** and **Appendix 21-1 Long List of In-Combination Effects and Cumulative Developments [APP-264]**. In-combination effect interactions during the construction, operation and decommissioning phase do not increase the significance of

Reference	Theme	Comments/Issues Raised	Applicant's Response
		visible. The proposal is completely inappropriate to our area with its AONB/National Landscape, Conservation Areas, listed buildings and ancient monuments, including the historic unmade up areas of the Roman Fosse Way. The area that is a gateway from the M4 to the Cotswolds and, not least to Easton Grey, will be changed from a welcoming rural landscape into an industrialised zone. The size and scale of the panels and the associated inverters, BESS and transformers is unlike anything which has been built in the UK let alone in an area of exceptional landscapes and heritage. Statements in the ES that assumptions have been based on similar projects are misleading since no similar projects have ever been built, certainly not in England or in an area so close to the National Landscape. There are already many smaller and more sensitively located solar developments in the area.	effects. No significant inter project cumulative effects are identified other than Skylark at a District Level during the operational phase and on four PRoWs and Corsham Park (tourism and recreation) during the construction phase. The Applicant is confident that the management and mitigation measures proposed are comprehensive and robust and that the Scheme aligns with national and local planning policy; this is outlined in the **Planning Statement [APP-267].** The Applicant acknowledges that there will be impacts on the community as a result of the Scheme, which may be a source of concern for local residents. The Secretary of State will balance those potential impacts and changes against the urgent need and critical national priority for the Scheme as set out in Government policy. The Applicant has assessed adverse impacts arising from the Scheme and has also set out within the **Environmental Statement [APP-052 – APP-065]** the steps taken to avoid, mitigate and minimise these impacts as far as possible, and has prepared a number of management plans that will ensure that impacts are kept to a minimum. These management plans are secured in the **Draft DCO [APP-016].** The potential effects of the Scheme on the Roman Roads (i.e. the Fosse Way), as well as other Roman archaeological assets are fully assessed **in ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, supported by detailed technical appendices **in ES Volume 3, Appendices 12-1 to 12-7 [APP-219 to APP-231]**. Where an adverse effect has been identified, mitigation is proposed. See Section 12.9 of **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]** for embedded mitigation and Section 12.11 for additional mitigation. An overarching archaeological mitigation strategy is provided in **ES Volume 3, Appendix 12.6 Archaeological Mitigation Strategy [APP-230]**. Mitigation will be secured through requirement 12 of the DCO.

Reference	Theme	Comments/Issues Raised	Applicant's Response
EGPM-005	Noise and Vibration	NOISE The noise from infrastructure will be constant and intrusive. This is particularly the case for those who live or work near the transformers and the BESS. This will also have an adverse effect on the mental well being of our community. During the construction phase there will be pile driving on a scale which is almost unimaginable. The applicant's documents say each panel would be secured via metal posts driven into ground to an approximate depth of 1.5 m to 4 m. The 132kV and 400kV substations will have piled foundations to a depth of 12 m. The noise from that would be appalling. It is likely that many of the piles will be into bedrock.	The noise impacts from the operation of the Scheme and its components are assessed in Section 14.10 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066],** with supporting modelling provided **in ES Volume 3, Appendix 14-4: Noise Modelling [APP-237**]. A penalty has been applied to predicted noise levels from the Solar PV Sites to account for the distinctive nature of the sound. Potential mitigation measures are detailed in Section 14.9 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066],** and with such measures in place, significant effects from operational noise are not expected. The **Outline Operational Environmental Management Plan [APP-278]** commits to noise levels from the Scheme at residential dwellings being the same as or below those modelled in the ES. This provides assurance that significant effects from operational noise will be avoided, while allowing flexibility in how this is achieved. The noise and vibration impacts arising from construction activities are assessed in Section 14.10 **of ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**. The assessment includes the piling activities described, however solar PV piling uses small mini-piling rigs which are quieter than the worst-case assumption in **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]** and the duration of noise events from such activity would be short. With appropriate mitigation measures as committed to in the **Outline Construction Environmental Management Plan [APP-277],** including prior warning to local residents of any noisy works, no significant effects from construction noise or vibration are expected. A noise monitoring programme agreed with Wiltshire Council will be carried out during construction.

Reference	Theme	Comments/Issues Raised	Applicant's Response
EGPM-006	Other Environmental Matters	BESS Apart from the inappropriate size of the BESS (with up to 270 huge BESS containers to house vast numbers of lithium batteries) it is far larger than required to store energy produced by the panels at virtually all times and is, we understand, a profit generating aspect of the scheme. Indeed, we understand that the scheme has an input capacity from the National Grid of 250MW which shows what is really intended. We also have serious concerns about the risk posed by the BESS were a fire to break out. The fumes from lithium batteries are toxic. Such fires are notoriously difficult to extinguish. The BESS is very close to Hullavington and to the mainline railway from London to Bristol and on to Wales.	The Applicant notes that lithium-ion technology is currently the industry standard for utility-scale battery energy storage due to its proven efficiency, reliability and operational safety. Potential environmental and safety effects associated Building Failure, Fire and Associated Explosions (including risk posed by the BESS) are assessed in **ES Volume 1, Chapter 20: Other Environmental Matters, Section 20.7: Major Accidents and Disasters [APP-072].** This assessment considers credible worst-case accident scenarios and concludes that, with embedded mitigation and appropriate management measures, no significant adverse effects are anticipated. The Applicant notes that the approach to BESS safety is under discussion with Dorset & Wiltshire Fire & Rescue Service (D&WFRS) and is set out in the relevant Statement of Common Ground to be submitted at Deadline 1. An **Outline Battery Safety Management Plan (OBSMP) [APP-286]** has been submitted with the Application. The OBSMP confirms that a robust and validated Emergency Response Plan (ERP) will be developed at the detailed design stage in consultation with Dorset & Wiltshire Fire and Rescue Service. Section 5.4 of the OBSMP specifies the typical emergency response protocols, procedures and safety information that will be included in ERPs. ERPs will be drafted and approved for all stages of the Scheme, including construction, operation, and decommissioning. The Applicant has followed National Fire Chiefs Council (NFCC) guidance and commissioned a Plume Assessment Study to model toxic gas emissions and visibility impacts from a BESS fire on all sensitive receptors within a 1km radius of the BESS area. The fire emissions modelled in the report were based upon recent UK Health Security Agency (UKHSA) requests for

Reference	Theme	Comments/Issues Raised	Applicant's Response
			DCO BESS projects which explore both immediate air quality impacts together with annual UK air quality requirements. Six worst case BESS fire locations (i.e. locations within the BESS Area closest to sensitive receptors) have been modelled as depicted in **ES Volume 2, Figure 15-5: Battery Energy Storage System Fire Emissions Study Area [APP-166].** The Concentrations of carbon monoxide (CO), formaldehyde, hydrogen chloride (HCl), hydrogen cyanide (HCN), hydrogen fluoride (HF), ammonia (NH_3), nitrogen dioxide (NO2) and particulates from a potential BESS fire have been modelled using an air quality dispersion model to determine the likely effects on human health. A high-level visibility assessment has also been undertaken using the modelled particulates results to determine the effect of BESS fire emissions on visibility on the local road and rail network to inform the **OBSMP [APP-286]**. The Plume Assessment Study has concluded that there are no significant toxic emission or visibility impacts at all sensitive receptor locations. The Applicant has also committed to commissioning an additional Plume Analysis Study at the detailed design stage as stipulated in Section 5.5.9 of the OBSMP and secured through the DCO: "*..at the detailed design stage a BESS system and site specific Plume Analysis study will be conducted to assess the environmental impact of a site incident to sensitive receptors within a 1 km radius. Toxic gas emissions to sensitive receptors must be below relevant public health exposure limit guidelines when the battery system of a BESS is fully consumed (burnt out), production of Particulate Matter (PM) and a visibility impact assessment on any transport links within a 1 km radius of the BESS area will also be included. The ERP*

Reference	Theme	Comments/Issues Raised	Applicant's Response
			produced at the detailed design stage (template outlined in Section 5.4.4) will incorporate all necessary emergency response procedures and actions based upon thermal runaway test data supplied by the BESS system provider." As now mandated under NFPA 855 (2026), the Applicant will only be able to select a BESS system that has undertaken Large Scale Fire Testing (LSFT). At the detailed design stage, the selected BESS LSFT data will be leveraged to fully inform inputs for risk assessment tools which will be utilised together with detailed consequence modelling to provide a comprehensive site operations and emergency response safety audit, this is stipulated in the **OBSMP [APP-286]** pre-construction requirements. Section 5 of the **OBSMP [APP-286]** covers all requisite firefighting requirements for the Scheme including fire service access, firefighting water supply, and emergency planning requirements. The **OBSMP [APP-286]** is secured through Requirement 6 (Battery safety management) in Schedule 2 of the **Draft DCO [APP-016]**, which provides that Work No. 2 must not commence until a Battery Safety Management Plan has been submitted to and approved by the relevant planning authority. The approved plan must be substantially in accordance with the **OBSMP [APP-286].** The Draft DCO also requires the relevant planning authority to consult with Dorset and Wiltshire Fire and Rescue Service and the Environment Agency before determining the application, and that the Battery Safety Management Plan must be implemented as approved. On this basis, the Applicant considers that the Scheme incorporates appropriate safety and mitigation measures to

Reference	Theme	Comments/Issues Raised	Applicant's Response
			manage BESS-related risks and would not give rise to significant adverse environmental or safety effects.
EGPM-007	Ecology and Biodiversity	ECOLOGY AND BIODIVERSITY There are many assurances in the documents of how Lime Down Solar Park will improve biodiversity. None appears to take proper account of the impact that 2 years of construction and the addition of fences would have, nor how birds and bats will be impacted by vast swathes of shiny surfaces and noise. There is no adequate information about who will be responsible for maintenance of the proposed ecological mitigation zones or who will be responsible for the ongoing welfare of the trees and hedges which are said by the applicant to be necessary to mitigate the harm. Easton Grey as a small community has absolutely no funds available to give any assistance and/or take on any obligation or liability. Further, given the scheme is supposedly 'temporary' (which is a dubious suggestion because of its length), it seems all of these benefits said to come with the scheme will be left to go into disrepair and lost anyway. There is a significant lack of detail in relation to the destruction of hedgerows and trees which will be necessary to allow access by HGVs to the access points identified. The lack of detail in relation to the panels and	Potential impacts of the Scheme on ecology and biodiversity are assessed in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**, which considers baseline conditions and evaluates likely effects during construction, operation and decommissioning. These includes potential effects arising from the impact of noise and lighting on sensitive wildlife during both the construction phase and operation and maintenance phase, as well as impacts from permanent or temporary hedgerow removal required for site access. The assessment identifies embedded and additional mitigation measures and concludes that, with these measures in place, no unacceptable significant adverse effects on ecology and biodiversity are anticipated. A comprehensive package of habitat creation and enhancement measures are shown in **ES Volume 2, Figure 3-4: Landscape and Ecological Mitigation Plan [APP-084]** and detailed in the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]**.The preparation, approval and implementation of the detailed Landscape and Ecological Management Plan, substantially in accordance with the **OLEMP [APP-283]**, will be secured through Requirement 7 in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that the identified habitat creation and enhancement measures are delivered and maintained throughout the lifetime of the Scheme. Either the Applicant or (should the Applicant transfer the Scheme to a suitably qualified party) the future Scheme owner will be responsible for appointing land managers / contractors to ensure all measures within the detailed LEMP are delivered. Any breach of development consent order or failure to comply with Requirements can result in enforcement action.

Reference	Theme	Comments/Issues Raised	Applicant's Response
		the glint from them and security lights, and the noise from the motors and other infrastructure makes any assessment of the impact on sensitive animals and insects, during the operative period of the scheme, let alone during construction, impossible to judge and something which needs to be carefully considered during the Examination.	
EGPM-008	Cultural Heritage	HERITAGE We are concerned that there are to be panels on fields close to the Fosse Way where important artefacts have been found e.g. field B6. Many archaeological remains have been found by local enthusiasts. At Easton Grey there is an important Roman settlement	**ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, supported by appendices in **Volume 3 (12.2 to 12.5) [APP-220 to APP-230]** has assessed the potential impact of the scheme on archaeological assets. Desk-based research (**Volume 3, Appendix 12.2: Archaeological Desk-Based Assessments [APP-220 to APP-221]**) and archaeological evaluation (Appendix 12.3: Air Photo and LiDAR Mapping and Interpretation, Appendix 12.4, Archaeological Geophysical Survey Reports, and **Appendix 12.5: Interim Evaluation Trial Trenching Reports [APP-222 to APP-229]**) have successfully been used to identify archaeological sites and have informed the overarching archaeological mitigation strategy is provided in **ES Volume 3 Appendix 12.6 Archaeological Mitigation Strategy (AMS) [APP-230]**. Iron Age and/or Roman features were identified in Field B6, which as detailed in Table 6.1.1 of the **AMS [APP-230]** are proposed to be preserved in situ preservation using a non-intrusive construction methodology.
EGPM-009	Transport and Access	ROADS AND TRAFFIC The local roads are wholly unsuited to the number and size of vehicles which would be required to construct Lime	The assessment presented in Annex H of **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]** includes an analysis of accident collisions in the study area and construction routes **ES Volume 1, Chapter 13: Transport and**

Reference	Theme	Comments/Issues Raised	Applicant's Response
		Down. For those in Easton Grey (and there are issues for others not addressed in these representations) the number of HGVs (even on the applicant's figures) which would use the road towards Hullavington, which is the main route from Easton Grey to Exit 17 M4 or Chippenham is 76 per day. These are the applicant's numbers and are believed to be significantly underestimated. The road is not capable of taking HGVs passing each other. It would make the road effectively unusable and/or dangerous for drivers, let alone cyclists who use this road in large groups. The road is simply unsuitable for this level and type of traffic. For other areas of Lime Down there are also serious traffic issues and the narrow country roads with dangerous bends used by horse riders, pedestrians and cyclists, as well as cars could not cope with the increased traffic. The suggestion that most of the construction workers would come in minivans seems fanciful. It is inevitable that cars will try to cut through Easton Grey to get to Lime Down sites and the road is already dangerous with regular accidents. Any increase in traffic will further damage the verges to what is, in Easton Grey's case, on the road from the B4040 to Norton, a single track road with passing places. The	**Access [APP-065]** concludes The low level of construction traffic associated with the Scheme is unlikely to materially affect road safety on the links in the Study Area, and the effects on accidents and safety from the Scheme's construction phase on all links will be temporary and negligible (not significant). This is summarised in Table 13-31 of this chapter. Annex H of **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]** , demonstrates adequate carriageway width and/or adequate frequency of passing places providing opportunity to pass at least an HGV and a light vehicle as requested in comments provided by Wiltshire Council in its response (August 2025) to the Transport Assessment Scoping Note and confirmed in RR4934 Paragraph 4 of 'Appendix A - Highways and Transport Document Review - Detailed Comments'. This confirms that no passing bay or widening improvements are needed to accommodate these movements on the construction route outside of the Order Limits. The distances between passing points outside of the Order Limits are all within 150 m with forward visibility extending to the next passing point and beyond. This is within the generally accepted distance of 200 metres, for example, the HS2 Rural Road Design Criteria stated visible passing places must be provided on single-track roads at a maximum spacing of 200 metres. No roads are proposed to be closed for the construction of Lime Down. In regard to car trips routing through Easton Grey this is unlikely to be significant during the temporary construction period due to measures committed to and secured through and the **OCTMP [APP-287]** such as: • a construction worker travel plan;

Reference	Theme	Comments/Issues Raised	Applicant's Response
		increase in usage of the roads leading to Lime Down will be caused by closures of other roads to facilitate the construction of Lime Down and will be a further detriment to the residents of Easton Grey and neighbouring villages. Alternative routes will already be affected by other elements of Lime Down, particularly the A429 between Corston and the "*Go Karting*" roundabout. Further disruption to traffic will be caused by the works to create the cable route, details of which have not yet been provided.	• Shuttle Bus - The location where staff will travel from is unknown at this stage as it will depend on the appointed contractor. However, it is envisaged that the majority of non-local workforce will stay at local accommodation and be transported to the Order Limits by shuttle bus to minimise the impact on the strategic and local highway network; • Car sharing – A car sharing scheme will be set up. This will match construction workers who live in a similar area, or who follow a similar route to the Order Limits and encourage them to car share to save costs and reduce their impact on the environment • Excessive widening of existing rural routes to allow two HGVs to pass would be over engineering, because of the following reasons: • temporary nature of the construction period; • trip generation of 76 HGVs on the route to Lime Down D is an estimate of the deliveries on a peak day, so does not represent a daily average; • trip generation of 76 HGVs on the route to Lime Down D is based on the worst-case assumptions, including but not limited to, all phases and Solar PV Sites being constructed simultaneously and a 50% uplift; • average number of HGV construction movements along the route to Lime Down D is only 50 per day/7 per hour/one every 8 minutes (less than the journey time along the route); - assuming a realistic construction programme, the average number of HGV construction movements along the route to Lime Down D is only 32 per day/5 per hour/one every 13 minutes (less than the journey time along the route); • delivery times during the construction phase are limited to those times set out in the **OCTMP [APP-287]**. There

Reference	Theme	Comments/Issues Raised	Applicant's Response
			will be no HGV construction trips outside of these hours; • there would be a much greater impact on hedgerow, trees and character; and • low level of existing HGVs on the route to Lime Down D (average number of existing HGV movements is only 46 per day, with some of these movements occurring outside of proposed construction hours set out in the **OCTMP [APP-287].** Further detail of trip generation has also been added to **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]** which will be submitted at Deadline 1 of Examination. An **oCTMP [APP-287]** supports the DCO Application and presents outline measures which restrict construction deliveries to the proposed construction routes. It also includes road condition surveys to ensure any damage to the highway network caused by construction traffic is identified and rectified, management of construction deliveries to avoid the requirement for HGVs generated by the Scheme passing each other in opposite directions on the local roads, and restricted hours of deliveries outside of peak hours. With this mitigation in place, **ES Volume 1, Chapter 13-1: Transport and Access [APP-065]** concludes that impacts would be negligible to minor adverse. One specific measure provided for in the **oCTMP [APP-287]** is a booking system which will be set up to manage arrivals and departures to the Order Limits. This will be implemented in coordination with banksmen, which will be able to hold back any cross-over, should there be any delays on the roads. This will prevent HGVs generated by the Scheme passing each other in opposite directions on the local roads forming part of the

Reference	Theme	Comments/Issues Raised	Applicant's Response
			construction routes (including this route) and will be confirmed as part of the final CTMP. A final CTMP would be prepared post consent and must be substantially in accordance with the **oCTMP [APP-287]** and approved by the relevant local planning authorities (in consultation with the relevant highway authorities), as secured by Requirement 15 in Schedule 2 of the **Draft DCO [APP-016]**. To provide further comfort, additional information has been added to **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]** which will be submitted at Deadline 1 of Examination. This demonstrates that there is adequate carriageway width and/or passing place opportunity for two HGVs.
EGPM-010	Decommissioning and Construction	MAINTENTANCE AND DECOMMISSIONING There is no information about who and how the responsibility for maintaining the biodiversity areas, new planting or the clean up costs will be met and secured. Reliance on there being a criminal sanction for failure to comply is of no use when the owner of Lime Down is a single purpose company and likely to be owned by foreign investors.	The DCO process itself incorporates enforceable mechanisms to regulate Scheme delivery. Any breach of development consent order or failure to comply with Requirements can result in enforcement action. The preparation, approval and implementation of detailed landscape and ecological management plans, substantially in accordance with the **OLEMP [APP-283]** and **EPMS [APP-284]**, are secured through requirements in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that the identified mitigation measures are delivered and maintained throughout the lifetime of the Scheme.
EGPM-011	Description and DCO Process	PROCUREMENT There is no explanation of where the panels will be manufactured. How can there be a guarantee that the solar panels and the lithium for the batteries will not be from sources which use (Redacted) or that there will not be security issues for infrastructure sourced from China.	**The ES Chapter 7: Climate Change [APP-059]** assessment has used a reasonable conservative assumption that materials will be sourced from China for the purposes of estimating GHG emissions. This does not obligate the developer to use materials from any particular supplier or country of origin but represents a reasonable assessment scenario given that China is the largest manufacturer of solar panels.

Reference	Theme	Comments/Issues Raised	Applicant's Response
EGPM-012	Site selection and Alternatives	ALTERNATIVES The justification given by the applicant for selecting this area seems to be that the land was offered on a voluntary basis. The terms on which landowners have granted options over land, including the duration of the applicant's rights is a closely guarded secret with a refusal to provide details due to (Redacted) imposed by the applicant. It is far from clear that the applicant does have rights over the land for the 60+ years it seeks. It certainly does not have rights over the cable route where dozens of farmers and landowners are being threatened with compulsory acquisition if they do not grant options for easements for the cable. The selection criteria used by the applicant should not be accepted at face value. This is the wrong scheme in the wrong area and far too far from the grid connection.	As detailed in **ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP-056] and ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185],** the Applicant has followed a staged approach to assessment of potential sites, taking into consideration a range of planning, environmental and operational factors. Potentially willing landowners with large scale land holdings within the search area was a consideration, however it is not the only consideration in the site selection process. As set out in the **Statement of Reasons [APP-018]** the Applicant has been seeking to acquire the relevant land, new rights and use of land by voluntary agreement, in order to ensure implementation of the Scheme. Whilst the Applicant is seeking compulsory acquisition powers as part of the DCO Application, the Applicant will continue to seek to acquire the land, the rights and other interests in, on and over the land, the temporary use of land, as well as secure the removal of matters affecting the Order land that may impede the Scheme, by agreement wherever possible. the **Land Rights Negotiations Tracker [APP-021]** sets out the position in relation to the negotiations undertaken to date with affected owners.
EGPM-013	Community Benefits	COMMUNITY BENEFIT As far as we are aware no benefit will accrue to the local community. All electricity generated will go to the main grid and all profits from the power generated and from the BESS trading will go to the owner of Lime Down Solar Park Limited. The ultimate ownership is very likely to be foreign. The local community and its businesses will most certainly suffer detriment and increased risk of flooding, reduction in	The Applicant acknowledges that many of the benefits of the Scheme are felt over a wider area than the adverse effects from the Scheme. As highlighted, this includes energy generation, and so is a nationwide benefit. Employment and economic benefits from direct employment, maintenance and supply chains will likely be county-level or regional, albeit measures secured through the **OSSCEP [APP-285]** seek to improve local economic prosperity from the Scheme. Locally specific benefits largely are based around landscape and ecological enhancements, and the provision of permissive paths to improve PROW access and connectivity. The proposed landscape and ecological enhancement measures are

Reference	Theme	Comments/Issues Raised	Applicant's Response
		property prices and the ruination of areas of particular natural beauty and historic interest, right beside an area of Natural Landscape. During construction the roads will be impassable preventing people from getting to work on time or getting to schools. No new jobs will be created for locals. The community loses in every way. The only people to benefit are the landowners who have contracted on unknown terms to allow their land to be used.	illustrated in Figure 3-4-1 to 3-4-5.2 **Landscape and Ecology Mitigation Plan [APP-084]**, and details of creation, management and monitoring of such measures are set out in the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283].** The assessment in the ES has sought to assess the likely significance of effects in relation to economic environment, flooding, landscape, heritage, and transport, with any required mitigation measures secured through the requirements in Schedule 2 to the **Draft DCO [APP-016].** While landowners are to benefit directly from the option agreements on the land proposed for above-ground infrastructure, the general community is also able to benefit from the Community Benefit Fund, which can be used towards local infrastructure and benefits as decided by local stakeholders. The Community Benefit Fund is however agreed under a separate process to the DCO and so does not form part of the assessment of whether the DCO should be consented or not.
EGPM-014	Climate Change and Energy Need	CARBON BENEFIT AND GREEN CREDENTIALS So far as we are aware there is no material to explain how the panels and lithium batteries which will have to be replaced on a number of occasions will be recycled. There is clearly a huge carbon footprint in sourcing materials from (probably) China and in the construction of the infrastructure over the 5 sites and the very long cable route to Melksham.	Details of the disposal and end-of-life management of the Battery Energy Storage System (BESS), including lithium-ion batteries, are provided in **ES Volume 1, Chapter 20: Other Environmental Matters [APP-072], Section 20.3: Materials and Waste**. This section confirms that recycling routes for solar PV panels and BESS components are generally available at present, and that these routes are expected to expand further over the lifetime of the Scheme as the recycling market grows in response to increasing deployment of renewable energy infrastructure. The Materials and Waste assessment also confirms that the Scheme will follow the waste hierarchy, prioritising reuse and recycling wherever reasonably practicable, with disposal as a

Reference	Theme	Comments/Issues Raised	Applicant's Response
			last resort. **An Outline Site Waste Management Plan (SWMP) [APP-281], Outline CEMP [APP-277], Outline OEMP [APP-278]** and **Outline Decommissioning Strategy [APP-279]** have been submitted with the Application, which set out how waste — including BESS components — will be managed during construction, operation and decommissioning. These documents commit to segregation of materials on-site and to the use of appropriately licensed waste contractors and facilities. On this basis, the assessment concludes that the Scheme would not give rise to significant adverse effects in relation to materials use or waste management, and that appropriate recycling and disposal routes for lithium-ion batteries are available and expected to improve further over time. Notably Requirement 19 in **Schedule 2 of the Draft DCO [APP-016]** secures that, prior to commencement of construction, a detailed SWMP must be submitted to and approved by the relevant planning authority, and that construction must be carried out in accordance with the approved plan. Moreover, Requirement 20 secures that, prior to decommissioning of the Scheme, a Decommissioning Strategy must be submitted to and approved by the relevant planning authority. The Decommissioning Strategy must detail removal of above-ground infrastructure and appropriate management of all resulting waste, including recycling of BESS components where practicable. The 'carbon footprint' of sourcing materials is considered within **ES Volume 1, Chapter Climate Change [APP-059]** and it is concluded that the potential savings from the scheme outweigh the emissions required from products associated with the development.

Reference	Theme	Comments/Issues Raised	Applicant's Response
EGPM-015	Description and DCO Process	CONCLUSION Easton Grey Parish opposes Lime Down for the reasons given above and reserves the right to raise further points as the missing details of the scheme are developed and further details of what is planned are assessed from the tens of thousands of pages of material which have been submitted by the applicant.	The Applicant notes this comment. Please see the Applicant's responses above which respond to the specific issues raised throughout the representation made by Easton Grey Parish Council.

5.16 Malmesbury Town Council

Table 5-16 RR-2932

Reference	Theme	Comments/Issues Raised	Applicant's Response
MTC-001	Description and DCO Process	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.	The Applicant notes this comment and responds to each of Malmesbury Town Council's specific concerns below.
MTC-002	Landscape and Visual	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	The effects of the Scheme on agricultural land, including Best and Most Versatile (BMV) agricultural land and soil resources, are assessed in **ES Volume 1, Chapter 17: Soils and Agriculture [APP 069]**, supported by **ES Volume 3, Appendix 17 1: Agricultural Land Classification and Soil Resource Survey Report [APP 243]**. That assessment identifies that the Scheme will result in significant adverse effects on BMV agricultural land, but that this will be a temporary and reversible loss of land during the operational period, with land reinstated and returned to agricultural use as far as practicable following decommissioning. The assessment also explains that reduced disturbance during operation allows soils to recover from

Reference	Theme	Comments/Issues Raised	Applicant's Response
		and enhance national landscapes and this development contradicts this principle.	previous intensive agricultural use, with benefits to soil structure and soil biology. National planning policy recognises the benefits of BMV agricultural land and encourages the use of lower quality land where possible; however, agricultural land quality is one of a number of sustainability considerations to be weighed in the planning balance. <u>Cotswolds National Landscape</u> The Cotswolds National Landscape (CNL) is fully assessed as a standalone receptor within **ES Volume 3, Appendix 8.6: Assessment of Effects on the Special Qualities of the Cotswolds National Landscape [APP-197]**. This assessment considers the effects of the Scheme on landscape character, visual amenity and the special qualities of the CNL, including tranquillity. The assessment found that there would be some short term impact to landscape character within the setting of the CNL but due to the avoidance measures embedded within the Scheme, harm to the CNL itself would be minimal with beneficial effects in the long term which would further the purposes of the designation. In respect of visual amenity, some short-term adverse effects would be experienced by a small number of visual receptors with views to and from the CNL. However, these would reduce over time as a result of the proposed mitigation. The assessment of effects on the special qualities of the CNL scoped out 3 SQs as there is no association with the Site. The assessment found that there are no direct effects on the remaining SQs. There are some Minor/ Negligible short-term effects on a small number of visual receptors within the setting of the CNL which effect SQ7 -Tranquillity and SQ13 Archaeology and historic associations. However, these effects are mitigated by

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Year 15 when proposed vegetation has matured. The assessment also found that there would be beneficial effects on SQ 6 – Biodiversity and nature recovery as a result of the delivery of approximately 119.7 hectares of flower-rich neutral grassland (as defined in the BNG assessment) and SQ 12 - An accessible landscape as a result of the delivery of approximately 12.8km of new permissive paths within the setting of the CNL. The remaining SQs would remain entirely intact. The Scheme was refined through an iterative design process to avoid and reduce effects on the CNL and its setting. Panels along the edge of the CNL were removed from the Order Limits in fields C2, C3 and C4 where significant visual effects on receptors within the CNL were identified. Panels were also removed from fields C1, C6, C8, the western section of C9 and the majority of C10, with this land now proposed for ecological mitigation to protect the setting of the CNL. In addition, panels within fields A11 and A12 were removed and the land repurposed for ecological mitigation to protect the setting of the CNL towards Sherston. All land parcels adjacent to the CNL are proposed to deliver habitat enhancement, informed by the CNL Management Plan and the Cotswolds National Landscape Strategy and Guidelines, to further the purposes of the designation. Details of the proposed landscape and ecological mitigation and enhancement measures such as the avoidance measures to remove panels from the boundary of CNL are provided in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060], Figure 3-4-1 to 3-4-5.2 Landscape and Ecology Mitigation Plan [APP-084]** and secured within the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283],** and the **Outline Ecological Protection and Mitigation Strategy (EPMS) [APP-284]**.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			The preparation, approval and implementation of the detailed Landscape and Ecological Management Plan, substantially in accordance with the **OLEMP [APP-283]**, are secured through Requirement 7 in Schedule 2 of the **Draft Development Consent Order [APP-016]**. The preparation, approval and implementation of the detailed Ecological Protection and Mitigation Strategy, substantially in accordance with the **EPMS [APP-284]**, are secured through Requirement 8 in Schedule 2 of the **Draft Development Consent Order [APP-016]**. These requirements ensure that the identified mitigation and enhancement measures are delivered and maintained throughout the lifetime of the Scheme.
MTC-003	Consultation and Engagement	Impact to Malmesbury In the most recent round of consultation, residents of Malmesbury were excluded from information provided by Lime Down. This is a blatant and inexcusable omission, with residents metres from the town boundary in Malmesbury St Paul Without included in distribution. We believe the process to date has not provided a rounded view on the impact of visual impact, glare and noise.	Operational phase The noise impacts from the operation of the Scheme and its components are assessed in Section 14.10 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**, with supporting modelling provided in **ES Volume 3, Appendix 14-4: Noise Modelling [APP-237]**. A penalty has been applied to predicted noise levels from the Solar PV Sites to account for the distinctive nature of the sound. Potential mitigation measures are detailed in Section 14.9 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**, and with such measures in place, significant effects from operational noise are not expected. The **Outline Operational Environmental Management Plan [APP-278]** commits to noise levels from the Scheme at residential dwellings being the same as or below those modelled in the ES. This provides assurance that significant effects from operational noise will be avoided, while allowing flexibility in how this is achieved. The preparation, approval and implementation of the detailed OEMP, substantially in accordance with the outline plan, are

Reference	Theme	Comments/Issues Raised	Applicant's Response
			secured through Requirement 14 of Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring operational noise is appropriately controlled throughout the lifetime of the Scheme.
MTC-004	Socio-Economics, Tourism and Recreation	This committee has already raised and detailed concerns to Malmesbury directly from this development, which include issues around Traffic, Flooding, Water Run-Off & Health, Emergency Preparedness and Construction Pollutants. One issue that has once again been omitted from consideration is the material impact on Tourism – a sector vital to the economic status of the town. It is also evident no consideration has been given to the Emotional and Physical Health and Wellbeing of residents in the wider community who will suffer from the loss of amenity associated with living in a rural or semi-rural setting.	The Applicant has aimed to provide a robust assessment of impacts to tourism and recreation **in ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068].** Therein, the Applicant has assessed that there is a likely worst-case temporary loss of 50 FTE tourism industry jobs as a result of the Scheme. This is based on likely construction impacts including increased HGV use of the local highway network, visual and amenity impacts, and impacts on the use of PROWs. This estimate does not account for additional mitigation measures being applied. This effect on GVA in tourism-dependent industries is not significant, accounting for less than 0.7% of tourism-based employment within 5 km of the Scheme (BRES, 2023 data), and approximately 0.17% of tourism employment across Wiltshire (29,000 estimate from Visit Wiltshire, 2021). This is also a temporary effect, anticipated to occur during construction, with recovery to tourism businesses anticipated to begin as soon as construction works are complete. During the Scheme's operational phase, the reduction in tourism compared to current conditions is anticipated to be equivalent to a loss of 11 FTE tourism-dependent jobs. Additional mitigation measures have been secured through the **OCTMP [APP-287], OPROWPPMP [APP-282]** and the **OSSCEP [APP-285].** Together these seek to reduce these losses to tourism through mitigating traffic impacts, impact to PROWs, and focusing on local recruitment, promoting local suppliers where practicable, and through providing retraining opportunities for workers in tourism-dependent industries. These measures are secured by the relevant requirements in Schedule 2 to the **Draft DCO [APP-016].**

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Impacts to the social environment, on amenity, and access to open space and the countryside for leisure (and thus how this will impact upon both physical and mental wellbeing) have been assessed in **ES Volume 1, Chapter 18: Human Health [APP-070],** taking into account environmental impacts assessed in other technical chapters of the ES. This has focused on a 2 km Study Area around the Scheme's Order Limits, and within that area finds there are no anticipated significant adverse effects to human health resulting from the Scheme.
MTC-005	Description and DCO process	Summary Our opposition to the Lime Down Solar Park stands, as does our call for a robust consultation process with local stakeholders. Many of the points raised above have yet, in our opinion, to be comprehensively considered and we would support Wiltshire Council's call for a supplementary public consultation." ENDS Cllr Phil Exton Chair, Planning & Environment Committee Malmesbury Town Council – 01/12/25	The Applicant confirms that it has responded in detail above to the points raised in Malmesbury Town Council's Representation. To confirm, the Applicant considers that the statutory consultation has been robust, thorough and undertaken in accordance with the requirements of the Planning Act 2008, the Environmental Impact Assessment (EIA) regulations, and the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009. The **Consultation Report [APP-022]** sets out the Applicant's approach to pre-application consultation. The Applicant notes that the examination process provides a further opportunity for interested parties to comment on the Scheme. This examination is managed by an independently appointed Examining Authority. Further to this, the Applicant provided an extended relevant representation period beyond the minimum statutory timeframe to allow sufficient time to review the submitted application documents and register as an interested party. The Applicant will continue to engage constructively with stakeholders throughout the Examination and will respond to issues raised through the formal Examination process.

5.17 Tormarton Parish Council

Table 5-17 RR-4776

Reference	Theme	Comments/Issues Raised	Applicant's Response
TPC-001	Description and DCO process	Tormarton Parish Council strongly objects to the Lime Down Solar Park development. There are so many reasons why this site is totally inappropriate for such a large solar park development.	The Applicant acknowledges that there will be impacts on the community as a result of the Scheme, which may be a source of concern for local residents. The Secretary of State will balance those potential impacts and changes against the urgent need and critical national priority for the Scheme as set out in Government policy. The Applicant has assessed adverse impacts arising from the Scheme and has also set out within the **ES [APP-052 – APP-065]** the steps taken to avoid, mitigate and minimise these impacts as far as possible, and has prepared a number of management plans that will ensure that impacts are kept to a minimum. These management plans are secured in the **Draft DCO [APP-016]**. The Applicant has responded to each of Tormarton Parish Council's specific concerns below.
TPC-002	Landscape and Visual	The proposed site lies in a quiet, rural location, surrounded by farmland and small villages. It lies within the Cotswolds National Landscape and is renowned for its tranquillity and charm. The site can be seen from higher ground from miles around and will have a huge impact in the region.	The Cotswolds National Landscape (CNL) is fully assessed as a standalone receptor within **ES Volume 3, Appendix 8.6: Assessment of Effects on the Special Qualities of the Cotswolds National Landscape [APP-197]**. This assessment considers the effects of the Scheme on landscape character, visual amenity and the special qualities of the CNL, including tranquillity. The assessment found that there would be some short term impact to landscape character within the setting of the CNL but due to the avoidance measures embedded within the Scheme, harm to the CNL itself would be minimal with beneficial effects in the long term which would further the purposes of the designation. In respect of visual amenity, some short-term adverse effects would be experienced by a small number of visual receptors with views to and from the CNL. However, these would reduce over time as a result of the proposed mitigation. The assessment of effects on the special qualities of the CNL scoped out 3 SQs as there is no association with the Site. The assessment found that there are no direct effects on the

Reference	Theme	Comments/Issues Raised	Applicant's Response
			remaining SQs. There are some Minor/ Negligible short-term effects on a small number of visual receptors within the setting of the CNL which effect SQ7 -Tranquillity and SQ13 Archaeology and historic associations. However, these effects are mitigated by Year 15 when proposed vegetation has matured. The assessment also found that there would be beneficial effects on SQ 6 – Biodiversity and nature recovery as a result of the delivery of approximately 119.7 hectares of flower-rich neutral grassland (as defined in the BNG assessment) and SQ 12 - An accessible landscape as a result of the delivery of approximately 12.8km of new permissive paths within the setting of the CNL. The remaining SQs would remain entirely intact. The Scheme was refined through an iterative design process to avoid and reduce effects on the CNL and its setting. Panels along the edge of the CNL were removed from the Order Limits in fields C2, C3 and C4 where significant visual effects on receptors within the CNL were identified. Panels were also removed from fields C1, C6, C8, the western section of C9 and the majority of C10, with this land now proposed for ecological mitigation to protect the setting of the CNL. In addition, panels within fields A11 and A12 were removed and the land repurposed for ecological mitigation to protect the setting of the CNL towards Sherston. All land parcels adjacent to the CNL are proposed to deliver habitat enhancement, informed by the CNL Management Plan and the Cotswolds National Landscape Strategy and Guidelines, to further the purposes of the designation. Details of the proposed landscape and ecological mitigation and enhancement measures such as the avoidance measures to remove panels from the boundary of CNL are provided in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060], Figure 3-4-1 to 3-4-5.2 Landscape and Ecology Mitigation**

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Plan [APP-084] and secured within the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283],** and the **Outline Ecological Protection and Mitigation Strategy (EPMS) [APP-284]**. The preparation, approval and implementation of the detailed Landscape and Ecological Management Plan, substantially in accordance with the **OLEMP [APP-283]**, are secured through Requirement 7 in Schedule 2 of the **Draft Development Consent Order [APP-016]**. The preparation, approval and implementation of the detailed Ecological Protection and Mitigation Strategy, substantially in accordance with the **EPMS [APP-284]**, are secured through Requirement 8 in Schedule 2 of the **Draft Development Consent Order [APP-016]**. These requirements ensure that the identified mitigation and enhancement measures are delivered and maintained throughout the lifetime of the Scheme.
TPC-003	Human Health	At a time when so much emphasis is placed on wellbeing and mental health, it is totally illogical to destroy an environment that provides wellbeing in its widest sense for so many people, residents and tourists alike. Some of the villages will be surrounded by solar panels, hedgerows and footpaths will be lost and for many residents, the main reason for choosing a rural environment will be destroyed. Who will want to walk in dark corridors of 4.5 metre solar panels and security fences?	**ES Chapter 18: Human Health [APP-070]** has relied upon the assessment outcomes in other technical chapters and sections of the ES to determine the likely effects of the Scheme on physical and mental health and wellbeing. Subject to the implementation of all mitigation measures as secured through the requirements in **Schedule 2 to the Draft DCO [APP-016]**, there are no residual significant adverse effects on human health. In support of this, the Applicant has aimed to provide a robust assessment of impacts to tourism and recreation in **ES Chapter 16: Socio-Economics, Tourism and Recreation [APP-068],** taking into account assessment of the desirability of PROW for future users during the construction, operational, and decommissioning phases of the Scheme. The Applicant confirms that the majority of significant adverse effects can be mitigated through the measures set out in the **OLEMP [APP-283]**, **OCEMP [APP-277]**, **OCTMP [APP-287]**, and **OPROWPPMP [APP-282]**,

Reference	Theme	Comments/Issues Raised	Applicant's Response
			secured by Requirements 7, 13, 15 and 16 in Schedule 2 to the **Draft DCO [APP-016]**. However, the assessment in **ES Chapter 16 [APP-068]** identifies residual significant adverse effects to a small number of PROWs and unsurfaced highways during construction, and to long-distance recreation routes during all phases of the Scheme (due to their regional or national importance). The Applicant does however seek wish to clarify that PROWs are to be given a minimum of 15 m offset from their centerline to the nearest onsite infrastructure. This buffer space would be planted with either hedgerows or low-level ground cover planting to encourage either visual screening or improve biodiversity. These are shown on **ES Volume 2, Figures 3-4-1 to 3-4-5.2 [APP-084]** and secured through the **OLEMP [APP-283]** by Requirement 7 in Schedule 2 to the **Draft DCO [APP-016].**
TPC-004	Ecology and Biodiversity	The natural habitat will be destroyed – hedges and habitats removed. The area is home to a wide and diverse range of wildlife and it is estimated that, for example, over 70% of the skylarks currently on-site will no longer inhabit the area.	Potential impacts of the Scheme on ecology and biodiversity are assessed in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**, which considers baseline conditions and evaluates likely effects during construction, operation and decommissioning. The assessment identifies embedded and additional mitigation measures and concludes that, with these measures in place, no unacceptable significant adverse effects on ecology and biodiversity are anticipated. The assessment identifies skylarks as a key species of conservation interest within the Scheme area. It concludes that a proportion of the current skylark population will be displaced from the Solar PV Sites, which will give rise to an adverse residual effect at a Local level. Skylark-specific mitigation and habitat enhancement measures are incorporated into the Scheme design to reduce effects as far as practicable. These include the provision of suitably large open set-aside and grassland areas habitats, retention of field boundary features, and the creation of habitat areas designed to provide appropriate breeding and

Reference	Theme	Comments/Issues Raised	Applicant's Response
			foraging conditions. These measures are illustrated in **ES Volume 2, Figure 3-4: Landscape and Ecological Mitigation Plan [APP-084]** and detailed in the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]**. The Scheme will create and enhance a wide range of habitats, such as grasslands, hedgerows and ponds, that will benefit a wide range wildlife present in the area. Details of habitat creation and enhancements are set out in the **OLEMP [APP-283]**.
TPC-005	Socio-Economics, Tourism and Recreation	Tourism and farming are the main industries in this region. Large numbers of cyclists and walkers visit throughout the year. Tourism-dependent businesses such as cafes, pubs, holiday rentals and hotels will be severely affected, especially through the construction phase.It is anticipated that some 2000 acres of our best agricultural land for food production will be lost. This will no doubt lead to loss of farming livelihoods and job losses within the agricultural industry.	The Applicant has aimed to provide a robust assessment of impacts to tourism and recreation, and to agricultural employment in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]**. Therein, the Applicant has assessed that there is a likely worst-case temporary loss of 50 FTE tourism industry jobs as a result of the Scheme's construction phase, and a long-term loss of up to 20 FTE agricultural jobs as a result of the Scheme. These impacts are not considered significant, accounting for approximately 0.17% of tourism employment across Wiltshire (29,000 estimate from Visit Wiltshire, 2021) and less than 0.29% of agricultural employment in Wiltshire (BRES, 2023). Additional mitigation measures have been secured through the **OCTMP [APP-287], OPROWPPMP [APP-282**] and the **OSSCEP [APP-285**]. Together these seek to reduce these losses to tourism through mitigating traffic impacts, impact to PROWs, and focusing on local recruitment, promoting local suppliers where practicable, and through providing retraining opportunities for workers in tourism-dependent industries. These measures are secured by the relevant requirements in Schedule 2 to the **Draft DCO [APP-016].**
TPC-006	Cultural Heritage	The area in question consists of 118 archaeological assets, 761 listed buildings and many roman and medieval roads. Surely there are other	The Applicant notes the comment. The Scheme site has been selected following a robust site selection process which considered technical, environmental, and planning constraints (see **ES Volume 1, Chapter 4 Alternatives and Design**

Reference	Theme	Comments/Issues Raised	Applicant's Response
		sites more suitable for this level of development.	**Evolution [APP-056]**). **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, supported by detailed technical appendices in **ES Volume 3, Appendices 12-1 to 12-7 [APP-219 to APP-231]** has assessed the potential impact of the scheme on identified archaeological and built heritage assets. There is the potential for construction groundworks to cause physical damage to archaeological and built heritage assets as well as indirect impacts to the setting of built heritage assets. Where required appropriate mitigation is proposed. Embedded mitigation measures to avoid or reduce harm to heritage assets are set out in Section 12.9 of **ES Volume 1, Chapter 12: Cultural Heritage [APP-064],** with additional mitigation detailed in Section 12.11. An overarching archaeological mitigation strategy is provided in **ES Volume 3, Appendix 12-6: Outline Archaeological Mitigation Strategy [APP-230].** Following mitigation, the residual effects range between Neutral and Minor/Moderate Adverse, not significant.
TPC-007	Description and DCO Process	We are concerned about the long-term influence of this development. The overseas business will own the land and have the right to use it as they see fit at the end of the 60 year solar facility. Will this large-scale industrial site revert to agricultural use, or will it just be a grim legacy for future generations?	The **Statement of Reasons [APP-018]** provides further details of the possession, rights and powers required by the Applicant in order to build, operate, maintain and decommission the Scheme. The Scheme is temporary in nature, and, as set out in **ES Volume 1, Chapter 3: The Scheme [APP-055],** when the operation and maintenance phase ends, the Solar PV Sites would be decommissioned and the land returned to its original use and condition as far as practicable and returned to the landowner. Post-decommissioning, the landowners would choose how the land is to be used and managed. The landowner may return all of the land to arable use, although it is likely that established habitats such as hedgerows and woodland would be retained given their potential benefits. Permissive paths would be

Reference	Theme	Comments/Issues Raised	Applicant's Response
			removed during decommissioning. Further details are provided in the **Outline Decommissioning Strategy [APP-279].**
TPC-008	Soils and Agriculture	The cabling operation from the site to Melksham will cross through valuable farmland and rural landscapes and will destroy the tranquil nature of the existing landscape, as well as causing disruption within the villages and towns it travels through.	The landscape and visual effects of the Cable Route Corridor will be temporary in nature and are set out in Appendix 8-3-4 of the **ES: Landscape and Visual Assessment Sheets - Cable Route Corridor [APP-193].**
TPC-009	Transport and Access	But it is the communication and road infrastructure around the proposed development and southwards towards Melksham that concerns us most. Our lanes and roads are not suitable for the large HGVs travelling daily (148 daily) and AILs during the peak construction phase.	The assessment presented in Annex H of **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]** demonstrates adequate carriageway width or frequency of passing place opportunity to pass at least an HGV and a light vehicle as requested in comments provided by Wiltshire Council in its response (August 2025) to the Transport Assessment Scoping Note and confirmed in RR4934 Paragraph 4 of 'Appendix A - Highways and Transport Document Review - Detailed Comments'. This confirms that no passing bay or widening improvements are needed to accommodate these movements on the construction route outside of the Order Limits. The distances between passing points outside of the Order Limits are all within 150 m with forward visibility extending to the next passing point and beyond. This is within the generally accepted distance of 200 metres. As set out in the **OCTMP [APP-287]**, a booking system will be set up to manage arrivals and departures to the Order Limits. This will be implemented in coordination with banksmen, which will be able to hold back any cross-over, should there be any delays on the roads. This will prevent HGVs generated by the Scheme passing each other in opposite directions on the local roads forming part of the construction routes and will be confirmed as part of the final CTMP.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Regarding routes through the Hulavington area, excessive widening of existing rural routes to allow two HGVs to pass would be over engineering, because of the following reasons: • temporary nature of the construction period; • trip generation of 76 HGVs on the route to Lime Down D is an estimate of the deliveries on a peak day, so does not represent a daily average; • trip generation of 76 HGVs on the route to Lime Down D is based on the worst-case assumptions, including but not limited to, all phases and Solar PV Sites being constructed simultaneously and a 50% uplift; • average number of HGV construction movements along the route to Lime Down D is only 50 per day/7 per hour/one every 8 minutes (less than the journey time along the route); • assuming a realistic construction programme, the average number of HGV construction movements along the route to Lime Down D is only 32 per day/5 per hour/one every 13 minutes (less than the journey time along the route); • delivery times during the construction phase are limited to those times set out in the **OCTMP [APP-287]**. There will be no HGV construction trips outside of these hours; • there would be a much greater impact on hedgerow, trees and character; and • low level of existing HGVs on the route to Lime Down D (average number of existing HGV movements is only 46 per day, with some of these movements occurring outside of proposed construction hours set out in the **OCTMP [APP-287]**).

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Regarding routes through the Foss Way area, excessive widening of existing rural routes to allow two HGVs to pass would be over engineering, because of the following reasons: • temporary nature of the construction period; • trip generation of 16 HGVs on the route to Lime Down A is an estimate of the deliveries on a peak day, so does not represent a daily average; • trip generation of 16 HGVs on the route to Lime Down A is based on the worst-case assumptions, including but not limited to, all phases and Solar PV Sites being constructed simultaneously and a 50% uplift; • average number of HGV movements along the route to Lime Down A is only 10 per day/less than 2 per hour/one every 42 minutes (less than the journey time along the route), with the construction phase for Lime Down Site A only lasting 9 months • delivery times during the construction phase are limited to those times set out in the **oCTMP [APP-287].** There will be no HGV trips outside of these hours; • impact on hedgerow, trees and character; and • low level of existing HGVs on the route to Lime Down A (average number of existing HGV movements is only 40 per day, with some of these movements occurring outside of proposed construction hours set out in the **oCTMP [APP-287]**). Regarding routes through the Alderton area, excessive widening of existing rural routes to allow two HGVs to pass would be over engineering, because of the following reasons: • temporary nature of the construction period;

Reference	Theme	Comments/Issues Raised	Applicant's Response
			• trip generation of 50 HGVs on the route to Lime Down A-C is an estimate of the deliveries on a peak day, so does not represent a daily average; • trip generation of 50 HGVs on the route to Lime Down A-C is based on the worst-case assumptions, including but not limited to, all phases and Solar PV Sites being constructed simultaneously and a 50% uplift; • average number of HGV construction movements along the Route to Lime Down A-C route is only 32 per day/7 per hour/one every 8 minutes (less than the journey time along the route); • assuming a realistic construction programme, the average number of HGV construction movements along the route to Lime Down A-C is only 17 per day/less than 3 per hour/one every 25 minutes (less than the journey time along the route); • delivery times during the construction phase are limited to those times set out in the **oCTMP [APP-287]**. There will be no HGV trips outside of these hours; • impact on hedgerow, trees and character; and • low level of existing HGVs on the route to Lime Down A-C (average number of existing HGV movements is only 20 per day, with some of these movements occurring outside of proposed construction hours set out in the **oCTMP [APP-287]**. Further detail of trip generation has also been added to **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]** which will be submitted at Deadline 1 of Examination. To provide further comfort, additional information has been added to **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]** which will be submitted at Deadline 1 of Examination. This demonstrates that there is adequate

Reference	Theme	Comments/Issues Raised	Applicant's Response
			carriageway width and/or passing place opportunity for two HGVs.
TPC-010	Transport and Access	Being so close to the Lime Down site and sited next to the M4 at Junction 18 and the A46, Tormarton Parish council is very concerned regarding the increased levels of traffic during the 2-year construction phase. It is reasonable to suggest that a large percentage of traffic will be from Junction 18 of the M4 – HGVs, buses (for staff) and private vehicles.	The impact on Driver delay is negligible as shown in Table 13-24 of **ES Volume 1, Chapter 13-1: Transport and Access [APP-065]**
TPC-011	Transport and Access	We note that it is proposed that traffic to the site is routed from Junction 18 to the Old Sodbury crossroad and onto Acton Turville, Burton, Littleton Drew, etc. Tormarton is a small village and is already used by large numbers of commuters to 'park & share' on our narrow road verges, passing places and anywhere there is space! Cars are often parked dangerously. As well as verges, cars are parked in the village as well, causing parking and speeding issues to residents.	The construction traffic routes are assessed within **ES Volume 1, Chapter 13: Transport and Access [APP-065]**, this includes highway links routing through Acton Turville and Burton. The assessment concludes that there is no significant impact on these links. Construction traffic will not route through Tormarton.
TPC-012	Transport and Access	The Tormarton to Acton Turville Road (Acton Turville Road) is a long straight rural road and is used as a shortcut to Acton Turville, rather than the Old Sodbury route. VAR speed signs show the large majority of road users exceed the speed limit of 40mph. It is totally unsuitable for large vehicles, buses, etc. and particularly unsuitable for HGVs. Already, multiple accidents have	The impact of the Scheme on driver delay and road safety is negligible as shown in **ES Volume 1, Chapter 13-1: Transport and Access [APP-065].** The Tormarton to Acton Turville Road (Acton Turville Road) does not form part of the general construction routes. Instead, the specified construction route is to/from the A46 via the B4040 and B4039**.**

Reference	Theme	Comments/Issues Raised	Applicant's Response
		taken place on this road within the village area and a new Casualty Reduction Scheme has been implemented at the Tormarton crossroads in a bid to make the road safer. The Cotswolds Way (used by thousands of walkers each year) crosses the Acton Turville Road and a large increase in traffic will increase the risk to pedestrians.	
TPC-013	Other Environmental Matters	In addition to the concerns outlined above, there is concern regarding potential BESS fires and contamination.	The Battery Energy Storage System (BESS) containers proposed for the Scheme will incorporate built-in safety features for fire avoidance, detection and suppression. The Scheme layout also incorporates separation distances between battery containers to ensure that any isolated fire would not become widespread or lead to a major incident. As shown on **ES Volume 2, Figure 3-1: Indicative Site Layout Plan [APP-081],** the battery containers will be located more than 200m from the nearest Public Right of Way and more than 500m from any residential receptors. The Applicant notes that the approach to BESS safety is under discussion with Dorset and Wiltshire Fire and Rescue Service (D&WFRS) and is set out in the relevant Statement of Common Ground to be submitted at Deadline 1. An **Outline Battery Safety Management Plan (OBSMP) [APP-286]** has been prepared for the Scheme using guidance from Dorset and Wiltshire Fire and Rescue Service and incorporating recommendations of the National Fire Chiefs Council. The OBSMP ensures that risks associated with battery storage are appropriately mitigated. The OBSMP will be amended at Deadline 1 to fully accommodate the latest BESS safety requirements contained in NFPA 855 (2026) ensuring that any credible risks associated with battery storage are either

Reference	Theme	Comments/Issues Raised	Applicant's Response
			prevented or fully mitigated if a BESS failure occurs. Section 5.4 of the **OBSMP [APP-286]** specifies the typical emergency response protocols, procedures and safety information that will be included in ERPs. ERPs will be drafted and approved for all stages of the Scheme, including construction, operation, and decommissioning. The Applicant has followed National Fire Chiefs Council (NFCC) guidance and commissioned a Plume Assessment Study to model toxic gas emissions and visibility impacts from a BESS fire on all sensitive receptors within a 1km radius of the BESS area. The fire emissions modelled in the report were based upon recent UK Health Security Agency (UKHSA) requests for DCO BESS projects which explore both immediate air quality impacts together with annual UK air quality requirements. Six worst case BESS fire locations (i.e. locations within the BESS Area closest to sensitive receptors) have been modelled as depicted in **ES Volume 2, Figure 15-5: Battery Energy Storage System Fire Emissions Study Area [APP-166].** The Concentrations of carbon monoxide (CO), formaldehyde, hydrogen chloride (HCl), hydrogen cyanide (HCN), hydrogen fluoride (HF), ammonia (NH_3), nitrogen dioxide (NO2) and particulates from a potential BESS fire have been modelled using an air quality dispersion model to determine the likely effects on human health. A high-level visibility assessment has also been undertaken using the modelled particulates results to determine the effect of BESS fire emissions on visibility on the local road and rail network to inform the **Outline Battery Safety Management Plan (OBSMP) [APP-286].** The Plume Assessment Study has concluded that there are no

Reference	Theme	Comments/Issues Raised	Applicant's Response
			significant toxic emission or visibility impacts at all sensitive receptor locations. The Applicant has also committed to commissioning an additional Plume Analysis Study at the detailed design stage as stipulated in Section 5.5.9 of the **OBSMP [APP-286]** and secured through Requirement 6 of the **Draft DCO [APP-016].** The Draft DCO also requires the relevant planning authority to consult with Dorset and Wiltshire Fire and Rescue Service and the Environment Agency before determining the application, and that the Battery Safety Management Plan must be implemented as approved. As now mandated under NFPA 855 (2026), the Applicant will only be able to select a BESS system that has undertaken Large Scale Fire Testing (LSFT). At the detailed design stage, the selected BESS LSFT data will be leveraged to fully inform inputs for risk assessment tools which will be utilised together with detailed consequence modelling to provide a comprehensive site operations and emergency response safety audit, this is stipulated in the OBSMP (Section 6.1.1) pre-construction requirements. Section 5 of the **OBSMP [APP-286]** covers all requisite firefighting requirements for the Scheme including fire service access, firefighting water supply, and emergency planning requirements. Potential effects of the Scheme on water quality and contamination risk are addressed **in ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [APP-063],** which sets out mitigation and management measures to protect water quality during construction and operation. These measures include pollution prevention controls, containment systems, emergency response protocols, and site-specific drainage measures, particularly around the Battery Energy Storage

Reference	Theme	Comments/Issues Raised	Applicant's Response
			System (BESS) and substations where lined drainage and automatically actuating valves are proposed. The Applicant notes that the approach to pollution resulting from battery fire is under discussion with both the Environment Agency and the Lead Local Flood Authority (LLFA) and is set out in the relevant Statement of Common Ground to be submitted at Deadline 1. Mitigation measures to control contamination risk during construction are set out in the **Outline CEMP [APP-277].** Routine maintenance and panel cleaning will use minimal water and no detergents or chemical cleaning agents, in line with industry standards and best practice, so there is no expected risk from cleaning runoff. In addition, the removal of agrichemical inputs through the cessation of farming activities will further reduce contamination risks compared to existing use. The preparation, approval and implementation of a detailed CEMP substantially in accordance with the **Outline CEMP [APP-277]** is secured through Requirement 13 in Schedule 2 of **the Draft DCO [APP-016]**, ensuring that construction works are carried out in accordance with the approved CEMP and that contamination risks are appropriately managed throughout construction of the Scheme.
TPC-014	Description and DCO Process	We believe the Lime Down site is in a totally inappropriate location for such a large solar site, with the additional cable route corridor to Melksham. We hope you will give serious consideration to the concerns we have raised.	As to size, the Scheme has been designed to deliver the greatest possible benefit from the available land and the available grid connection, whilst avoiding, minimising and/or mitigating harmful environmental effects. Regarding the distance between the Solar PV Sites and the point of connection at Melksham, the Applicant confirms that the existing National Grid Melksham substation has been identified as the point of connection. This decision was based on available

Reference	Theme	Comments/Issues Raised	Applicant's Response
			capacity, network resilience, and strategic grid planning. As explained in **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]**, an initial search area was identified at a 5 km radius from the POC, however this was later expanded as no suitable and available sites within 5 km were identified. The search area was enlarged incrementally to a 20 km radius which is considered by the Applicant to be a viable cable connection distance for a solar project of this scale. The POC and 20 km search area is shown on Figure 1, Annex C of **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185].** Further, from an operational perspective, high voltage electricity transmission at 400kV in this case, is specifically designed to minimise energy losses over long distances. As such, the approximate 20km distance involved results in negligible losses. More details on how the Cable Route Corridor has been located and designed can be found in **ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP-056]**. Several factors were considered such as taking as direct a route as possible, whilst following existing features, such as roads; and avoiding sensitive receptors as far as practicable, such as habitat designations, residential and commercial properties, heritage assets, and a large number of land interests. The assessments set out in the various chapters of the **ES [APP-052 to APP-265]** detail what impacts are expected as a result of the Scheme based on the minimum and maximum parameters of the Scheme, and the mitigation and enhancement measures that are proposed to reduce these impacts.

5.18 Dauntsey Parish Council

Table 5-18 RR-0979

Reference	Theme	Comments/Issues Raised	Applicant's Response
DPC-001	Description and DCO Process	The Parish Council will be submitting a comprehensive letter of objections to this proposal. These will include the overall size and scale of the project. The significant negative impact on the rural scene and landscapes, the surrounding village settings, ecology and biodiversity, hydrology, flood risk and drainage, soils and agriculture, noise and vibration, cultural heritage, transport, highways and socio-economics, tourism and recreation all to be balanced against the potential gains of renewable energy generation and carbon reduction. In addition the concentration of solar farms, battery storage and associated infrastructure within the County of Wiltshire that represents a significant cumulative impact and industrialisation of the countryside destroying food production and the farming industry	The Applicant notes the Council's intention to submit a detailed letter of objections covering a range of topics including landscape and visual effects, setting, ecology and biodiversity, hydrology and flood risk and drainage, soils and agriculture, noise and vibration, cultural heritage, transport, socio-economics, tourism and recreation, as well as concerns relating to cumulative development and the scale of the Scheme. The Applicant confirms that these matters have been assessed as part of the Environmental Impact Assessment (EIA) and are reported within the Environmental Statement (ES), including **ES Volume 1, Chapter 8: Landscape and Visual [APP-060], ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061], ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [APP-063], ES Volume 1, Chapter 14: Noise and Vibration [APP-066], ES Volume 1, Chapter 12: Cultural Heritage [APP-064], ES Volume 1, Chapter 13: Transport and Access [APP-065], ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** and **ES Volume 1, Chapter 21: Cumulative and In-Combination Effects [APP-073].** The Applicant's **Statement of Need [APP-266]** provides evidence that an unprecedented capacity of new low-carbon generation schemes is urgently needed for the UK to meet its legally binding climate change targets. The government has confirmed that solar energy is at the heart of the Clean Power 2030 Mission [NPS EN-3 (2025) Paras 2.10.1 & 2.10.2]. The Statement of Need confirms that the need for the Scheme is urgent and that substantial weight should be given to the need for the Scheme [NPS EN-1 (2023) Para 3.2.9-3.2.10]. The Applicant is confident that the proposed management and mitigation measures set out in the **Environmental Statement [APP-052 to APP-265]** are comprehensive

Reference	Theme	Comments/Issues Raised	Applicant's Response
			and robust and that the Scheme aligns with national and local planning policy; this is outlined in the **Planning Statement [APP-267]**. Of particular relevance are Annex A: National Policy Statement Accordance Tables and Annex B: Local Policy Accordance Tables, of the Planning Statement which set out an appraisal of the Scheme against national and local planning policies. The Applicant recognises that the Council intends to provide further detailed submissions on these matters. The Applicant will continue to engage constructively with stakeholders throughout the Examination and will respond to issues raised through the formal Examination process.

5.19 Seagrey Parish Council

Table 5-19 RR-4303

Reference	Theme	Comments/Issues Raised	Applicant's Response
SGPC-001	Description and DCO Process	The Parish Council will be submitting a comprehensive letter of objections to this proposal. These will include the overall size and scale of the project. The significant negative impact on the rural scene and landscapes, the surrounding village settings, ecology and biodiversity, hydrology, flood risk and drainage, soils and agriculture, noise and vibration, cultural heritage, transport, highways and socio-economics, tourism and recreation all to be balanced against the potential gains of renewable energy generation and carbon reduction. In addition the concentration of solar farms, battery storage and associated infrastructure within the County of Wiltshire that represents a significant cumulative impact and industrialisation of the countryside destroying food production and the farming industry	The Applicant notes the Council's intention to submit a detailed letter of objections covering a range of topics including landscape and visual effects, setting, ecology and biodiversity, hydrology and flood risk and drainage, soils and agriculture, noise and vibration, cultural heritage, transport, socio-economics, tourism and recreation, as well as concerns relating to cumulative development and the scale of the Scheme. The Applicant confirms that these matters have been assessed as part of the Environmental Impact Assessment (EIA) and are reported within the Environmental Statement (ES), including **ES Volume 1, Chapter 8: Landscape and Visual [APP-060], ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061], ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [APP-063], ES Volume 1, Chapter 14: Noise and Vibration [APP-066], ES Volume 1, Chapter 12: Cultural Heritage [APP-064], ES Volume 1, Chapter 13: Transport and Access [APP-065], ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** and **ES Volume 1, Chapter 21: Cumulative and In-Combination Effects [APP-073].** The Applicant's **Statement of Need [APP-266]** provides evidence that an unprecedented capacity of new low-carbon generation schemes is urgently needed for the UK to meet its legally binding climate change targets. The government has confirmed that solar energy is at the heart of the Clean Power 2030 Mission [NPS EN-3 (2025) Paras 2.10.1 & 2.10.2]. The Statement of Need confirms that the need for the Scheme is urgent and that substantial weight should be given to the need for the Scheme [NPS EN-1 (2023) Para 3.2.9-3.2.10]. The Applicant is confident that the proposed management and mitigation measures set out in the **Environmental Statement [APP-052 to APP-265]** are comprehensive

Reference	Theme	Comments/Issues Raised	Applicant's Response
			and robust and that the Scheme aligns with national and local planning policy; this is outlined in the **Planning Statement [APP-267]**. Of particular relevance are Annex A: National Policy Statement Accordance Tables and Annex B: Local Policy Accordance Tables, of the Planning Statement which set out an appraisal of the Scheme against national and local planning policies. The Applicant recognises that the Council intends to provide further detailed submissions on these matters. The Applicant will continue to engage constructively with stakeholders throughout the Examination and will respond to issues raised through the formal Examination process.

5.20 Sopworth Parish Meeting

Table 5-20 RR-4429

Reference	Theme	Comments/Issues Raised	Applicant's Response
SPM-001	Description and DCO Process	I write on behalf of Sopworth Parish Meeting, in order to strongly object to the proposals, for the following reasons; Sopworth is a small hamlet located some 3 miles from the proposals. Whilst we do not have an in principle objection to the use of Solar as a source of renewable energy, we feel that Brownfield sites should be developed, and not agricultural land. Our way of life will be adversely affected for a number of reasons, including; Significant disruption to access to and from the M4 Motorway will be caused both during and after the construction phase.	An assessment of transport and access effects during the construction, operation and maintenance, and decommissioning of the Scheme is presented in **ES Volume 1, Chapter 13: Transport and Access [APP-065]**. This concludes there would be no significant transport and access impacts as a result of the Scheme. The alternatives explored by the Applicant, including consideration of Brownfield Sites, is set out in **ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP-056] and ES Volume 3, Appendix 4 1: Site Selection Assessment Report [APP 185].** As set out in the Site Selection Assessment Report, Brownfield Sites were considered, but no brownfield land was identified which would be of an adequate area to facilitate a large solar project, either individually or in combination with other sites. More details on how the Cable Route Corridor has been located and designed can be found in **ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP-056]**. Several factors were considered such as taking as direct a route as possible, whilst following existing features, such as roads; and avoiding sensitive receptors as far as practicable, such as habitat designations, residential and commercial properties, heritage assets, and a large number of land interests.
SPM-002	Socio-Economics, Tourism and Recreation	Negative effect on Tourism	The potential effects of the Scheme on tourism and recreation are assessed in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]**, supported by **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]**. The assessment considers baseline tourism activity, visitor attractions, recreational assets and tourism-dependent businesses within the study area.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			The assessment evaluates potential effects on the use, enjoyment and desirability of nearby tourism destinations, including impacts on individual visitor attractions, recreational routes, events and businesses reliant on tourism. It also considers whether changes to landscape character or visual amenity could influence visitor behaviour. The assessment identifies a worst-case scenario in which a temporary loss of up to 50 tourism-related jobs could occur locally during construction, and a long-term loss of up to 11 tourism-related jobs could occur during the operational phase of the Scheme. This represents a precautionary estimate based on conservative assumptions. The assessment concludes that, while some localised effects on tourism receptors are anticipated to occur, significant adverse effects on the wider tourism economy are not anticipated. These findings are fully reported in the ES and will be weighed in the planning balance alongside the Scheme's wider economic and environmental benefits. The Applicant notes that the approach to assessment of tourism impacts is under discussion with Wiltshire Council's Economic and Regeneration Team and is set out in the relevant Statement of Common Ground to be submitted at Deadline 1.
SPM-003	Hydrology, Flood Risk and Drainage	Flood risk and Groundwater contamination.	Potential effects of the Scheme on flood risk, including fluvial, surface water and groundwater sources, are assessed in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [APP-063]**, with supporting detail provided in **ES Volume 3, Appendix 11-1 to 11-9: Flood Risk Assessment and Drainage Strategy [APP-210 to APP-218]**.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			The assessment considers flood risk within the Order Limits and to surrounding receptors. It concludes that the Scheme would not increase flood risk elsewhere and would remain safe and operable for its lifetime, having regard to embedded design measures, greenfield runoff control, exceedance management and floodplain considerations where relevant. Potential effects of the Scheme on water quality and contamination risk are also addressed in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [APP-063]**, which sets out mitigation and management measures to protect water quality during construction and operation. These include pollution prevention controls, containment systems, emergency response protocols and site-specific drainage measures, particularly around the BESS and substations where lined and isolatable drainage systems with automatically actuating valves are proposed. The Applicant notes that the approach to pollution resulting from a battery fire is under discussion with the Environment Agency and the Lead Local Flood Authority and is set out in the relevant Statement of Common Ground to be submitted at Deadline 1. Mitigation measures to control contamination risk during construction are set out in the **Outline Construction Environmental Management Plan [APP-277]**. Routine maintenance and panel cleaning will use minimal water and no detergents or chemical cleaning agents. The cessation of agricultural activities will remove existing agrichemical inputs and therefore reduce baseline contamination pressures. The preparation, approval and implementation of a detailed CEMP substantially in accordance with the **Outline Construction Environmental Management Plan [APP-277]**

Reference	Theme	Comments/Issues Raised	Applicant's Response
			is secured through Requirement 13 in Schedule 2 to the **Draft Development Consent Order [APP-016]**, ensuring that construction works are carried out in accordance with the approved CEMP and that both flood risk and contamination risks are appropriately managed throughout construction.
SPM-004	Other Environmental Matters	Light and noise polution.	Potential effects relating to lighting are considered within the LVIA in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**, which considers the implications of construction, operational and decommissioning lighting on landscape and visual receptors. No significant effects of lighting, above those recorded for landscape and visual receptors, were recorded. The Landscape and Visual Impact Assessment (LVIA) has considered the construction, operational and decommissioning lighting proposals for the Scheme, with details of lighting design, directionality and intermittent lighting set out in **ES Volume 1, Chapter 3: The Scheme [APP-055]**. The Scheme has been designed to minimise the need for external lighting. Lighting is not required within the Solar PV Arrays during the operational phase. Motion-sensing security lighting will be provided within substations and the BESS Area and will be used only for maintenance and security purposes. Temporary site lighting during construction and decommissioning will be required to enable safe working during hours of darkness. This lighting will be designed, as far as reasonably practicable, to minimise light spill outside the Site and Cable Route Corridor, particularly towards residential properties, highways and ecological receptors. Standard good practice measures will be employed to minimise glare and light spill during construction, operation and decommissioning. There will be no lighting on perimeter fencing.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			The mitigation measures to control construction lighting stated above are secured within the **Outline Construction Environmental Management Plan [APP-277]**, and operational lighting controls (also referenced above) form part of the **Outline Operational Environmental Management Plan [APP-278]**. The preparation, approval and implementation of detailed management plans, substantially in accordance with these outline plans, are secured through requirements in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring lighting impacts are appropriately controlled throughout the lifetime of the Scheme. An assessment of the effects of the Scheme on noise and vibration is provided in **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**, with supporting technical information supplied in **ES Volume 3, Appendix 14-4: Noise Modelling [APP-237]**. The assessment considers potential noise and vibration impacts during construction, operation and decommissioning, including from solar PV panels and associated infrastructure. The conclusions of the assessment in relation to each phase of the Scheme are set out below. The conclusions of the assessments are made for the Scheme as a whole (i.e. all of its components combined, including the BESS), and therefore any specific component will not have any greater effects than those that have been assessed. The Applicant notes that the approach to noise and vibration has been discussed with Wiltshire Council, as described in Section 14.2 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**. In addition, further meetings have been held over the approach to the management plans, and a Statement of Common Ground will be issued and updated throughout examination

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Construction phase The noise and vibration impacts arising from construction activities are assessed in Section 14.10 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**. For the purposes of the assessment, a reasonable worst-case scenario assuming piling activities has been considered. Mitigation measures associated with construction activity, such as temporary screens and advanced warning of works, are presented in Section 14.9 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]** and are committed to through the **Outline Construction Environmental Management Plan [APP-277]**. With these measures in place, the assessment concludes that no significant effects from construction noise or vibration are expected. A noise monitoring programme agreed with Wiltshire Council will be carried out during construction, as committed to in the **Outline Construction Environmental Management Plan [APP-277]**. The preparation, approval and implementation of the Construction Environmental Management Plan, substantially in accordance with the **Outline CEMP [APP-277]**, is secured through Requirement 13 in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that construction noise and vibration effects are appropriately controlled. Operational phase The noise impacts from the operation of the Scheme and its components are assessed in Section 14.10 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**, with supporting modelling provided in **ES Volume 3, Appendix 14-4: Noise Modelling [APP-237]**. The predicted noise levels from the Solar PV Sites have been artificially increased by 3 dB to

Reference	Theme	Comments/Issues Raised	Applicant's Response
			account for the increased likelihood that the noise from the Scheme would be perceived as distinct from the existing background sound. Potential mitigation measures are detailed in Section 14.9 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**, and with such measures in place, significant effects from operational noise are not expected. The **Outline Operational Environmental Management Plan [APP-278]** commits to noise levels from the Scheme at residential dwellings being the same as or below those modelled in the ES. This provides assurance that significant effects from operational noise will be avoided, while allowing flexibility in how this is achieved. The preparation, approval and implementation of the detailed OEMP, substantially in accordance with the outline plan, are secured through Requirement 14 of Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring operational noise is appropriately controlled throughout the lifetime of the Scheme.
SPM-005	Other Environmental Matters	Risk of fire from Battery Storage System.	The BESS containers proposed for the Scheme will incorporate built-in safety features for fire avoidance, detection and suppression. The Scheme layout also incorporates separation distances between battery containers to ensure that any isolated fire would not become widespread or lead to a major incident. As shown on **ES Volume 2, Figure 3-1: Indicative Site Layout Plan [APP-081],** the battery containers will be located more than 200 metres from the nearest Public Right of Way and 500 m from the nearest dwelling from any residential receptors. The Applicant notes that the approach to BESS safety is under discussion with Dorset and Wiltshire Fire and Rescue Service (D&WFRS) and is set out in the relevant Statement of Common Ground to be submitted at Deadline 1.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			An **Outline Battery Safety Management Plan (OBSMP) [APP-286]** has been prepared for the Scheme using guidance from Dorset and Wiltshire Fire and Rescue Service and incorporating recommendations of the National Fire Chiefs Council. The safety objectives for the design of the BESS site are listed in Section 2.4 of the OBSMP. The OBSMP will be amended at Deadline 1 to fully accommodate the latest BESS safety requirements contained in NFPA 855 (2026) ensuring that any credible risks associated with battery storage are either prevented or fully mitigated if a BESS failure occurs. Section 5.4 of the **OBSMP [APP-286]** specifies the typical emergency response protocols, procedures and safety information that will be included in ERPs. ERPs will be drafted and approved for all stages of the Scheme, including construction, operation and decommissioning. The Applicant has followed National Fire Chiefs Council (NFCC) guidance and commissioned a Plume Assessment Study to model toxic gas emissions and visibility impacts from a BESS fire on all sensitive receptors within a 1km radius of the BESS area. The fire emissions modelled in the report were based upon recent UK Health Security Agency (UKHSA) requests for DCO BESS projects which explore both immediate air quality impacts together with annual UK air quality requirements. Six worst case BESS fire locations (i.e. locations within the BESS Area closest to sensitive receptors) have been modelled as depicted in **ES Volume 2, Figure 15-5: Battery Energy Storage System Fire Emissions Study Area [APP-166]**. The Concentrations of carbon monoxide (CO), formaldehyde, hydrogen chloride (HCl), hydrogen cyanide (HCN), hydrogen fluoride (HF), ammonia (NH_3), nitrogen dioxide (NO2) and

Reference	Theme	Comments/Issues Raised	Applicant's Response
			particulates from a potential BESS fire have been modelled using an air quality dispersion model to determine the likely effects on human health. A high-level visibility assessment has also been undertaken using the modelled particulates results to determine the effect of BESS fire emissions on visibility on the local road and rail network to inform the **OBSMP [APP-286].** The Plume Assessment Study has concluded that there are no significant toxic emission or visibility impacts at all sensitive receptor locations. The Applicant has also committed to commissioning an additional Plume Analysis Study at the detailed design stage as stipulated in Section 5.5.9 of the **OBSMP [APP-286]** and secured through Requirement 6 of the **Draft DCO [APP-016].** As now mandated under NFPA 855 (2026) the Applicant will only be able to select a BESS system that has undertaken Large Scale Fire Testing (LSFT). At the detailed design stage, the selected BESS LSFT data will be leveraged to fully inform inputs for risk assessment tools which will be utilised together with detailed consequence modelling to provide a comprehensive site operations and emergency response safety audit, this is stipulated in the **OBSMP [APP-286]** (Section 6.1.1) pre-construction requirements. Section 5 of the OBSMP covers all requisite firefighting requirements for the Scheme including fire service access, firefighting water supply, and emergency planning requirements. The **OBSMP [APP-286]** is secured through Requirement 6 (Battery safety management) in Schedule 2 of the **Draft DCO**

Reference	Theme	Comments/Issues Raised	Applicant's Response
			[APP-016], which provides that Work No. 2 must not commence until a Battery Safety Management Plan has been submitted to and approved by the relevant planning authority. The approved plan must be substantially in accordance with the Outline Battery Safety Management Plan. The Draft DCO also requires the relevant planning authority to consult with Dorset and Wiltshire Fire and Rescue Service and the Environment Agency before determining the application, and that the Battery Safety Management Plan must be implemented as approved.
SPM-006	Landscape and Visual	Massively negative visual impact.	An assessment of landscape and visual effects are presented in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**. The Landscape and Visual Impact Assessment (LVIA) assesses effects on identified landscape and visual receptors, including residential properties, users of public rights of way and roads, and identifies where significant effects may occur. The LVIA found no significant long term visual effects to residential properties as a consequence of the Scheme. The visual effects of the Scheme are summarised in **ES Volume 3, Appendix 8-3-3 [APP-192]**. Temporary Major/Moderate and Moderate Adverse effects on visual receptors have been recorded across the Scheme during construction and at Year 1. However, for the majority of these receptors, the effects reduce to non –significant levels as a result of the embedded mitigation measures which are set out in Section 8.9 of **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]** and include landscape buffers, retention of existing hedgerows and woodland, and new planting to provide screening and integration over time. The assessment also identifies that there would be some long-term significant effects on the visual amenity of users of some localised footpaths, as a result of the Scheme. This predominantly relates to locations where footpaths diagonally cross fields and mitigation planting would be inappropriate to

Reference	Theme	Comments/Issues Raised	Applicant's Response
			landscape character and the legacy landscape. Those receptors which would experience Significant Long Term Visual Effects are listed in Table 8-30 of the **LVIA [APP-060].** The scale of development within the Order Limits has been significantly reduced from the layout assessed in the Preliminary Environmental Information Report (PEIR) through an iterative design process undertaken in response to consultation and in accordance with the mitigation hierarchy to avoid, reduce and mitigate adverse effects. As part of this design evolution, panels along the edge of the Cotswolds National Landscape and along the Fosse Way have been removed. Mitigation measures to address landscape and visual effects are set out in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**, **Figure 3-4-1 to 3-4-5.2 Landscape and Ecology Mitigation Plan [APP-084]** and secured within the **Outline Landscape and Ecological Mitigation Plan (LEMP) [APP-283]** and the **Outline Ecological Protection and Mitigation Strategy (EPMS) [APP-284]**. These documents include proposals for new and enhanced planting, retention of existing hedgerows and woodland, and landscape integration measures to reduce visual effects over time. In addition, the Scheme design incorporates minimum offsets from existing landscape features, including residential properties, ancient woodland, woodland, hedgerows, public rights of way and watercourses, to further limit visual impacts. Although these measures reduce the effects of the Scheme on nearly all receptors, as noted above there are 10 receptors which would experience Significant Visual Effects for the duration of the Scheme as set out Table 8-30 of the **LVIA [APP-060]**.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Mitigation measures to address landscape and visual effects are set out in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**, **Figure 3-4-1 to 3-4-5.2 Landscape and Ecology Mitigation Plan [APP-084]**. The preparation, approval and implementation of detailed landscape and ecological management plans, substantially in accordance with the **OLEMP [APP-283]** and **EPMS [APP-284]**, are secured through requirements in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that the identified mitigation measures are delivered and maintained throughout the lifetime of the Scheme.
SPM-007	Cultural Heritage	Destruction of Heritage and Historic landscape.	The Applicant notes the comment. **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, supported by detailed technical appendices in **ES Volume 3, Appendices 12-1 to 12-7 [APP-219 to APP-231]** has assessed the potential impact of the Scheme on identified archaeological and built heritage assets. There is the potential for construction groundworks to cause physical damage to archaeological and built heritage assets as well as indirect impacts to the setting of built heritage assets. Where required appropriate mitigation is proposed. Embedded mitigation measures to avoid or reduce harm to heritage assets are set out in Section 12.9 of **ES Volume 1, Chapter 12: Cultural Heritage [APP-064],** with additional mitigation detailed in Section 12.11. An overarching archaeological mitigation strategy is provided in **ES Volume 3, Appendix 12-6: Outline Archaeological Mitigation Strategy [APP-230].**
SPM-008	Ecology and Biodiversity	Biodiversity loss.	Potential impacts of the Scheme on ecology and biodiversity are assessed in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**, which considers baseline conditions and evaluates likely effects during construction, operation and decommissioning. The assessment identifies embedded and

Reference	Theme	Comments/Issues Raised	Applicant's Response
			additional mitigation measures and concludes that, with these measures in place, no unacceptable significant adverse effects on ecology and biodiversity are anticipated.
SPM-009	Decommissioning and Construction	Immeasurable disruption from works associated with connection to the grid.	The construction of the cable route has been assessed throughout the **ES [APP-052 to APP-265]**, which considers the likely significant construction effects associated with these works. The **ES [APP-052 to APP-265]** assesses the cable route within defined parameters, including limits on working width and trench dimensions, to ensure that a reasonable worst-case scenario is assessed. The detailed design and construction of the cable route would be undertaken within the parameters assessed and authorised by the DCO. Measures to manage and minimise construction effects, including reinstatement of land following installation, are set out in the **Outline Construction Environmental Management Plan (CEMP) [APP-277].** **Requirement 13 in Schedule 2 to the Draft DCO [APP-016]** secures that part of the authorised development can commence until, a CEMP is submitted to and approved by the relevant planning authority. The CEMP must be substantially in accordance with the Outline CEMP, and all construction works associated must be carried out in accordance with the approved CEMP.
SPM-010	Socio-Economics, Tourism and Recreation	Negative impact on local house prices.	Impacts of the Scheme on property prices have not been assessed as these have been agreed by the Planning Inspectorate to be scoped out of assessment in the ES, as set out in **ES Volume 3, Appendix 1-2: Scoping Opinion Response Table [APP-181].**

5.21 Yatton Keynell Parish Council

Table 5-21 RR-4941

Reference	Theme	Comments/Issues Raised	Applicant's Response
YKPC-001	Transport and Access	In appropriate access routes for construction traffic In appropriate access routes for construction workers Transport Plan unenforceable and not realistic	Measures committed to and secured through the **OCTMP [APP-287]** to manage construction workers trips include: • a construction worker travel plan: • Shuttle Bus - The location where staff will travel from is unknown at this stage as it will depend on the appointed contractor. However, it is envisaged that the majority of non-local workforce will stay at local accommodation and be transported to the Order Limits by shuttle bus to minimise the impact on the strategic and local highway network; • Car sharing – A car sharing scheme will be set up. This will match construction workers who live in a similar area, or who follow a similar route to the Order Limits and encourage them to car share to save costs and reduce their impact on the environment These measures are realistic and will be monitored through the Highway Authority. Construction route suitability is assessed by examining the potential effects of construction traffic on the local highway network. These effects are assessed in **ES Volume 1, Chapter 13: Transport and Access [APP-065]**, which considers construction vehicle movements, traffic volumes, road safety and effects on road users. This included the capacity of local roads and infrastructure to accommodate construction vehicles with consideration of construction traffic volumes, vehicle types, route suitability, and network performance. The assessment concludes that the level of construction traffic associated with the Scheme is unlikely to materially affect road safety on links within the Study Area, and no significant adverse effects on accident risk are anticipated. The assessment additionally concludes that with appropriate mitigation such as the CTMP in place, there would be no

Reference	Theme	Comments/Issues Raised	Applicant's Response
			significant adverse impacts on the local highway network during the construction, operation and maintenance, and decommissioning phases of the Scheme. A final CTMP would be prepared post consent and must be substantially in accordance with the **oCTMP [APP-287]** and approved by the relevant local planning authorities (in consultation with the relevant highway authorities), as secured by Requirement 15 in Schedule 2 of the **Draft DCO [APP-016]**.
YKPC-002	Soils and Agriculture	Loss of agricultural land	The effects of the Scheme on agricultural land, including Best and Most Versatile (BMV) agricultural land, are assessed in **ES Volume 1, Chapter 17: Soils and Agriculture [APP 069]**, supported by **ES Volume 3, Appendix 17 1: Agricultural Land Classification and Soil Resource Survey Report [APP 243]**. That assessment identifies that the Scheme will result in significant adverse effects on BMV agricultural land, but that this will be a temporary and reversible loss of BMV land during the operational period. All land would be reinstated and returned to agricultural use as far as practicable following decommissioning. National planning policy recognises the economic and other benefits of BMV agricultural land and encourages the use of lower quality land where possible; however, agricultural land quality is one of a number of sustainability considerations to be weighed in the planning balance. The consideration of alternative sites, including the availability and suitability of land of lower agricultural quality, is set out in **ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP 056]** and **ES Volume 3, Appendix 4 1: Site Selection Assessment Report [APP 185]**.
YKPC-003	Landscape and Visual	Loss of amenity due to industrialization of countryside	A detailed assessment of the likely significance of effects from the Scheme on the use and desirability of individual PRoW and recreational access to the countryside is included in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** and **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]**. This assessment considers the impact on individual recreational routes, including their practical use, enjoyment and desirability. The Applicant

Reference	Theme	Comments/Issues Raised	Applicant's Response
			confirms that the majority of significant adverse effects can be mitigated. However, some significant adverse effects to users of PRoW and unsurfaced roads in Lime Down E during construction cannot be mitigated further. No significant residual effects are anticipated during the operational phase of the Scheme. The assessment in **ES Volume 1, Chapter 18: Human Health [APP-070]** also considers the physical and mental health impacts of changes to recreation and countryside access under the assessment topic 'open space, leisure and play', and concludes that no significant adverse effects are anticipated at any phase of the Scheme. The Applicant confirms that existing PRoW are to be protected as far as practicable within the Scheme design, with management measures set out in the **Outline Public Rights of Way and Permissive Paths Management Plan (PROWPPMP) [APP-282]**, confirmed as embedded mitigation in Section 16.9 of **ES Chapter 16 [APP-068]**. New permissive access routes have been incorporated into the Scheme design, shown as Work No. 10 on the **Works Plan [APP-007]** and illustrated on **ES Volume 2, Figure 3-4: Landscape and Ecology Mitigation Plan [APP-084]**. These are identified as additional mitigation and enhancement measures in Section 16.11 of **ES Chapter 16 [APP-068].** The PRoW and Permissive Paths Management Plan is secured through Requirement 16 of Schedule 2 of the **Draft Development Consent Order [APP-016]**. The preparation, approval and implementation of the detailed Construction Environmental Management Plan and Construction Traffic Management Plan, substantially in accordance with the outline plans, are secured through Requirements 13 and 15 respectively in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that impacts on PRoW and recreational routes are appropriately managed during construction.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			The approach to recreation and access has been discussed with Wiltshire Council's Public Health team and is under discussion with Wiltshire Council's Countryside Access Team and is set out in the relevant Statement of Common Ground to be submitted at Deadline 1.
YKPC-004	Cumulative Effects	Cumulative impact of solar farms in North Wiltshire - South Gloustershire Damage caused to local economy as a result of reduced tourism	In terms of the Scheme, a comprehensive Cumulative and In-Combination Effects Assessment has been undertaken in accordance with Planning Inspectorate Advice Note 17 and the relevant NPS EN-1, NPS EN-3 and NPS EN-5 requirements which are set out within **ES Volume 1, Chapter 21: Cumulative and In combination Effects [APP-073]** and associated **Appendices [APP-264]**. The assessment in **ES Volume 1 Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** and the supporting **ES Volume 3 Appendix 16-2 Tourism and Recreation Receptor Tables [APP-241]** have assessed the likely impacts of the Scheme at construction, operation, peak replacement, and decommissioning on tourism and recreation receptors, including all PROWs within 2 km of the Scheme. Whilst the Scheme is anticipated to lead to some employment and economic losses to the tourism industry, these are not identified as significant adverse effects to the assessed 20 km economic Study Area.

5.22 Shipton Moyne Parish Council

Table 5-22 RR-4352

Reference	Theme	Comments/Issues Raised	Applicant's Response
SHPC-001	Decommissioning and Construction	The inadequacy of narrow local roads for the anticipated volume of construction traffic and daily workers which will affect the village. Current estimates are for 104 HGV trips, 24 bus trips, and 334 car trips PER DAY during construction, with up to 622 workers on site. The construction phase is expected to last 2 years causing major problems on the roads.	The assessment presented in Annex H of **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]** includes an analysis of accident collisions in the study area and on construction routes. **ES Volume 1, Chapter 13: Transport and Access [APP-065]** concludes that the low level of construction traffic associated with the Scheme is unlikely to materially affect road safety on the links in the Study Area, and the effects on accidents and safety from the Scheme's construction phase on all links will be temporary and negligible (not significant). This is summarised in Table 13-31 of this chapter. Annex H of **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]** , demonstrates adequate carriageway width and/or adequate frequency of passing places providing opportunity to pass at least an HGV and a light vehicle as requested in comments provided by Wiltshire Council in its response (August 2025) to the Transport Assessment Scoping Note and confirmed in RR4934 Paragraph 4 of 'Appendix A - Highways and Transport Document Review - Detailed Comments'. This confirms that no passing bay or widening improvements are needed to accommodate these movements on the construction route outside of the Order Limits. The distances between passing points outside of the Order Limits are all within 150 m with forward visibility extending to the next passing point and beyond. This is within the generally accepted distance of 200 metres, for example, the HS2 Rural Road Design Criteria stated visible passing places must be provided on single-track roads at a maximum spacing of 200 metres. In regard to construction worker car trips, these are managed through measures committed to and secured through and the **OCTMP [APP-287]** listed below. Construction worker vehicle trips through the village are likely to be negligible because of these measures**:** • a construction worker travel plan;

Reference	Theme	Comments/Issues Raised	Applicant's Response
			• Shuttle Bus - The location where staff will travel from is unknown at this stage as it will depend on the appointed contractor. However, it is envisaged that the majority of non-local workforce will stay at local accommodation and be transported to the Order Limits by shuttle bus to minimise the impact on the strategic and local highway network; • Car sharing – A car sharing scheme will be set up. This will match construction workers who live in a similar area, or who follow a similar route to the Order Limits and encourage them to car share to save costs and reduce their impact on the environment An **oCTMP [APP-287]** supports the DCO Application and presents outline measures which restrict construction deliveries to the proposed construction routes. It also includes road condition surveys to ensure any damage to the highway network caused by construction traffic is identified and rectified, management of construction deliveries to avoid the requirement for HGVs generated by the Scheme passing each other in opposite directions on the local roads, and restricted hours of deliveries outside of peak hours. With this mitigation in place, **ES Volume 1, Chapter 13-1: Transport and Access [APP-065]** concludes that impacts would be negligible to minor adverse. A final CTMP would be prepared post consent and must be substantially in accordance with the **oCTMP [APP-287]** and approved by the relevant local planning authorities (in consultation with the relevant highway authorities), as secured by Requirement 15 in Schedule 2 of the **Draft DCO [APP-016]**.
SHPC-002	Transport and Access	The main route for the traffic will be from Cirencester due to the low bridge at Corston. This will push more traffic onto our inadequate roads.	The main construction routes are assessed in Annex H of **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]** which demonstrates that the construction routes are suitable. Standard 16.5m articulated vehicles are on average 4m high

Reference	Theme	Comments/Issues Raised	Applicant's Response
			and can pass under the low bridge at Corston as it has a height restriction of 4.2m. The potential effects of construction traffic on the local highway network are assessed in **ES Volume 1, Chapter 13: Transport and Access [APP-065]**, which considers construction vehicle movements, traffic volumes, road safety and effects on road users. This included the capacity of local roads and infrastructure to accommodate construction vehicles with consideration of construction traffic volumes, vehicle types, route suitability, and network performance. The assessment concludes that the level of construction traffic associated with the Scheme is unlikely to materially affect road safety on links within the Study Area, and no significant adverse effects on accident risk are anticipated. The assessment additionally concludes that with appropriate mitigation such as the Construction Traffic Management Plan in place to manage construction vehicle movements, there would be no significant adverse impacts on the local highway network during the construction, operation maintenance, and decommissioning phases of the Scheme. An **Outline Construction Traffic Management Plan (CTMP) [APP-287]** has been prepared and submitted with the DCO application. The aim of the CTMP is to ensure that the effect of the construction phase on the local highway network is minimised. The **Outline CTMP [APP-287]** secures measures to coordinate construction deliveries by HGVs to arrive and depart between 09:30 and 16:30 where possible, to avoid peak network hours of 08:00–09:00 and 17:00–18:00. It also includes a community liaison element to keep local communities informed about the construction process and to provide a contact for feedback should any issues arise. Compliance with the CTMP will be monitored by the Developer, Contractor and Wiltshire Council as local highway authority.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			The preparation, approval and implementation of the final CTMP, substantially in accordance with the outline CTMP, are secured through Requirement 15 of Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring construction traffic impacts are appropriately managed throughout the construction phase of the Scheme.

5.23 Great Somerford Parish Council

Table 5-23 RR-1732

Reference	Theme	Comments/Issues Raised	Applicant's Response
GSPC-001	Description and DCO Process	Lime Down Solar Park response from Great Somerford Parish Council. Great Somerford Parish Council boundary adjoins Site E with water from the whole development (excluding the cable route to Melksham) discharging into the Bristol Avon from the Sherston Avon, Gausebrook and Rodbourne Brook, upstream of Great Somerford. Great Somerford Parish Council object to the application for the following reasons.	The Applicant notes Great Somerford Parish Council's objection and its concern regarding the Scheme's hydrological connectivity to the Sherston Avon, Gausebrook and Rodbourne Brook. Detailed responses to specific queries have been presented below.
GSPC-002	Hydrology, Flood Risk and Drainage	• Climate Change. Considering recent significant weather events and the increase in severe flooding within the Parish of Great Somerford there are concerns the increasing risk from this development has not been adequately addressed in the proposals submitted by the developer. The Environment Agency provided data to DEFRA to track high river levels during Storm Babet (Oct. 2023) and Storm Henk(Jan.24) for payments made by the Rural Payments Agency from the Farming Recovery Fund. Brook Farm, Great Somerford had a Land Parcel Hectarage of124.9 Has. eligible for payment. With the above concerns a Level 2 Strategic Flood Risk assessment should be provided to ensure the mitigation measures reduce the downstream flooding.	Flood risk has been assessed in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [APP-063]**, with detailed parcel-level assessment provided in **ES Volume 3, Appendix 11-8: Flood Risk Assessment and Drainage Strategy – Lime Down E2 [APP-217]** and the supporting Flood Risk Assessment suite **[APP-210 to APP-218]**. For Lime Down E2, the Site lies predominantly within Flood Zone 1. Limited areas of Flood Zones 2 and 3 are present within discrete fields (E23, E24, E26 and E27) associated with the floodplain of Gabriel's Well. The substation area remains outside mapped flood extents. Flood depths affecting panel areas are generally shallow, predominantly below 0.5 m during the 1% and 0.1% AEP events, and inundation is confined to established low-lying floodplain corridors. Floodplain storage displacement has been quantified within **Appendix 11-8 [APP-217]**. The total potential displaced volume within Lime Down E2 is calculated as 2.09 m^3. When distributed across the downstream floodplain extent, the theoretical increase in flood depth is approximately 0.000012 mm. This is considered de minimis and does not require compensatory storage.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Climate change has been assessed using the Environment Agency's current allowances for peak river flows and rainfall intensity within the hydraulic modelling and drainage design, as reported in **ES Volume 1, Chapter 11 [APP-063]**. The assessment concludes that the Scheme would not increase flood risk elsewhere and would remain safe and operable for its lifetime. Detailed drainage design and construction controls are secured through the **Draft Development Consent Order [APP-016]**.
GSPC-003	Hydrology, Flood Risk and Drainage	Hydrology, flood risk and drainage. With no evidence of existing flow rates from watercourses within the overall site, no data on ground water levels and nor details of land drainage systems there is concern that proposed mitigation measures cannot be evaluated. There is no consideration of maintenance of existing watercourses nor indications of modelling of SuDS. The recent rapid rise in flood levels in the River Avon and the Brinkworth Brook indicate that sustainable drainage schemes on recent developments in Malmesbury and Royal Wooton Bassett are not mitigating the flooding downstream. When recent floods reach the soffit of the road bridge immediately upstream of the Great Somerford measuring weir,	The Applicant does not agree that the assessment lacks evidence or that mitigation cannot be evaluated. **ES Chapter 11 Hydrology, Flood Risk and Drainage [APP-063]** has been undertaken in accordance with national and local policy and guidance, using available baseline datasets and site information appropriate to the scale and nature of the Scheme, and informed through consultation with the relevant technical consultees. The Applicant acknowledges the flooding mechanisms described at Great Somerford, including bridge capacity effects, floodplain backing up and the influence of channel condition and sedimentation on local flood levels. These are baseline catchment constraints and are not caused by the Scheme. The assessment concludes that, with the embedded mitigation measures secured, the Scheme would not result in a material increase in off-site flood risk, including to adjacent communities and downstream receptors, and that any on-site flood risk would be managed such that the Scheme remains safe and operable for its lifetime.

Reference	Theme	Comments/Issues Raised	Applicant's Response
		flood water backs up quickly across the flood plain beyond the Rodbourne Brook increasing the flooding along the Rodbourne Brook. The river levels recorded in these flooding incidents may not be giving a true reading until there is free flow under the bridge. When there is maximum unrestricted flow at the bridge flood water is held up by narrow channels where sediment has reduced the channel width in areas where the river was realigned by the Environment Agency or its predecessor resulting in more flooding in the flood plain onto the access roads	The **Outline CEMP [APP-277]** has been developed to control construction-phase risks and ensure there is no material increase in off-site flood risk. Where drainage measures are necessary, these include permeable surfacing, infiltration features, swales and attenuation storage to manage surface water and maintain greenfield runoff behaviour, as applicable. **Requirement 13 in Schedule 2 to the Draft DCO [APP-016]** secures that prior to the operation of the Scheme, a CEMP must be submitted to and approved by the relevant planning authority, the CEMP must be substantially in accordance with the Outline CEMP, and all construction works associated must be carried out in accordance with the approved CEMP. **Requirement 13 in Schedule 2 to the Draft DCO [APP-016]** secures that part of the authorised development can commence until, a CEMP is submitted to and approved by the relevant planning authority. The CEMP must be substantially in accordance with the Outline CEMP, and all construction works associated must be carried out in accordance with the approved CEMP.
GSPC-004	Transport and Access	Transport and access. Access roads to the village have been flooded each winter for the last three years, including C 82 in Rodbourne to the north and south of main railway line by the Gausebrook and the Rodbourne Brook. During the last three winters access to Great Somerford has also been restricted on the C66, C77 and C45 by flooding particularly when intense periods of rain fall on saturated ground. The roads within the parish already suffer from diversion routes when M4 and Kingway bridge are closed. The village will suffer from use of Sat Navs	The Applicant can confirm that access to Lime Down E will be made via the A429, as presented in **ES Volume 2, Figure 13-1 [APP-146]**. Therefore, the routes mentioned do not form part of the construction routes and would not be impacted by the Scheme. In addition, the **oCTMP [APP-287]** includes measures to manage the routes used by construction traffic which are secured under Requirement 15 of Schedule 2 of the **Draft DCO [APP-016]**.

Reference	Theme	Comments/Issues Raised	Applicant's Response
		by workers and delivery lorries, who do not follow the traffic management plan.	
GSPC-005	Cumulative Effects	Cumulative and in-combination effects. The parish of Great Somerford has not objected to the solar panel installations in neighbouring parishes (Sutton Benger, Corston and Lyneham). This proposal for five additional sites with huge panels, battery storage and the necessary infrastructure concern many parishioners. Eight sites in this corner of North Wiltshire will dominate the open countryside for future generations.	Wiltshire is not unusual in terms of the number of solar developments that have either been built or are consented or proposed. In terms of the Scheme, a comprehensive Cumulative and In-Combination Effects Assessment has been undertaken in accordance with Planning Inspectorate Advice Note 17 and the relevant NPS EN-1, NPS EN-3 and NPS EN-5 requirements which are set out within **Environmental Statement Chapter 21: Cumulative and In combination Effects [APP-073]** and associated **Appendices [APP-264].** Interaction with proposed or consented but not yet built developments has been fully explored within each of the technical assessments [**APP-059 - APP-072**] with a summary of each of these assessments provided within Environmental Statement Chapter 21 In-Combination and Cumulative Effects [**APP-073**]. Existing schemes are captured within the baseline environment. The four stage cumulative assessment methodology is described within **ES Chapter 6 EIA Methodology [APP-058].** 358 developments were included in the Long List [**APP-264**]. 41 developments are included in the short list (and are therefore assessed) including a number of proposed solar and BESS developments. The list of developments included in the cumulative assessment was reviewed and developed in consultation with Wiltshire Council. Taking a conservative worse case approach, significant cumulative effects are identified at a limited and discrete number of receptors comprising tourism and recreation impacts during the construction phase on Corsham Park, PRoW WT|CORM|122, long path and Sustrans Cycle Route 403, and on skylark at a District level. Skylark-specific mitigation and habitat enhancement measures are incorporated into the Scheme design to reduce

Reference	Theme	Comments/Issues Raised	Applicant's Response
			effects on skylark as far as practicable and are described in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061].** These include the provision of suitably large, open set-aside and grassland habitats designed to provide suitable skylark breeding and foraging conditions. These measures are illustrated in **ES Volume 2, Figure 3-4: Landscape and Ecological Mitigation Plan [APP-084]** and detailed in the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]**. Such measures have been designed to reduce the anticipated residual effects resulting from the Scheme to a Local level of geographic importance.
GSPC-006	Soils and Agriculture	Loss of Best Most Versatile Agricultural land, return after 60 years not credible. People within the village have concerns that not only will large areas of good quality land be lost to food production for 60 years, but also returning the land to the present grade will be highly unlikely. The proposals to grow grass under the panels is unlikely to be successful as the rain and sun falling under panels of this size will be limited.	The effects of the Scheme on agricultural land, including Best and Most Versatile (BMV) land, are assessed in **ES Volume 1, Chapter 17: Soils and Agriculture [APP-069]**, supported by **ES Volume 3, Appendix 17 1: Agricultural Land Classification and Soil Resource Survey Report [APP 243]**. The assessment identifies that land would be removed from arable rotation for the operational life of the Scheme, anticipated to be approximately 60 years. Although the primary agricultural use would cease during this period, the soil and land resource would be retained and would continue to fulfil ecological functions. Reduced disturbance during operation allows soils to recover from previous intensive agricultural use, with benefits to soil structure and soil biology over time. A detailed Soil Resource Management Plan (SRMP) will be prepared post consent and will be required to be in substantial accordance with the **Outline Soil Resource Management Plan [APP-280]** and is secured through Requirement 17 in Schedule 2 of the **draft DCO [APP-016].** The detailed SRMP will establish soil conditions at the time of decommissioning and set out how any requirement for remedial works will be identified. As best practice measures may evolve over the lifetime of the Scheme, the SRMP does not prescribe detailed remediation measures at this stage. Further detail on decommissioning activities will be

Reference	Theme	Comments/Issues Raised	Applicant's Response
			provided within the detailed Decommissioning Environmental Management Plan (DEMP). The Scheme design is described in **ES Volume 1, Chapter 3: The Scheme [APP 055],** which confirms that the solar PV panels are designed to allow sunlight to reach the ground beneath. Grass establishment beneath panels has been demonstrated on solar farms on agricultural land, and where grazing occurs it relies on adequate grass growth. Specific shade tolerant and low growing grass seed mixes are commercially available and have been used at solar sites. Grazing beneath panels is not relied upon as mitigation within the assessment.
GSPC-007	Description and DCO Process	Great Somerford Parish Council has more detailed evidence on the above objections and will make them available when requested. The submission of these objections was delegated to Cllr, Sturgis at the meeting on 7th January. 2026	The Applicant notes Great Somerford Parish Council's intention to provide further detailed evidence relating to its objections. The Applicant will review any additional evidence the Parish Council provides during the Examination.

5.24 Lea, Garsdon and Cleverton Parish Council

Table 5-24 RR-2750

Reference	Theme	Comments/Issues Raised	Applicant's Response
LGCPC-001	Description and DCO Process	Lea, Garsdon & Cleverton Parish Council fully recognises that the development of renewable energy resources is essential to mitigating the impacts of climate change, and that solar energy will play an important role in meeting national and global decarbonisation targets. The Parish Council is not opposed in principle to the generation of electricity by this method. However, the Council does not agree with the construction of a project of this scale on high-quality agricultural land in the heart of open countryside.	The effects of the Scheme on agricultural land, including Best and Most Versatile (BMV) agricultural land, are assessed in **ES Volume 1, Chapter 17: Soils and Agriculture [APP-069]**, supported by **ES Volume 3, Appendix 17 1: Agricultural Land Classification and Soil Resource Survey Report [APP 243]**. That assessment identifies that approximately one third of the agricultural land within the Order Limits is BMV land, the majority of which is Subgrade 3a, the lowest of the BMV grades. The assessment concludes that the Scheme will not result in significant adverse effects on BMV agricultural land, arising from the temporary and reversible loss of land during the operational period, with land reinstated and returned to agricultural use as far as practicable following decommissioning. The consideration of alternative sites and design evolution, including the availability and suitability of land of differing agricultural quality, is set out in **ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP 056]** and **ES Volume 3, Appendix 4 1: Site Selection Assessment Report [APP 185]**.
LGCPC-002	Soils and Agriculture	The loss of productive agricultural land raises serious concerns in relation to food security, agricultural resilience, and long-term land use sustainability. At a time of increasing pressure on domestic food production—driven by climate change, geopolitical instability, supply chain vulnerability, and rising global demand—the permanent or long-term removal of high-quality farmland from agricultural use is a matter of significant public interest.	The effects of the Scheme on agricultural land, including land quality and productivity, are assessed in **ES Volume 1, Chapter 17: Soils and Agriculture [APP 069]**, supported by **ES Volume 3, Appendix 17 1: Agricultural Land Classification and Soil Resource Survey Report [APP 243]**. That assessment identifies that the majority of agricultural land affected is not Best and Most Versatile (BMV) land, comprising predominantly Subgrade 3b and Grade 4 land, which is not considered high quality agricultural land in planning terms. The ES considers food production and agricultural sustainability within the wider policy context. Government led agricultural initiatives in recent years have prioritised soil health, environmental enhancement and climate resilience, recognising that long term food security is influenced by a range of factors beyond land take alone, including soil condition, climate change

Reference	Theme	Comments/Issues Raised	Applicant's Response
			and environmental pressures. The Scheme allows soils to remain in situ and undisturbed during operation, supporting soil recovery and long term land health, with land reinstated and returned to agricultural use as far as practicable following decommissioning. Government-led agricultural initiatives, such as the Sustainable Farming Incentive which is relaunching later in 2026, have prioritised soil health, environmental enhancement and climate resilience, recognising that long-term food security is influenced by a range of factors beyond land take alone, including soil condition, climate change and environmental pressures. The Scheme allows soils to remain in situ and undisturbed during operation, supporting soil recovery and long-term land health, with land reinstated and returned to agricultural use as far as practicable following decommissioning. No permanent loss of agricultural land is anticipated. The Applicant does not consider that food security will be compromised by the Scheme (or solar energy more widely). The latest figures to September 2024 indicate that solar occupied around 21,200 ha of agricultural land in the UK. In 2025, 545,000 ha of arable land in England were left uncropped (source: Department for Environment, Food & Rural Affairs, Agricultural land use in England at 1 June 2025). It should also be noted that food security is not identified as an issue within the suite of Energy National Policy Statements or the National Planning Policy Framework (NPPF). Further, the Government's UK Solar Roadmap (2025) states that solar development is not considered to compromise food security, but that the climate and nature crisis poses the greatest long-term risk to food security- a risk which the Scheme directly helps to address by providing a secure, low-carbon source of electricity. As set out in Section 2 of the **Outline Decommissioning Strategy [APP-279],** post-decommissioning of the Scheme, the landowners would choose how the land is to be used and

Reference	Theme	Comments/Issues Raised	Applicant's Response
			managed. The landowner may return all of the land to arable use, although it is likely that established habitats such as hedgerows and woodland would be retained given their potential benefits to agricultural land and the wider farming estate Whilst there is an environmental and economic cost to importing food, and it is recognised the UK imports a far greater amount of food than it exports, the impact of the Scheme on food import requirements or the food and drinks economy is not material at a national scale and has therefore not been assessed.
LGCPC-003	Soils and Agriculture	The parish council considers that the protection of such land is essential to maintaining the UK's ability to produce food domestically and to reduce reliance on imports.	The effects of the Scheme on agricultural land, including land quality and productivity, are assessed in **ES Volume 1, Chapter 17: Soils and Agriculture [APP-069]**, supported by **ES Volume 3, Appendix 17-1: Agricultural Land Classification and Soil Resource Survey Report [APP-243]**. That assessment identifies that the majority of agricultural land affected is not Best and Most Versatile (BMV) land, comprising predominantly Subgrade 3b and Grade 4 land, which is not considered high-quality agricultural land in planning terms. Government-led agricultural initiatives, such as the Sustainable Farming Incentive which is relaunching later in 2026, have prioritised soil health, environmental enhancement and climate resilience, recognising that long-term food security is influenced by a range of factors beyond land take alone, including soil condition, climate change and environmental pressures. The Scheme allows soils to remain in situ and undisturbed during operation, supporting soil recovery and long-term land health, with land reinstated and returned to agricultural use as far as practicable following decommissioning. No permanent loss of agricultural land is anticipated. The Applicant does not consider that food security will be compromised by the Scheme (or solar energy more widely). The latest figures to September 2024 indicate that solar occupied around 21,200 ha of agricultural land in the UK. In 2025, 545,000 ha of arable land in England were left uncropped (source: Department for Environment, Food & Rural Affairs, Agricultural

Reference	Theme	Comments/Issues Raised	Applicant's Response
			land use in England at 1 June 2025). It should also be noted that food security is not identified as an issue within the suite of Energy National Policy Statements or the National Planning Policy Framework (NPPF). Further, the Government's UK Solar Roadmap (2025) states that solar development is not considered to compromise food security, but that the climate and nature crisis poses the greatest long-term risk to food security- a risk which the Scheme directly helps to address by providing a secure, low-carbon source of electricity. As set out in Section 2 of the **Outline Decommissioning Strategy [APP-279],** post-decommissioning of the Scheme, the landowners would choose how the land is to be used and managed. The landowner may return all of the land to arable use, although it is likely that established habitats such as hedgerows and woodland would be retained given their potential benefits to agricultural land and the wider farming estate. The consideration of alternatives, including the availability and suitability of land of lower agricultural quality, is set out in **ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP 056]** and **ES Volume 3, Appendix 4 1: Site Selection Assessment Report [APP 185]**. This assessment explains how alternative sites, including areas of brownfield land and lower grade agricultural land, were considered in accordance with planning policy.
LGCPC-004	Site Selection and Alternatives	Greater priority should be given to brownfield sites, industrial land, existing buildings, large warehouse and logistics roofs, and transport or infrastructure corridors, all of which would allow renewable energy generation while safeguarding productive farmland and supporting food security objectives.	**ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]** explains how brownfield land, industrial land, previously developed land, and low-grade agricultural land were considered, in accordance with policy. Paragraph 2.10.31 of NPS EN-3 recognises that "*at this scale, it is likely that applicant's developments will use some agricultural land. Applicants should explain their choice of site, noting the preference for development to be on suitable brownfield, industrial and low and medium grade agricultural land*". As set out in **ES Volume 3, Appendix 4-1: Site Selection**

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Assessment Report [APP-185] the Applicant reviewed brownfield land register for local authorities within the area of search including Wiltshire Council, South Gloucestershire Council, Bath and Northeast Somerset Council, and Somerset Council. The assessment concluded that there were no brownfield sites within the search area of sufficient size to accommodate a large-scale solar development, either individually or cumulatively. The sites assessed were too small to support the proposed Scheme and were largely allocated for housing or mixed-use development, in line with local planning policies, thereby creating a conflict with the intended use for renewable energy infrastructure. Therefore, it was concluded that there was no available or suitable brownfield land for the purposes of the Scheme.
LGCPC-005	Soils and Agriculture	The Parish Council also questions the apparent principle underpinning this proposal: that national and global benefits should be delivered at the expense of significant local harm, with little or no local benefit in return. Whilst we recognise that concentrating infrastructure across large contiguous areas of farmland may simplify delivery and maximise commercial returns, this cannot justify imposing substantial adverse impacts on rural communities. Development should not proceed on the basis of convenience and profit where the costs are borne disproportionately by local residents and landscapes.	The Applicant is confident that the proposed management and mitigation measures set out in the **Environmental Statement [APP-052 to APP-265]** are comprehensive and robust and that the Scheme aligns with national and local planning policy; this is outlined in the **Planning Statement [APP-267].** Of particular relevance are Annex A: National Policy Statement Accordance Tables and Annex B: Local Policy Accordance Tables, of the Planning Statement which set out an appraisal of the Scheme against national and local planning policies. Of particular relevance to the assessment of effects on local communities are **ES Volume 1, Chapter 8: Landscape and Visual [APP-060], Chapter 13: Transport and Access [APP-065], Chapter 14: Noise and Vibration [APP-066], Chapter 15: Air Quality [APP-067], Chapter 16: Socioeconomics, Tourism and Recreation [APP-068], and Chapter 18: Human Health [APP-070]**, all of which consider potential impacts on residential properties and local communities. The **Statement of Need [APP-266]** describes that there is an urgent and unprecedented need for new low carbon generation in

Reference	Theme	Comments/Issues Raised	Applicant's Response
			the UK to meet our climate change, energy security and affordability targets. Further, the Government considers that a secure, reliable, affordable, net zero consistent system in 2050 is likely to be composed predominantly of wind and solar (NPS EN-1, Para 3.3.20). Further, Section 2.9 of the **Statement of Need [APP-266]** describes that the government is seeking a large capacity of new low carbon schemes to come forwards to prioritise projects needed for 2030, while maintaining a robust pipeline of projects beyond 2030 towards meeting net zero by 2050. National Policy Statement EN-1 also states that the Secretary of State should assess all applications for development consent for the types of infrastructure included by the NPS (including solar) on the basis that there is demonstrated urgent need for them, that substantial weight should be given to this need, and that the Secretary of State is not required to consider the specific contribution of any individual project to be satisfied that need is established [EN-1 Paras 3.2.6 - 3.2.8]. The Applicant has assessed matters relating to people's lives and livelihoods in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]**, and to their health and wellbeing in **ES Volume 1, Chapter 18: Human Health [APP-070]**. These assessments find no significant adverse effects to the local population with respect to social or health effects, subject to the implementation of mitigation measures secured through the Requirements in Schedule 2 to the **Draft DCO [APP-016]**. With respect to human health, the assessment outcome that there is no significant adverse effect to health generated by the Scheme has been agreed by the UK Health Security Agency in their relevant representation **[RR-4798]**. The Applicant acknowledges that any adverse effects from the Scheme are more likely to be felt locally than the largely wider-scale benefits of the Scheme. The Scheme is anticipated to help meet the UK's net zero requirements for energy production,

Reference	Theme	Comments/Issues Raised	Applicant's Response
			which is considered a critical national priority and set out in National Policy Statements for Energy NPS EN-1 (section 4.2) and EN-3. This therefore will benefit the national population rather than just the local population. The benefits of the Scheme are set out in Section 5.3 of the **Planning Statement [APP-267]** and include the delivery of large amounts of cheap, secure, and low carbon electricity which will help the UK to achieve net zero by 2050, ecological and landscape enhancements, biodiversity net gain, permissive paths, employment generation, economic benefits and skills training. The Scheme is also anticipated to benefit the population within approximately 20km of the Scheme, through providing employment and income especially during construction and peak replacement activities, and providing skills and training opportunities. Where the Scheme is anticipated to benefit local people more specifically, this is done through providing onsite permissive paths to increase access to the countryside, providing improved landscape planting through reinforcing existing hedgerows and planting of new trees, providing biodiversity net gains through habitat improvements. That notwithstanding, the Applicant is committed to providing a Community Benefit Fund to allow for community-driven benefits that are not necessarily associated with the Scheme itself. The purpose is to establish a means to recognise local community needs that the Applicant wants to be able to contribute towards in recognition of the local impact of the Scheme. The Community Benefit Fund is separate from the DCO process, and so is not bound to the same timescales or information requirements as submitted information. Furthermore, community benefits are legally immaterial to planning decisions and cannot be considered when deciding whether to grant planning consent.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			The Applicant acknowledges this and so has sought to provide the Community Benefit Fund voluntarily even though it won't add favourable weight in the planning balance.
LGCPC-006	Site Selection and Alternatives	The Council also has serious concerns regarding the efficiency and sustainability of the proposed location. Large-scale solar developments situated far from existing grid infrastructure necessitate extensive enabling works, including significant alterations to the local road network to accommodate abnormal loads, heavy goods vehicles, and sustained construction traffic. These works would result in substantial disruption to rural roads that are not designed for industrial-scale use, leading to landscape harm, loss of rural character, traffic safety risks, and prolonged disturbance to local communities. Such impacts further undermine the sustainability of the proposal while offering limited local benefit.	Details on the Applicant's site selection process and alternatives considered are set out in **ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP-056]** and **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]**. In terms of traffic safety, the assessment presented in Annex H of **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]** includes an analysis of accident collisions in the study area and on construction routes. **ES Volume 1, Chapter 13: Transport and Access [APP-065]** concludes that the low level of construction traffic associated with the Scheme is unlikely to materially affect road safety on the links in the Study Area, and the effects on accidents and safety from the Scheme's construction phase on all links will be temporary and negligible (not significant). This is summarised in Table 13-31 of this chapter. In regard to traffic impacts and construction worker car trips, these are managed through measures committed to and secured through and the **OCTMP [APP-287]** listed below. Construction worker vehicle trips through the village are likely to be negligible because of these measures**:** • a construction worker travel plan; • Shuttle Bus - The location where staff will travel from is unknown at this stage as it will depend on the appointed contractor. However, it is envisaged that the majority of non-local workforce will stay at local accommodation and be transported to the Order Limits by shuttle bus to minimise the impact on the strategic and local highway network; and • Car sharing – A car sharing scheme will be set up. This will match construction workers who live in a similar area, or who follow a similar route to the

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Order Limits and encourage them to car share to save costs and reduce their impact on the environment. An **oCTMP [APP-287]** supports the DCO Application and presents outline measures which restrict construction deliveries to the proposed construction routes. It also includes road condition surveys to ensure any damage to the highway network caused by construction traffic is identified and rectified, management of construction deliveries to avoid the requirement for HGVs generated by the Scheme passing each other in opposite directions on the local roads, and restricted hours of deliveries outside of peak hours. With this mitigation in place, **ES Volume 1, Chapter 13-1: Transport and Access [APP-065]** concludes that impacts would be negligible to minor adverse. A final CTMP would be prepared post consent and must be substantially in accordance with the **oCTMP [APP-287]** and approved by the relevant local planning authorities (in consultation with the relevant highway authorities), as secured by Requirement 15 in Schedule 2 of the **Draft DCO [APP-016]**. <u>Landscape and Visual</u> An assessment of landscape and visual effects are presented in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**. The Landscape and Visual Impact Assessment (LVIA) assesses effects on identified landscape and visual receptors, including residential properties, users of public rights of way and roads, and identifies where significant effects may occur. The LVIA found no significant long term visual effects to residential properties as a consequence of the Scheme. The visual effects of the Scheme are summarised in **ES Volume 3, Appendix 8-3-3 [APP-192]**. Temporary Major/Moderate and Moderate Adverse effects on visual receptors have been recorded across the Scheme during construction and at Year 1. However, for the majority of these receptors, the effects reduce to

Reference	Theme	Comments/Issues Raised	Applicant's Response
			non –significant levels as a result of the embedded mitigation measures which are set out in Section 8.9 of **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]** and include landscape buffers, retention of existing hedgerows and woodland, and new planting to provide screening and integration over time. The assessment also identifies that there would be some long-term significant effects on the visual amenity of users of some localised footpaths, as a result of the Scheme. This predominantly relates to locations where footpaths diagonally cross fields and mitigation planting would be inappropriate to landscape character and the legacy landscape. Those receptors which would experience Significant Long Term Visual Effects are listed in Table 8-30 of the **LVIA [APP-060].** The scale of development within the Order Limits has been significantly reduced from the layout assessed in the Preliminary Environmental Information Report (PEIR) through an iterative design process undertaken in response to consultation and in accordance with the mitigation hierarchy to avoid, reduce and mitigate adverse effects. As part of this design evolution, panels along the edge of the Cotswolds National Landscape and along the Fosse Way have been removed. Mitigation measures to address landscape and visual effects are set out in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**, **Figure 3-4-1 to 3-4-5.2 Landscape and Ecology Mitigation Plan [APP-084]** and secured within the **Outline Landscape and Ecological Mitigation Plan (LEMP) [APP-283]** and the **Outline Ecological Protection and Mitigation Strategy (EPMS) [APP-284]**. These documents include proposals for new and enhanced planting, retention of existing hedgerows and woodland, and landscape integration measures to reduce visual effects over time. In addition, the Scheme design incorporates minimum offsets from existing landscape features, including residential properties, ancient woodland, woodland, hedgerows, public rights of way

Reference	Theme	Comments/Issues Raised	Applicant's Response
			and watercourses, to further limit visual impacts. Although these measures reduce the effects of the Scheme on nearly all receptors, as noted above there are 10 receptors which would experience Significant Visual Effects for the duration of the Scheme as set out Table 8-30 of the **LVIA [APP-060]**. Mitigation measures to address landscape and visual effects are set out in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**, **Figure 3-4-1 to 3-4-5.2 Landscape and Ecology Mitigation Plan [APP-084]**. The preparation, approval and implementation of detailed landscape and ecological management plans, substantially in accordance with the **OLEMP [APP-283]** and **EPMS [APP-284]**, are secured through requirements in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that the identified mitigation measures are delivered and maintained throughout the lifetime of the Scheme.
LGCPC-007	Landscape and Visual	In summary, while Lea, Garsdon & Cleverton Parish Council supports the principle of renewable electricity generation, it objects strongly to the Lime Down Solar Park proposal due to: · the excessive scale and intensity of development in open countryside;	The Applicant notes this comment. The Project has been designed to deliver the greatest possible benefit from the available land and the available grid connection, whilst avoiding, minimising and/or mitigating harmful environmental effects. As per the description set out in **ES Volume 1, Chapter 3: The Scheme [APP-055]** the total area within the DCO Order Limits encompasses approximately 1,237 hectares (ha). Of this, the 'Solar PV Sites' comprise approximately 749.1 ha of land. Around 479.5 ha of this land is proposed as being required for installation of solar PV, battery storage, and associated infrastructure. The remaining 269.5 ha would provide areas dedicated to ecological mitigation, measurable Biodiversity Net Gain (BNG) delivery, landscaping, offsets and agricultural land managed for environmental enhancement and habitat creation. The Applicant remains committed to delivering a Scheme that makes a meaningful contribution to the UK's transition to net zero, while also seeking to minimise adverse impacts and

Reference	Theme	Comments/Issues Raised	Applicant's Response
			maximise opportunities for environmental enhancement and community benefits. An assessment of landscape and visual effects are presented in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**. The Landscape and Visual Impact Assessment (LVIA) assesses effects on identified landscape and visual receptors, including residential properties, users of public rights of way and roads, and identifies where significant effects may occur. The LVIA found no significant long term visual effects to residential properties as a consequence of the Scheme. The visual effects of the Scheme are summarised in **ES Volume 3, Appendix 8-3-3 [APP-192]**. Temporary Major/Moderate and Moderate Adverse effects on visual receptors have been recorded across the Scheme during construction and at Year 1. However, for the majority of these receptors, the effects reduce to non –significant levels as a result of the embedded mitigation measures which are set out in Section 8.9 of **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]** and include landscape buffers, retention of existing hedgerows and woodland, and new planting to provide screening and integration over time. The assessment also identifies that there would be some long-term significant effects on the visual amenity of users of some localised footpaths, as a result of the Scheme. This predominantly relates to locations where footpaths diagonally cross fields and mitigation planting would be inappropriate to landscape character and the legacy landscape. Those receptors which would experience Significant Long Term Visual Effects are listed in Table 8-30 of the **LVIA [APP-060].** The scale of development within the Order Limits has been significantly reduced from the layout assessed in the Preliminary Environmental Information Report (PEIR) through an iterative design process undertaken in response to consultation and in accordance with the mitigation hierarchy to avoid, reduce and

Reference	Theme	Comments/Issues Raised	Applicant's Response
			mitigate adverse effects. As part of this design evolution, panels along the edge of the Cotswolds National Landscape and along the Fosse Way have been removed. Mitigation measures to address landscape and visual effects are set out in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**, **Figure 3-4-1 to 3-4-5.2 Landscape and Ecology Mitigation Plan [APP-084]** and secured within the **Outline Landscape and Ecological Mitigation Plan (LEMP) [APP-283]** and the **Outline Ecological Protection and Mitigation Strategy (EPMS) [APP-284]**. These documents include proposals for new and enhanced planting, retention of existing hedgerows and woodland, and landscape integration measures to reduce visual effects over time. In addition, the Scheme design incorporates minimum offsets from existing landscape features, including residential properties, ancient woodland, woodland, hedgerows, public rights of way and watercourses, to further limit visual impacts. Although these measures reduce the effects of the Scheme on nearly all receptors, as noted above there are 10 receptors which would experience Significant Visual Effects for the duration of the Scheme as set out Table 8-30 of the **LVIA [APP-060]**. Mitigation measures to address landscape and visual effects are set out in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**, **Figure 3-4-1 to 3-4-5.2 Landscape and Ecology Mitigation Plan [APP-084]**. The preparation, approval and implementation of detailed landscape and ecological management plans, substantially in accordance with the **OLEMP [APP-283]** and **EPMS [APP-284]**, are secured through requirements in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that the identified mitigation measures are delivered and maintained throughout the lifetime of the Scheme.

Reference	Theme	Comments/Issues Raised	Applicant's Response
LGCPC-008	Soils and Agriculture	· the loss of high-quality agricultural land and the associated risks to food security and agricultural resilience;	The effects of the Scheme on agricultural land, including land quality and productivity, are assessed in **ES Volume 1, Chapter 17: Soils and Agriculture [APP-069]**, supported by **ES Volume 3, Appendix 17-1: Agricultural Land Classification and Soil Resource Survey Report [APP-243]**. That assessment identifies that the majority of agricultural land affected is not Best and Most Versatile (BMV) land, comprising predominantly Subgrade 3b and Grade 4 land, which is not considered high-quality agricultural land in planning terms. Government-led agricultural initiatives, such as the Sustainable Farming Incentive which is relaunching later in 2026, have prioritised soil health, environmental enhancement and climate resilience, recognising that long-term food security is influenced by a range of factors beyond land take alone, including soil condition, climate change and environmental pressures. The Scheme allows soils to remain in situ and undisturbed during operation, supporting soil recovery and long-term land health, with land reinstated and returned to agricultural use as far as practicable following decommissioning. No permanent loss of agricultural land is anticipated. The Applicant does not consider that food security will be compromised by the Scheme (or solar energy more widely). The latest figures to September 2024 indicate that solar occupied around 21,200 ha of agricultural land in the UK. In 2025, 545,000 ha of arable land in England were left uncropped (source: Department for Environment, Food & Rural Affairs, Agricultural land use in England at 1 June 2025). It should also be noted that food security is not identified as an issue within the suite of Energy National Policy Statements or the National Planning Policy Framework (NPPF). Further, the Government's UK Solar Roadmap (2025) states that solar development is not considered to compromise food security, but that the climate and nature crisis poses the greatest long-term risk to food security- a risk which the Scheme directly

Reference	Theme	Comments/Issues Raised	Applicant's Response
			helps to address by providing a secure, low-carbon source of electricity. As set out in Section 2 of the **Outline Decommissioning Strategy [APP-279],** post-decommissioning of the Scheme, the landowners would choose how the land is to be used and managed. The landowner may return all of the land to arable use, although it is likely that established habitats such as hedgerows and woodland would be retained given their potential benefits to agricultural land and the wider farming estate. Whilst there is an environmental and economic cost to importing food, and it is recognised the UK imports a far greater amount of food than it exports, the impact of the Scheme on food import requirements or the food and drinks economy is not material at a national scale and has therefore not been assessed.
LGCPC-009	Community Benefits	· the imbalance between the substantial impacts on local communities and the limited local benefits delivered.	The Applicant acknowledges that many of the benefits of the Scheme are felt over a wider area than the adverse effects from the Scheme. As highlighted, this includes energy generation, and so is a nationwide benefit. Employment and economic benefits from direct employment, maintenance and supply chains will likely be county-level or regional, albeit measures secured through the **OSSCEP [APP-285]** seek to improve local economic prosperity from the Scheme. Locally specific benefits largely are based around landscape and ecological enhancements, and the provision of permissive paths to improve PROW access and connectivity. The general community is also able to benefit from the Community Benefit Fund, which can be used towards local infrastructure and benefits as decided by local stakeholders. The Community Benefit Fund is however agreed under a separate process to the DCO and so does not form part of the assessment of whether the DCO should be consented or not.

6 The Applicant's responses to parties listed within the Book of Reference

6.1 Steven Purvis

Table 6-1 RR-4489

Reference	Theme	Comments/Issues Raised	Applicant's Response
SP-001	Landscape and Visual Construction and Decommissioning Ecology and Biodiversity Socio-Economics, Tourism and Recreation Soils and Agriculture Site Selection Transport and Access Community Benefit	While I support renewable energy in principle, putting a massive industrial-scale solar farm at Lime Down, in the heart of the Cotswolds, feels fundamentally wrong. The area is designated as an Area of Outstanding Natural Beauty precisely because its landscape, tranquillity and historic character are considered nationally important, and once that character is industrialised it can't realistically be restored. A development of this scale would inevitably alter long-established views, harm biodiversity through land clearance and fencing, and undermine the visitor economy that many local businesses depend on. It's also hard to justify choosing protected countryside when there are so many alternatives - brownfield land, rooftops, former quarries, or lower-grade farmland outside the AONB - that wouldn't carry the same permanent cost. Construction traffic, grid infrastructure and access works would further strain narrow rural roads, while the benefits of the electricity generated are unlikely to flow directly to local communities.	<u>Landscape and Visual</u> An assessment of landscape and visual effects is provided in the Landscape and Visual Impact Assessment (LVIA) presented in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**. The LVIA assesses effects on identified landscape and visual receptors, including residential properties and users of public rights of way, and identifies where significant effects may occur. The LVIA found no significant long term visual effects to residential receptors as a consequence of the Scheme. The Cotswolds National Landscape (CNL) is fully assessed as a standalone receptor within **ES Volume 3, Appendix 8.6: Assessment of Effects on the Special Qualities of the Cotswolds National Landscape [APP-197]**. This assessment considers the effects of the Scheme on landscape character, visual amenity and the special qualities of the CNL. The assessment found that there would be some short term impact to landscape character within the setting of the CNL but due to the avoidance measures embedded within the Scheme, harm to the CNL itself would be minimal with beneficial effects in the long term which would further the purposes of the designation. In respect of visual amenity, some short-term adverse effects would be experienced by a small number of visual receptors with views to and from the CNL. However, these would reduce over time as a result of the proposed mitigation. The assessment of effects on the special qualities of the CNL scoped out 3 SQs as there is no association with the Site. The assessment found that there are no direct effects on the remaining SQs. There are some Minor/ Negligible short-term effects on a small number of visual receptors within the setting of the CNL which effect SQ7 -Tranquillity and SQ13 Archaeology and historic associations. However, these effects are mitigated by Year 15 when proposed vegetation has

Reference	Theme	Comments/Issues Raised	Applicant's Response
			matured. The assessment also found that there would be beneficial effects on SQ 6 – Biodiversity and nature recovery as a result of the delivery of approximately 119.7 hectares of flower-rich neutral grassland (as defined in the BNG assessment) and SQ 12 - An accessible landscape as a result of the delivery of approximately 12.8km of new permissive paths within the setting of the CNL. The remaining SQs would remain entirely intact. The scale of development within the Order Limits has been significantly reduced from the layout assessed in the Preliminary Environmental Information Report (PEIR) through an iterative design process undertaken in response to consultation and in accordance with the mitigation hierarchy to avoid, reduce and mitigate adverse effects. As part of this design evolution, panels along the edge of the Cotswolds National Landscape and along the Fosse Way have been removed. The Scheme was refined through an iterative design process to avoid and reduce effects on the CNL and its setting. Panels along the edge of the CNL were removed from the Order Limits in fields C2, C3 and C4 where significant visual effects on receptors within the CNL were identified. Panels were also removed from fields C1, C6, C8, the western section of C9 and the majority of C10, with this land now proposed for ecological mitigation to protect the setting of the CNL. In addition, panels within fields A11 and A12 were removed and the land repurposed for ecological mitigation to protect the setting of the CNL towards Sherston. All land parcels adjacent to the CNL are proposed to deliver habitat enhancement, informed by the CNL Management Plan and the Cotswolds National Landscape Strategy and Guidelines, to further the purposes of the designation. In addition, the Scheme design incorporates minimum offsets from existing landscape features, including residential properties,

Reference	Theme	Comments/Issues Raised	Applicant's Response
			ancient woodland, woodland, hedgerows, public rights of way and watercourses, to further limit visual impacts. Mitigation measures to address landscape and visual effects are set out in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**, **Figure 3-4-1 to 3-4-5.2 Landscape and Ecology Mitigation Plan [APP-084]** and secured within the **Outline Landscape and Ecological Mitigation Plan (LEMP) [APP-283]** and the **Outline Ecological Protection and Mitigation Strategy (EPMS) [APP-284]**. Details of the proposed landscape and ecological mitigation and enhancement measures are provided in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**, **Figure 3-4-1 to 3-4-5.2 Landscape and Ecology Mitigation Plan [APP-084]** and secured within the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]** and the **Outline Ecological Protection and Mitigation Strategy (EPMS) [APP-284]**. The preparation, approval and implementation of detailed landscape and ecological management plans, substantially in accordance with the **OLEMP [APP-283]** and **EPMS [APP-284]**, are secured through requirements in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that the identified mitigation measures are delivered and maintained throughout the lifetime of the Scheme. The preparation, approval and implementation of the detailed Landscape and Ecological Management Plan, substantially in accordance with the **OLEMP [APP-283]**, are secured through Requirement 7 in Schedule 2 of the **Draft Development Consent Order [APP-016]**. The preparation, approval and implementation of the detailed Ecological Protection and Mitigation Strategy, substantially in accordance with the **EPMS [APP-284]**, are secured through Requirement 8 in Schedule 2 of the **Draft Development Consent Order [APP-016]**. These requirements

Reference	Theme	Comments/Issues Raised	Applicant's Response
			ensure that the identified mitigation and enhancement measures are delivered and maintained throughout the lifetime of the Scheme. <u>Decommissioning</u> Regarding the restoration of land, the effects of decommissioning on soils and agricultural land are assessed in **ES Volume 1, Chapter 17 Soils and Agriculture [APP-069]**. As stated in this chapter, all land will be returned to its original use and condition as far as practicable and returned to the landowner. The effect on agricultural land quality at decommissioning would be influenced by the extent of disturbance caused by the removal of the Solar PV Panels, for example the presence and dimensions of leftover voids or the depth of the remaining underground cables. Currently, the most environmentally acceptable option is to leave the cables in-situ, although the cables could be removed by excavating at regular intervals and pulling the cable through to the extraction point, thus avoiding the need to excavate the entire cable trench. In either case, the effects would be less than those likely to occur during the construction phase. Built aspects of the Scheme such as the BESS Area and substations are also subject to the proposal to return the land to its original use and condition, which is primarily agricultural land of Subgrade 3b quality, with some Subgrade 3a at the BESS Area. Measures to manage decommissioning and reinstatement are set out in the **Outline Decommissioning Strategy [APP-279]**, which has been submitted as part of the DCO Application. The Decommissioning Strategy will include robust methodologies and control points to avoid contamination of the underlying land with physical or chemical contaminants and will be applied in conjunction with the Soil Resources Management Plan (SRMP) in order to promote successful reinstatement.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			A detailed Decommissioning Strategy will be prepared substantially in accordance with the **Outline Decommissioning Strategy [APP-279]** and must be submitted to and approved by the relevant local planning authority prior to the commencement of decommissioning. This is secured through Requirement 20 in Schedule 2 of the **Draft Development Consent Order [APP-016]**. In addition, the Applicant is seeking a time-limited consent for the Scheme to have an operational period of 60 years, with decommissioning to take place following cessation of operation. This is secured by Requirement 20 in Schedule 2 of the **Draft DCO [APP-016]**. The Applicant confirms that none of the land will be considered brownfield after decommissioning. The expectation is that the land will return to farming, but the Applicant cannot dictate what will happen to the land post-decommissioning when the Applicant no longer has an interest in the land. <u>Ecology and Biodiversity</u> Potential impacts on ecology and biodiversity are fully assessed in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**. This assessment considers baseline ecological conditions and evaluates likely significant effects arising during the construction, operation and decommissioning phases of the Scheme. It identifies avoidance, mitigation and enhancement measures to address potential impacts on habitats and protected and notable species. It also identifies opportunities for ecological enhancement, including the creation and long-term management of habitats, and delivery of biodiversity net gain. The assessment concludes that, with the identified embedded and additional mitigation measures in place, no unacceptable significant adverse effects on ecology and biodiversity are

Reference	Theme	Comments/Issues Raised	Applicant's Response
			anticipated. The Applicant notes that the approach to the assessment in relation to ecology and biodiversity in general is under discussion with Wiltshire Council and Natural England and is set out in the relevant **Statements of Common Ground** to be submitted at Deadline 1. During construction, specific measures are proposed to avoid disturbance and displacement of wildlife. These include protective buffers around sensitive habitats and features, timing restrictions on vegetation clearance, pre-construction ecological surveys, species-specific mitigation, and pollution prevention controls which are set out in the **Outline Ecological Protection and Mitigation Strategy (EPMS) [APP-284]**. Measures to protect trees and hedgerows are also set out in **ES Volume 1, Chapter 10 Arboriculture [APP-062]**. The Scheme will also result in the cessation of intensive arable farming within the Solar PV Sites. As identified in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061],** this is expected to reduce the ongoing application of herbicides and pesticides, supporting improvements in habitat quality over the operational lifetime of the Scheme. The reversion of existing arable land within the Solar PV Sites to predominantly grassland habitats can be expected to benefit a wide range protected and notable species, as identified in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061].** Mitigation and enhancement measures are detailed in the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]** and the **Outline Ecological Protection and Mitigation Strategy (OEPMS) [APP-284]**, which set out habitat creation, species protection measures, buffer zones and long-term ecological management.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			The preparation, approval and implementation of the detailed Landscape and Ecological Management Plan, substantially in accordance with the **OLEMP [APP-283]**, are secured through Requirement 7 in Schedule 2 of the **Draft Development Consent Order [APP-016]**. The preparation, approval and implementation of the detailed Ecological Protection and Mitigation Strategy, substantially in accordance with the **OEPMS [APP-284]**, are secured through Requirement 8 in Schedule 2 of the **Draft Development Consent Order [APP-016]**. These requirements ensure that ecological protection and enhancement measures are delivered and maintained throughout construction and operation of the Scheme. <u>Tourism</u> An assessment of the likely effects of the Scheme on the local economy and employment is provided in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]**. This chapter considers potential impacts on construction and engineering sectors, agricultural activity, tourism-related businesses, and wider local economic conditions during construction, operation and decommissioning. Supporting evidence is provided in **ES Volume 3, Appendix 16-3: Socio-Economics, Tourism and Recreation – Summary of Non-Significant Effects [APP-242]**, which summarises that effects on the local economy and economic prosperity are assessed as negligible to minor beneficial, with construction expenditure and employment generation contributing positive, temporary effects on local economic activity. The assessment therefore concludes that the Scheme would not result in significant adverse effects on local businesses or the wider local economy, and that socio-economic benefits,

Reference	Theme	Comments/Issues Raised	Applicant's Response
			including job creation and local supply-chain opportunities, are expected during the construction phase, with more modest economic and skills and supply chain opportunities during the operational phase. The Applicant notes that the approach to assessment of socio-economic effects has been agreed with Wiltshire Council's Economic and Regeneration Team, with the exception of matters relating to agricultural employment, which the Applicant is discussing with the team is . This is set out in the Statement of Common Ground with Wiltshire Council to be submitted at Deadline 1. Soils and Agriculture An assessment of the potential effects of the Scheme on soils and agricultural land is provided in **ES Volume 1, Chapter 17 Soils and Agriculture [APP-069]**. This chapter considers baseline agricultural land quality, including Best and Most Versatile (BMV) land, and assesses likely significant effects arising from construction, operation and decommissioning of the Scheme, together with embedded mitigation measures. The areas of each Agricultural Land Classification (ALC) grade affected by the Scheme are set out in **ES Volume 1 Chapter 17: Soils and Agriculture [APP-069]**, Section 17.7. Of the agricultural land within the Solar PV Sites, approximately 477.4 hectares (around 67%) is classified as Subgrade 3b or Grade 4 and is therefore not BMV land. There is no Grade 1 land, around 30.8 hectares (approximately 4%) of Grade 2 land, and approximately 209.3 hectares (around 29%) of Subgrade 3a land. The distribution of ALC grades is shown in **ES Volume 2, Figure 17-2: Agricultural Land Classification Mapping [APP-172]**. The Applicant has had regard to agricultural land quality in the design and site selection process and has sought, where

Reference	Theme	Comments/Issues Raised	Applicant's Response
			practicable, to locate infrastructure on lower quality land, as detailed in **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]**. In relation to suggestions that brownfield land or alternative locations should be used, including rooftop, these matters are addressed in **ES Volume 1, Chapter 4 Alternatives and Design Evolution** and in the **Statement of Need [APP-056 and APP-266]**. The Applicant has considered alternatives, including previously developed land and other forms of solar deployment, as part of the site selection and design evolution process. As shown in Table 2-2 of **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]**, the Applicant has considered previously developed land/ brownfield land over 1 hectare within the area of search, based on the brownfield land registers of the relevant Local Planning Authorities, and concluded that none of the sites are large enough to provide a viable land parcel of at least 40 ha and sites were not considered to be available as they have planning permission for residential development and/or are allocated for residential/mixed use development. National policy and government guidance, as set out in the **Statement of Need [APP-266]**, recognise that while rooftop and smaller-scale solar installations are an important part of the energy mix, they cannot alone meet the scale of capacity required to achieve clean power and net zero objectives. Large-scale ground-mounted solar therefore remains necessary in addition to, not instead of, rooftop solar. <u>Transport and Access</u> The capacity of local roads and infrastructure to accommodate construction vehicles is assessed in **ES Volume 1, Chapter 13: Transport and Access [APP-065]**, which considers

Reference	Theme	Comments/Issues Raised	Applicant's Response
			construction traffic volumes, vehicle types, route suitability and network performance. The assessment concludes that, with appropriate mitigation in place, there would be no significant adverse impacts on the local highway network. Supporting technical information is provided in **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]**, which identifies specific locations where traffic management measures or passing arrangements may be required on narrower sections of construction routes. The assessment presented in Annex H of **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]** demonstrates adequate carriageway width or frequency of passing place opportunity to pass at least an HGV and a light vehicle as requested in comments provided by Wiltshire Council. All construction routes also include passing points to allow two HGVs to pass. Mitigation measures to manage construction traffic are set out in the **Outline Construction Traffic Management Plan (CTMP) [APP-287]**. The CTMP is designed to minimise the effects of construction traffic on local roads and includes measures for vehicle routing, delivery scheduling and liaison with the local highway authority. The preparation, approval and implementation of the final CTMP, substantially in accordance with the outline CTMP, are secured through Requirement 15 of Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring construction traffic impacts on local roads and infrastructure are appropriately managed throughout the construction phase of the Scheme. Cable Route

Reference	Theme	Comments/Issues Raised	Applicant's Response
			The construction of the cable route has been assessed throughout the **ES [APP-052 to APP-265]**, which considers the likely significant construction effects associated with these works. The **ES [APP-052 to APP-265]** assesses the cable route within defined parameters, including limits on working width and trench dimensions, to ensure that a reasonable worst-case scenario is assessed. The detailed design and construction of the cable route would be undertaken within the parameters assessed and authorised by the DCO. Measures to manage and minimise construction effects, including reinstatement of land following installation, are secured in the **Outline Construction Environmental Management Plan (CEMP) [APP-277]**. Requirement 13 in Schedule 2 to the **Draft DCO [APP-016]** secures that part of the authorised development can commence until, a CEMP is submitted to and approved by the relevant planning authority. The CEMP must be substantially in accordance with the Outline CEMP, and all construction works associated must be carried out in accordance with the approved CEMP. <u>Community Benefit</u> The Applicant acknowledges that any adverse effects from the Scheme are more likely to be felt locally than the largely wider-scale benefits of the Scheme. The Scheme will make a contribution to meeting the UK's net zero requirements for energy production, which is considered a critical national priority and set out in National Policy Statements for Energy NPS EN-1 (section 4.2) and EN-3. This therefore will benefit the national population rather than just the local population. The benefits of the Scheme are set out in Section 5.3 of the **Planning**

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Statement [APP-267] and include the delivery of large amounts of cheap, secure, and low carbon electricity which will help the UK to achieve net zero by 2050, ecological and landscape enhancements, biodiversity net gain, permissive paths, employment generation, economic benefits and skills training. The Scheme is also anticipated to benefit the population within approximately 20km of the Scheme, through providing employment and income especially during construction and peak replacement activities, and providing skills and training opportunities. Where the Scheme is anticipated to benefit local people more specifically, this is done through providing onsite permissive paths to increase access to the countryside, providing improved landscape planting through reinforcing existing hedgerows and planting of new trees, providing biodiversity net gains through habitat improvements. That notwithstanding, the Applicant is committed to providing a Community Benefit Fund to allow for community-driven benefits that are not necessarily associated with the Scheme itself. The Community Benefit Fund does not form part of the DCO application and this funding is not required to mitigate the impacts of the Scheme. Therefore it cannot be taken into account in the decision making process for determining the DCO application, however it will be available to fund local projects.
SP-002	Description and DCO Process	Approving a project like this would also set a worrying precedent, making it harder to defend the Cotswolds against similar proposals in the future.	National Policy Statement EN-3 Paras 2.10.11 and 2.10.18 explain that the availability of grid connection, suitable irradiance levels, and local topography are key inputs to the selection of sites suitable for large-scale solar generation developments. The number of locations within the UK at which large-scale solar generation is suitable is therefore likely to be limited, and this is a material issue when considering how the

Reference	Theme	Comments/Issues Raised	Applicant's Response
			UK is to meet the urgent need for low carbon generation as is set out in the NPSs. This point is expanded upon in the **Statement of Need [APP-266]** in particular in Section 4.3. Chapter 8 of the **Statement of Need [APP-266]** provides evidence to support the suitability of the proposed location of the Scheme for large-scale solar plus storage in relation to the timeliness and availability of the grid connection, transmission system operability and the decarbonisation and energy security benefits the Scheme will bring forward from this location. A comprehensive Cumulative and In-Combination Effects Assessment has been undertaken in accordance with Planning Inspectorate Advice Note 17 and the relevant NPS EN-1, NPS EN-3 and NPS EN-5 requirements which are set out within **ES Volume 1, Chapter 21: Cumulative and In-Combination Effects [APP-074]** and associated appendices**, ES Volume 3, Appendix 21-1 Long List of In-Combination Effects and Cumulative Developments [APP-264].** Interaction with proposed or consented but not yet built developments has been fully explored within each of the technical assessments **[APP-059 - APP-072]** with a summary of each of these assessments provided within **ES Volume 1, Chapter 21 In-Combination and Cumulative Effects [APP-073].** Existing schemes are captured within the baseline environment. The four stage cumulative assessment methodology is described within **ES Volume 1, Chapter 6: EIA Methodology [APP-058].** 358 developments were included in the **Long List [APP-264].** 41 developments are included in the short list (and are therefore assessed) including a number of proposed solar and BESS developments. The list of developments included in the cumulative assessment was reviewed and developed in consultation with Wiltshire Council.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Taking a conservative worse case approach, significant cumulative effects are identified at a limited and discrete number of receptors comprising tourism and recreation impacts during the construction phase on Corsham Park, PRoW WT|CORM|122, long path and Sustrans Cycle Route 403, and on skylark at a District level. Skylark-specific mitigation and habitat enhancement measures are incorporated into the Scheme design to reduce effects on skylark as far as practicable and are described in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061].** These include the provision of suitably large, open set-aside and grassland habitats designed to provide suitable skylark breeding and foraging conditions. These measures are illustrated in **ES Volume 2, Figure 3-4: Landscape and Ecological Mitigation Plan [APP-084]** and detailed in the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]**. Such measures have been designed to reduce the anticipated residual effects resulting from the Scheme to a Local level of geographic importance.
SP-003	General	In short, tackling climate change is essential, but doing it by sacrificing one of the country's most protected and valued landscapes is neither necessary nor proportionate.	The Applicant notes that these matters have been responded to in detail in the responses to this Interested Party above.

6.2 Robin Gerald Hill

Table 6-2 RR-4032

Reference	Theme	Comments/Issues Raised	Applicant's Response
RGH-001	Climate Change and Energy Need Site Selection Soils and Agriculture Transport and Access	I'm heavily in favour of green initiatives, but in the right places where they have maximum efficiency and the lowest impact on lives and the Countryside. All new builds, Commercial buildings, Government buildings Public buildings and brown field sites should have solar panels or be able to demonstrate they are doing everything they can for environmental benefits. Perhaps down the sides of train tracks. The traffic and construction implications will be massive and after 40-years or so, the land will be open to development of all kinds of things - there will be no protection for our glorious countryside. Increased flood risks.	Solar energy is at the heart of the Clean Power 2030 Mission (January 2026 revised NPS EN-3, Para 2.10.2) and it is the Government's view that a secure, reliable, affordable, net zero consistent system in 2050 is likely to be composed predominantly of wind and solar (NPS EN-1, Para 3.3.20). Sunlight, the input energy source for solar, is abundant, predictable, renewable, low carbon and free. Figure 16 of the **Statement of Need [APP-266]** and related text (Section 7.4) demonstrates that there are many viable areas of solar irradiation in the UK. Figures 28 and 29 of the **Statement of Need [APP-266**and related text (Section 8.5) demonstrate that a multi-technology approach to electricity supply, including solar, can reduce the effects of weather variability on output and is capable of closely matching a future projection of national electricity demand on a month-average level. The inclusion of a Battery Energy Storage System as part of the Scheme will enable energy generated by the Scheme to be stored and exported to the grid when it is needed, which will provide flexibility and improve grid reliability. The Applicant is confident that the proposed management and mitigation measures set out in the **ES [APP-052 to APP-265]** are comprehensive and robust and that the Scheme aligns with national and local planning policy; this is outlined in the **Planning Statement [APP-267]**. Of particular relevance are Annex A: National Policy Statement Accordance Tables and Annex B: Local Policy Accordance Tables, of the Planning Statement which set out an appraisal of the Scheme against the policies. <u>Agricultural Land</u> An assessment of the potential effects of the Scheme on soils and agricultural land is provided in **ES Volume 1, Chapter 17 Soils and Agriculture [APP-069]**. This chapter considers baseline agricultural land quality, including Best and Most

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Versatile (BMV) land, and assesses likely significant effects arising from construction, operation and decommissioning of the Scheme, together with embedded mitigation measures. The areas of each Agricultural Land Classification (ALC) grade affected by the Scheme are set out in **ES Volume 1, Chapter 17: Soils and Agriculture [APP-069]**, Section 17.7. Of the agricultural land within the Solar PV Sites, approximately 477.4 hectares (around 67%) is classified as Subgrade 3b or Grade 4 and is therefore not BMV land. There is no Grade 1 land, around 30.8 hectares (approximately 4%) of Grade 2 land, and approximately 209.3 hectares (around 29%) of Subgrade 3a land. The distribution of ALC grades is shown in **ES Volume 2, Figure 17-2: Agricultural Land Classification Mapping [APP-172]**. The Applicant has had regard to agricultural land quality in the design and site selection process and has sought, where practicable, to locate infrastructure on lower quality land. The Scheme will result in a temporary but long-term and reversible loss of agricultural land for the operational life of the Scheme. As set out in **ES Volume 1, Chapter 17: Soils and Agriculture [APP-069]**, Section 17.10, this gives rise to a temporary, long-term moderate adverse effect on agricultural land overall, and a temporary, long-term major/moderate adverse effect on BMV land, both of which are assessed as significant. These effects are fully reported in the ES and are a matter for the Secretary of State to weigh in the planning balance against the need for the Scheme and its wider benefits. There are no significant permanent effects on agricultural land, as all land will be returned to its original use and condition as far as practicable following decommissioning. The Applicant confirms that none of the land will be considered brownfield after decommissioning. The expectation is that the land will return to farming, but the Applicant cannot dictate what

Reference	Theme	Comments/Issues Raised	Applicant's Response
			will happen to the land post-decommissioning when the Applicant no longer has an interest in the land. The Applicant notes that the approach to assessing the quality of the agricultural land is under further discussion with Natural England and is set out in the relevant **Statement of Common Ground** to be submitted at Deadline 1. Measures to avoid and minimise effects on soils and agricultural land are embedded within the Scheme design and secured through the DCO. These include the preparation and implementation of a **Soil Resources Management Plan (SRMP) [APP-280]**, which will control soil handling, storage and reinstatement during construction, operation and decommissioning, and a requirement to prepare and implement a Decommissioning Strategy in accordance with the **Outline Decommissioning Strategy [APP-279]**. Through the establishment and maintenance of long-term grassland beneath and between the solar arrays, soil health, quality and structure are anticipated to improve over the lifetime of the Scheme, resulting in a temporary, moderate beneficial effect on soil resources at decommissioning, which is assessed as significant (**ES Chapter 17**, Sections 17.10 and 17.12). <u>Site Selection</u> In terms of site selection, the Applicant followed a staged approach to assessment, taking into consideration a range of planning, environmental and operational factors. **ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP-056]** and **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]** explains the methodology that has been applied when identifying and evaluating potential sites for the Scheme. It identifies a number of potential development

Reference	Theme	Comments/Issues Raised	Applicant's Response
			areas for the Scheme and presents how each of those areas perform against a range of planning, environmental and operational constraints and opportunities. This report concludes that there are no more suitable and available locations within the search area than the proposed location for the Scheme, based on the criteria identified. In relation to suggestions that brownfield land or alternative locations should be used, including rooftop, these matters are addressed in **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185], ES Volume 1, Chapter 4 Alternatives and Design Evolution** and in the **Statement of Need [APP-056 and APP-266]**. As shown in Table 2-2 of **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]**, the Applicant has considered previously developed land/ brownfield land over 1 hectare within the area of search, based on the brownfield land registers of the relevant Local Planning Authorities, and concluded that none of the sites are large enough to provide a viable land parcel of at least 40 ha and sites were not considered to be available as they have planning permission for residential development and/or are allocated for residential/mixed use development. National policy and government guidance, as set out in the **Statement of Need [APP-266]**, recognise that while rooftop and smaller-scale solar installations are an important part of the energy mix, they cannot alone meet the scale of capacity required to achieve clean power and net zero objectives. Large-scale ground-mounted solar therefore remains necessary in addition to, not instead of, rooftop solar. <u>Transport and Access</u> The potential effects of construction traffic on the local highway network are assessed in **ES Volume 1, Chapter 13: Transport**

Reference	Theme	Comments/Issues Raised	Applicant's Response
			and Access [APP-065], which considers construction vehicle movements, traffic volumes, road safety and effects on road users. This included the capacity of local roads and infrastructure to accommodate construction vehicles with consideration of construction traffic volumes, vehicle types, route suitability, and network performance. The assessment concludes that the level of construction traffic associated with the Scheme is unlikely to materially affect road safety on links within the Study Area, and no significant adverse effects on accident risk are anticipated. The assessment additionally concludes that with appropriate mitigation such as the Construction Traffic Management Plan in place to manage construction vehicle movements, there would be no significant adverse impacts on the local highway network during the construction, operation maintenance, and decommissioning phases of the Scheme. An **Outline Construction Traffic Management Plan (CTMP) [APP-287]** has been prepared and submitted with the DCO application. The aim of the CTMP is to ensure that the effect of the construction phase on the local highway network is minimised. The **Outline CTMP [APP-287]** sets out measures to coordinate construction deliveries by HGVs to arrive and depart between 09:30 and 16:30 where possible, to avoid peak network hours of 08:00–09:00 and 17:00–18:00. It also includes a community liaison element to keep local communities informed about the construction process and to provide a contact for feedback should any issues arise. Compliance with the CTMP will be monitored by the Developer, Contractor and Wiltshire Council as local highway authority.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			The preparation, approval and implementation of the final CTMP, substantially in accordance with the outline CTMP, are secured through Requirement 15 of Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring construction traffic impacts are appropriately managed throughout the construction phase of the Scheme. The potential effects of operational traffic on the local highway network are assessed in **ES Volume 1, Chapter 13: Transport and Access [APP-065]**. This chapter is supported by **ES Volume 2 Figures, including Figure 13-13: Operational Only Access Locations: Solar PV Sites [APP-158]**, and **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]**. The assessment considers day-to-day movements associated with maintenance and security of the Scheme, and for the replacement of Solar PV Panels, Conversion Units and BESS Batteries. Assumptions have been made based on similar projects, and the number of vehicle trips for replacement activities will be less than those during the construction phase. **ES Volume 1, Chapter 13: Transport and Access [APP-065]** concludes that operation and maintenance vehicle types and movements are quantified in this chapter and will not give rise to any residual significant effects, in line with relevant thresholds set out in the ISEP Guidelines 2023. Embedded mitigation measures include providing suitable access points for operation and maintenance phase vehicles with turning areas. Where replacement activities are required, measures set out in the **Outline Construction Traffic Management Plan (CTMP) [APP-287]** will be implemented as appropriate. In addition, the **Outline Public Rights of Way (PRoW) and Permissive Path Management Plan [APP-288]** includes measures, such as signage, path repairs and temporary diversions, to manage vehicle interactions with PRoW users and

Reference	Theme	Comments/Issues Raised	Applicant's Response
			minimise effects on existing users. The preparation, approval, and implementation of the CTMP and the PRoW and Permissive Path Management Plan are secured through Schedule 2, Requirements 15 and 16 respectively, of the **Draft Development Consent Order [APP-016]**. <u>Flood Risk</u> An assessment of the effects of the Scheme on flood risk both within the Site and the surrounding area is provided in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [APP-063]**, with supporting information provided in **ES Volume 3, Appendix 11-1 to 11-9: Flood Risk Assessment and Drainage Strategy [APP-210 to APP-218].** The assessment concludes that, with the embedded mitigation measures secured, the Scheme would not result in a material increase in off-site flood risk, including to adjacent communities and downstream receptors, and that any on-site flood risk would be managed such that the Scheme remains safe and operable for its lifetime. The assessment has been prepared in accordance with national policy and best practice guidance and in consultation with the Environment Agency and Lead Local Flood Authority and is set out in the relevant Statements of Common Grounds to be submitted at Deadline 1. The **Outline Construction Environmental Management Plan (CEMP) [APP-277]** has been developed to control construction-phase risks and ensure there is no material increase in off-site flood risk. In accordance with NPS EN-3 (paragraph 2.10.843.10.75).

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Requirement 13 in Schedule 2 of the **Draft DCO [APP-016]** secures that no part of the authorized development can commence until a CEMP is submitted to and approved by the relevant planning authority. The CEMP must be substantially in accordance with the Outline CEMP, and all construction works associated must be carried out in accordance with the CEMP.

6.3 Victoria Knox

Table 6-3 RR-4846

Reference	Theme	Comments/Issues Raised	Applicant's Response
VK-001	General Landscape and Visual	I object to the Lime Down Solar project due to the huge impact it will have on a ANOB.	An assessment of landscape and visual effects is provided in the Landscape and Visual Impact Assessment (LVIA) presented in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**. The LVIA assesses effects on identified landscape and visual receptors, including residential properties and users of public rights of way, and identifies where significant effects may occur. The Cotswolds National Landscape (CNL) (formally Area of Cotswolds Outstanding Natural Beauty) is fully assessed as a standalone receptor within **ES Volume 3, Appendix 8.6: Assessment of Effects on the Special Qualities of the Cotswolds National Landscape [APP-197]**. This assessment considers the effects of the Scheme on landscape character, visual amenity and the special qualities of the CNL, including tranquillity. The assessment found that there would be some short term impact to landscape character within the setting of the CNL but due to the avoidance measures embedded within the Scheme, harm to the CNL itself would be minimal with beneficial effects in the long term which would further the purposes of the designation. In respect of visual amenity, some short-term adverse effects would be experienced by a small number of visual receptors with views to and from the CNL. However, these would reduce over time as a result of the proposed mitigation. The assessment of effects on the special qualities of the CNL scoped out 3 SQs as there is no association with the Site. The assessment found that there are no direct effects on the remaining SQs. There are some Minor/ Negligible short-term effects on a small number of visual receptors within the setting of the CNL which effect SQ7 -Tranquillity and SQ13 Archaeology and historic associations. However, these effects are mitigated by Year 15 when proposed vegetation has matured. The assessment also found that there would be

Reference	Theme	Comments/Issues Raised	Applicant's Response
			beneficial effects on SQ 6 – Biodiversity and nature recovery as a result of the delivery of approximately 119.7 hectares of flower-rich neutral grassland (as defined in the BNG assessment) and SQ 12 - An accessible landscape as a result of the delivery of approximately 12.8km of new permissive paths within the setting of the CNL. The remaining SQs would remain entirely intact. The Scheme was refined through an iterative design process to avoid and reduce effects on the CNL and its setting. Panels along the edge of the CNL were removed from the Order Limits in fields C2, C3 and C4 where significant visual effects on receptors within the CNL were identified. Panels were also removed from fields C1, C6, C8, the western section of C9 and the majority of C10, with this land now proposed for ecological mitigation to protect the setting of the CNL. In addition, panels within fields A11 and A12 were removed and the land repurposed for ecological mitigation to protect the setting of the CNL towards Sherston. All land parcels adjacent to the CNL are proposed to deliver habitat enhancement, informed by the CNL Management Plan and the Cotswolds National Landscape Strategy and Guidelines, to further the purposes of the designation. Details of the proposed landscape and ecological mitigation and enhancement measures are provided in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**, **Figure 3-4-1 to 3-4-5.2 Landscape and Ecology Mitigation Plan [APP-084]** and secured in the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]** and the **Outline Ecological Protection and Mitigation Strategy (EPMS) [APP-284]**. The preparation, approval and implementation of the detailed

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Landscape and Ecological Management Plan, substantially in accordance with the **OLEMP [APP-283]**, are secured through Requirement 7 in Schedule 2 of the **Draft Development Consent Order [APP-016]**. The preparation, approval and implementation of the detailed Ecological Protection and Mitigation Strategy, substantially in accordance with the **EPMS [APP-284]**, are secured through Requirement 8 in Schedule 2 of the **Draft Development Consent Order [APP-016]**. These requirements ensure that the identified mitigation and enhancement measures are delivered and maintained throughout the lifetime of the Scheme.
VK-002	Construction and Decommissioning Air Quality Noise and Vibration Human Health	The construction process will increase the traffic in the area, impacting narrow country roads not designed to take large traffic volumes or heavy loads. The increase in traffic will also have a detrimental impact on air quality in the area, which will directly impact the health of residents on the main roads, including our (Redacted). The increased traffic will also increase noise in a very peaceful area of the Cotswolds, impacting the mental health and wellbeing of residents, who have specifically chosen to live in a secluded, peaceful area of the UK.	<u>Traffic</u> The potential effects of construction traffic on the local highway network are assessed in **ES Volume 1, Chapter 13: Transport and Access [APP-065]**, which considers construction vehicle movements, traffic volumes, road safety and effects on road users. This included the capacity of local roads and infrastructure to accommodate construction vehicles with consideration of construction traffic volumes, vehicle types, route suitability, and network performance. The assessment concludes that the level of construction traffic associated with the Scheme is unlikely to materially affect road safety on links within the Study Area, and no significant adverse effects on accident risk are anticipated. The assessment additionally concludes that with appropriate mitigation such as the Construction Traffic Management Plan in place to manage construction vehicle movements, there would be no significant adverse impacts on the local highway network during the construction, operation maintenance, and decommissioning phases of the Scheme. An **Outline Construction Traffic Management Plan (Outline CTMP) [APP-287]** has been prepared and submitted with the

Reference	Theme	Comments/Issues Raised	Applicant's Response
			DCO application. The aim of the CTMP is to ensure that the effect of the construction phase on the local highway network is minimised. The **Outline CTMP [APP-287]** secures measures to coordinate construction deliveries by HGVs to arrive and depart between 09:30 and 16:30 where possible, to avoid peak network hours of 08:00–09:00 and 17:00–18:00. It also includes a community liaison element to keep local communities informed about the construction process and to provide a contact for feedback should any issues arise. Compliance with the CTMP will be monitored by the Developer, Contractor and Wiltshire Council as local highway authority. The preparation, approval and implementation of the final CTMP, substantially in accordance with the outline CTMP, are secured through Requirement 15 of Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring construction traffic impacts are appropriately managed throughout the construction phase of the Scheme. <u>Air Quality</u> An assessment of the effects of construction activities on air quality is provided in **ES Volume 1, Chapter 15: Air Quality [APP-067]**. The assessment considers potential emissions from construction dust, construction vehicle exhausts and Non-Road Mobile Machinery (NRMM), and has been undertaken in accordance with relevant best practice guidance. Further detail on the construction dust assessment is provided in **ES Volume 3, Appendix 15-1: Construction Dust Methodology and Assessment [APP-238]**. The assessment concludes that, with embedded mitigation measures in place, construction-phase air quality effects would

Reference	Theme	Comments/Issues Raised	Applicant's Response
			not be significant. Mitigation measures to control dust and emissions during construction are secured in the **Outline Construction Environmental Management Plan [APP-277]** and the **Outline Construction Traffic Management Plan [APP-287]**. These include measures such as dust suppression, site management controls, routing and scheduling of construction traffic, and management of plant and machinery. The preparation, approval and implementation of detailed construction management plans, substantially in accordance with the outline plans, are secured through Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that air quality impacts during construction are appropriately controlled. <u>Noise and Vibration</u> The Applicant has assessed the impacts of construction noise and operational noise from the Scheme in **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**, which demonstrates that estimated construction noise levels at residential property are no greater than the SOAEL, indicating that while an adverse effect is likely to be experienced, it is not anticipated to be significant. This assessment outcome has been directly translated to assumptions on the likely effects to human health as a result of noise and vibration in **ES Volume 1, Chapter 18: Human Health [APP-070].** While it is considered likely that the construction of the Scheme will have up to a moderate-minor adverse effect on residential properties closest to construction routes and construction works areas, this is expected to be a medium-term temporary effect, and therefore is not a significant, nor long-term effect.

Reference	Theme	Comments/Issues Raised	Applicant's Response
VK-003	Landscape and Visual	Due to this, and the visual impact the project will have on the area, I strongly object to the proposal.	An assessment of landscape and visual effects is provided in the Landscape and Visual Impact Assessment (LVIA) presented in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**. The LVIA assesses effects on identified landscape and visual receptors, including residential properties and users of public rights of way, and identifies where significant effects may occur. The LVIA found no significant long term visual effects to Residential Properties as a consequence of the Scheme. The scale of development within the Order Limits has been significantly reduced from the layout assessed in the Preliminary Environmental Information Report (PEIR) through an iterative design process undertaken in response to consultation and in accordance with the mitigation hierarchy to avoid, reduce and mitigate adverse effects. As part of this design evolution, panels along the edge of the Cotswolds National Landscape and along the Fosse Way have been removed. Mitigation measures to address landscape and visual effects are set out in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**, **Figure 3-4-1 to 3-4-5.2 Landscape and Ecology Mitigation Plan [APP-084]** and secured within the **Outline Landscape and Ecological Mitigation Plan (LEMP) [APP-283]** and the **Outline Ecological Protection and Mitigation Strategy (EPMS) [APP-284]**. These documents include proposals for new and enhanced planting, retention of existing hedgerows and woodland, and landscape integration measures to reduce visual effects over time. In addition, the Scheme design incorporates minimum offsets from existing landscape features, including residential properties, ancient woodland, woodland, hedgerows, public

Reference	Theme	Comments/Issues Raised	Applicant's Response
			rights of way and watercourses, to further limit visual impacts. Although these measures reduce the effects of the Scheme on nearly all receptors, as noted above there are 10 receptors which would experience Significant Visual Effects for the duration of the Scheme as set out Table 8-30 of **ES Volume 1, Chapter 8: Landscape and Visual [APP-060].** Mitigation measures to address landscape and visual effects are set out in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**, **Figure 3-4-1 to 3-4-5.2 Landscape and Ecology Mitigation Plan [APP-084]** The preparation, approval and implementation of detailed landscape and ecological management plans, substantially in accordance with the **OLEMP [APP-283]** and **EPMS [APP-284]**, are secured through requirements in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that the identified mitigation measures are delivered and maintained throughout the lifetime of the Scheme.

6.4 Joel Knox

Table 6-4 RR-2329

Reference	Theme	Comments/Issues Raised	Applicant's Response
JK-001	Landscape and Visual Soils and Agriculture	I object to the proposed solar farm primarily due to its inappropriate location within the Cotswolds Area of Outstanding Natural Beauty (AONB). This large-scale industrial development would cause significant harm to a nationally protected landscape, contrary to the purpose of AONB designation and national planning policy. The site also comprises high-quality arable land, the loss of which is unjustified given its agricultural value.	The Cotswolds National Landscape (CNL) (Area of Outstanding Natural Beauty) is fully assessed as a standalone receptor within **ES Volume 3, Appendix 8.6: Assessment of Effects on the Special Qualities of the Cotswolds National Landscape [APP-197]**. This assessment considers the effects of the Scheme on landscape character, visual amenity and the special qualities of the CNL, including tranquillity. The assessment found that there would be some short term impact to landscape character within the setting of the CNL but due to the avoidance measures embedded within the Scheme, harm to the CNL itself would be minimal with beneficial effects in the long term which would further the purposes of the designation. In respect of visual amenity, some short-term adverse effects would be experienced by a small number of visual receptors with views to and from the CNL. However, these would reduce over time as a result of the proposed mitigation. The assessment of effects on the special qualities of the CNL scoped out 3 SQs as there is no association with the Site. The assessment found that there are no direct effects on the remaining SQs. There are some Minor/ Negligible short-term effects on a small number of visual receptors within the setting of the CNL which effect SQ7 -Tranquillity and SQ13 Archaeology and historic associations. However, these effects are mitigated by Year 15 when proposed vegetation has matured. The assessment also found that there would be beneficial effects on SQ 6 – Biodiversity and nature recovery as a result of the delivery of approximately 119.7 hectares of flower-rich neutral grassland (as defined in the BNG assessment) and SQ 12 - An accessible landscape as a result of the delivery of approximately 12.8km of new permissive paths within the setting of the CNL. The remaining SQs would remain entirely intact. The Scheme was refined through an iterative design process to avoid and reduce effects on the CNL and its setting. Panels along

Reference	Theme	Comments/Issues Raised	Applicant's Response
			the edge of the CNL were removed from the Order Limits in fields C2, C3 and C4 where significant visual effects on receptors within the CNL were identified. Panels were also removed from fields C1, C6, C8, the western section of C9 and the majority of C10, with this land now proposed for ecological mitigation to protect the setting of the CNL. In addition, panels within fields A11 and A12 were removed and the land repurposed for ecological mitigation to protect the setting of the CNL towards Sherston. All land parcels adjacent to the CNL are proposed to deliver habitat enhancement, informed by the CNL Management Plan and the Cotswolds National Landscape Strategy and Guidelines, to further the purposes of the designation. Details of the proposed landscape and ecological mitigation and enhancement measures are provided in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**, **Figure 3-4-1 to 3-4-5.2 Landscape and Ecology Mitigation Plan [APP-084]** and secured within the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]** and the **Outline Ecological Protection and Mitigation Strategy (oEPMS) [APP-284]**. The preparation, approval and implementation of the detailed Landscape and Ecological Management Plan, substantially in accordance with the **OLEMP [APP-283]**, are secured through Requirement 7 in Schedule 2 of the **Draft Development Consent Order [APP-016]**. The preparation, approval and implementation of the detailed Ecological Protection and Mitigation Strategy, substantially in accordance with the **OEPMS [APP-284]**, are secured through Requirement 8 in Schedule 2 of the **Draft Development Consent Order [APP-016]**. These requirements ensure that the identified mitigation and enhancement measures are delivered and maintained throughout

Reference	Theme	Comments/Issues Raised	Applicant's Response
			the lifetime of the Scheme. An assessment of the potential effects of the Scheme on soils and agricultural land is provided in **ES Volume 1, Chapter 17: Soils and Agriculture [APP-069]**. This chapter considers baseline agricultural land quality, including Best and Most Versatile (BMV) land, and assesses likely significant effects arising from construction, operation and decommissioning of the Scheme, together with embedded mitigation measures. The areas of each Agricultural Land Classification (ALC) grade affected by the Scheme are set out in **ES Chapter 17**, Section 17.7. Of the agricultural land within the Solar PV Sites, approximately 477.4 hectares (around 67%) is classified as Subgrade 3b or Grade 4 and is therefore not BMV land. There is no Grade 1 land, around 30.8 hectares (approximately 4%) of Grade 2 land, and approximately 209.3 hectares (around 29%) of Subgrade 3a land. The distribution of ALC grades is shown in **ES Volume 2, Figure 17-2: Agricultural Land Classification Mapping [APP-172]**. The Applicant has had regard to agricultural land quality in the design and site selection process and has sought, where practicable, to locate infrastructure on lower quality land. The Scheme will result in a temporary but long-term and reversible loss of agricultural land for the operational life of the Scheme. As set out in **ES Volume 1, Chapter 17: Soils and Agriculture [APP-069]**, Section 17.10, this gives rise to a temporary, long-term moderate adverse effect on agricultural land overall, and a temporary, long-term major/moderate adverse effect on BMV land, both of which are assessed as significant. These effects are fully reported in the ES and are a matter for the Secretary of State to weigh in the planning balance against the need for the Scheme and its wider benefits. There are no significant permanent effects on agricultural land, as all land will

Reference	Theme	Comments/Issues Raised	Applicant's Response
			be returned to its original use and condition as far as practicable following decommissioning. The Applicant notes that the approach to assessing the quality of the agricultural land is under further discussion with Natural England and is set out in the relevant **Statement of Common Ground** to be submitted at Deadline 1. Measures to avoid and minimise effects on soils and agricultural land are embedded within the Scheme design and secured through the DCO. These include the preparation and implementation of a **Soil Resources Management Plan (SRMP) [APP-280]**, which will control soil handling, storage and reinstatement during construction, operation and decommissioning, and a requirement to prepare and implement a Decommissioning Strategy in accordance with the **Outline Decommissioning Strategy [APP-279]**. Through the establishment and maintenance of long-term grassland beneath and between the solar arrays, soil health, quality and structure are anticipated to improve over the lifetime of the Scheme, resulting in a temporary, moderate beneficial effect on soil resources at decommissioning, which is assessed as significant (**ES Volume 1, Chapter 17: Soils and Agriculture,** Sections 17.10 and 17.12).
JK-002	Transport and Access	The development would have serious transport and construction impacts on the nearby village of Grittleton, through which construction traffic and heavy goods vehicles would be routed. The village's narrow, historic roads are unsuitable for such traffic, and any required road alterations would further damage the character of this heritage	The roads in the vicinity of Grittleton along the construction route will serve the construction of Lime Down A-C . These roads are suitable for use as a construction route given the level of construction traffic and road widths. The likely level of construction traffic and road width overview along this route is summarised below - • the average number of HGV construction movements along the Route to Lime Down A-C route is only 32 per

Reference	Theme	Comments/Issues Raised	Applicant's Response
		settlement. Increased construction traffic would significantly harm residential amenity, road safety and the quiet rural environment that residents value, particularly for young families and children. For these reasons, the proposal would result in unacceptable landscape, agricultural, transport and community impacts and should be refused.	day/7 per hour/one every 8 minutes (less than the journey time along the route); • low level of existing HGVs on the route to Lime Down A-C means two HGV's less likely, (the average number of existing HGV movements is only 20 per day, with some of these movements occurring outside of proposed construction hours set out in the **Outline Construction Traffic Management Plan (Outline CTMP) [APP-287]**. • Road widths outside of the order limits are wide enough for at least a car and HGV to pass; and • Any widening works required in the highway within the order limits are minor and would benefit existing users of these routes The **ES Volume 1, Chapter 13: Transport and Access [APP-065]** provides an assessment of the construction impact on highway network and its users and concludes that there is a non-significant impact on: • Road vehicle driver and passenger delay • Non-motorised user delay • Non-motorised amenity • Fear and intimidation on and by road users • Road user and pedestrian safety • Hazardous/large loads As set out in the **Outline CTMP [APP-287]** a booking system will be set up to manage arrivals and departures to the Site. This will prevent HGVs generated by the Scheme passing each other in opposite directions on the local roads forming part of the construction routes (including this route) and will be confirmed as part of the final CTMP.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			The **Outline CTMP [APP-287]** includes measures to manage deliveries and restricted hours of deliveries outside of peak hours in order to minimise any detrimental impacts on the local highway network. Construction traffic would be temporary with the whole construction period being 2 years but individual phases shorter than this depending on the final construction programme. The construction traffic is managed through a Final CTMP which is secured via a requirement of the DCO. Road condition surveys will ensure any damage to the highway network caused by construction traffic is rectified and secured in the **Outline CTMP [APP-287]** . The Applicant confirms that detailed responses in respect of landscape, agricultural and community impacts are set out above.

6.5 James Howarth

Table 6-5 RR-2050

Reference	Theme	Comments/Issues Raised	Applicant's Response
JH-001	General	The countryside around Grittleton is defined by open agricultural fields, hedgerows, long views and a strong sense of tranquillity. I am a resident of Grittleton, a small rural village located within the area affected by the Lime Down Solar Park both during construction and the long term.	The Applicant notes this comment and has responded to these points in detail in the Applicant's responses provided below.
JH-002	Transport and Access Socio-Economics, Tourism and Recreation	I have a young family and we use the local countryside and road network on a daily basis as residents taking family walks or cycles together. The lanes around Grittleton, including Alderton Road, are narrow, rural roads with limited visibility and no pavements in places. In addition to my family they are heavily used by walkers, horse riders and cyclists, including cyclists using a National Cycle Network route that runs through this area.	Please see the response above. **ES Volume 1, Appendix 13-1: Transport Assessment [APP-065]** at 13.10.42 assess the impact on Non-motorised user delay and amenity, including Fear and Intimidation and concluded a minor adverse temporary impact and therefore non significant. <u>NMU Delay</u> NMU delay is considered negligible given there is no existing pedestrian or cycle infrastructure on the construction routes and likely low numbers of existing NMU users. It is anticipated that PRoW which cross the Order Limits will generally remain open during the construction phase of the Scheme. There may be some slight perceptible delay to NMU movement if a construction vehicle is crossing a PRoW within the Order Limits. An **Outline PRoW and Permissive Path Management Plan (oPROWPPMP) [APP-282]** forms an embedded mitigation and will provide measures to ensure the effects of the construction phase on PRoW users is minimised. The **oPROWPPMP [APP-282]** contain specific measures for the temporary diversion of footpath WT|GRIT|20 and bridleway WT|MALW|54, where access to Cable Route Corridor works east of Grittleton, and HGV access to Lime Down E are taken respectively. These diversions are proposed to ensure unreasonable effects to PROW users are not experienced during construction, replacement, and decommissioning.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			NMU Amenity Pedestrian amenity is broadly defined as the relative pleasantness of a journey, and is considered to be affected by traffic flow, traffic composition and pavement width/separation from traffic. The construction routes on the road network have little existing pedestrian infrastructure and no footways, making them already unattractive as walking routes with no pedestrian amenity so this cannot be assessed. Fear and Intimidation for other NMU's can be assessed. Highway widths of construction routes have been assessed **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]** and provide sufficient width for HGV traffic to comfortably pass cyclists. Mitigation An **OCTMP [APP-287]** supports the DCO Application and presents outline measures which restrict construction deliveries to the proposed construction routes and separates the public and recreational users from hazards, including, traffic management measures such as signage and banksmen, fencing, and dust and noise control. The Applicant confirms that consideration of impacts to PROWs, unsurfaced roads, and the recreational use of the highway network has been assessed in **ES Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** and the supporting **ES Volume 3 Appendix 16-2 Tourism and Recreation Receptor Tables [APP-241]**. The Applicant confirms that the majority of significant adverse effects can be mitigated, however understands that some significant adverse effects to users of routes in Lime Down E or regionally important long-distance recreational routes cannot be mitigated further during construction, and as such will have to be considered as part of

Reference	Theme	Comments/Issues Raised	Applicant's Response
			the planning balance in determining whether or not consent should be granted. The assessment has considered the impacts to individual routes to build a picture of the likely impact on the overall PROW and highway network, determining that the overall effects within the 2 km Study Area is not a significant adverse effect at any stage of the Scheme. This is largely owing to the large number of PROWs and rural routes, given a great level of optionality to users, even in the presence of the Scheme. The Applicant has assessed the likely effects on The Wiltshire Way in **ES Volume 3 Appendix 16-2 Tourism and Recreation Receptor Tables [APP-241]**. This assessment considers transport matters (safety and delay) but also user experience, amenity and desirability. As a result of the Scheme, and the implementation of mitigation measures to protect cyclist on this route, the Scheme is anticipated to generate a significant adverse effect to users of the Wiltshire Way during construction and decommissioning. The Scheme is however not anticipated to generate any long-term significant adverse effect on users of The Wiltshire Way during the Scheme's operational phase. The mitigation measures include providing banksmen and speed limits where accesses interact with PROWs and The Wiltshire Way, and through specifying HGV access routes to the Scheme. These are secured through the **Outline CTMP [APP-287]** and **Outline PROWPPMP [APP-282]** by Requirements 15 and 16 respectively in Schedule 2 to the **Draft DCO [APP-016]**.
JH-003	Description and DCO Process Landscape and Visual	I am not opposed to renewable energy in principle. However, I object to this proposal because its scale, delivery method and location would fundamentally alter the character of the countryside around Grittleton forever and impose significant harm on residents, with no meaningful local benefit.	The Scheme has been designed to deliver the greatest possible benefit from the available land and the available grid connection, whilst avoiding, minimising and/or mitigating harmful environmental effects. As per the description set out in **ES Volume 1, Chapter 3: The Scheme [APP-055]** the total area within the DCO Order Limits encompasses approximately 1,237 hectares (ha). Of this, the 'Solar PV Sites' comprise approximately 749.1 ha of land. Around

Reference	Theme	Comments/Issues Raised	Applicant's Response
			479.5 ha of this land is proposed as being required for installation of solar PV, battery storage, and associated infrastructure. The remaining 269.5 ha would provide areas dedicated to ecological mitigation, measurable Biodiversity Net Gain (BNG) delivery, landscaping, offsets and agricultural land managed for environmental enhancement and habitat creation. The Applicant remains committed to delivering a Scheme that makes a meaningful contribution to the UK's transition to net zero, while also seeking to minimise adverse impacts and maximise opportunities for environmental enhancement and community benefits. An assessment of landscape and visual effects is provided in the Landscape and Visual Impact Assessment (LVIA) presented in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**. The LVIA assesses effects on identified landscape and visual receptors, including residential properties and users of public rights of way, and identifies where significant effects may occur. The LVIA found no significant long term visual effects to Residential Properties as a consequence of the Scheme. The scale of development within the Order Limits has been significantly reduced from the layout assessed in the Preliminary Environmental Information Report (PEIR) through an iterative design process undertaken in response to consultation and in accordance with the mitigation hierarchy to avoid, reduce and mitigate adverse effects. As part of this design evolution, panels along the edge of the Cotswolds National Landscape and along the Fosse Way have been removed. In addition, the Scheme design incorporates minimum offsets from existing landscape features, including residential properties, ancient woodland, woodland, hedgerows, public rights of way and watercourses, to further limit visual impacts.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Mitigation measures to address landscape and visual effects are set out in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**, **Figure 3-4-1 to 3-4-5.2 Landscape and Ecology Mitigation Plan [APP-084]** and secured within the **Outline Landscape and Ecological Mitigation Plan (LEMP) [APP-283]** and the **Outline Ecological Protection and Mitigation Strategy (EPMS) [APP-284]**. These documents include proposals for new and enhanced planting, retention of existing hedgerows and woodland, and landscape integration measures to reduce visual effects over time. The preparation, approval and implementation of detailed landscape and ecological management plans, substantially in accordance with the **OLEMP [APP-283]** and **EPMS [APP-284]**, are secured through requirements in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that the identified mitigation measures are delivered and maintained throughout the lifetime of the Scheme. The Applicant acknowledges that any adverse effects from the Scheme are more likely to be felt locally than the largely wider-scale benefits of the Scheme. The Scheme is anticipated to help meet the UK's net zero requirements for energy production, which is considered a critical national priority and set out in National Policy Statements for Energy NPS EN-1 (section 4.2) and EN-3. This therefore will benefit the national population rather than just the local population. The Scheme is also anticipated to benefit the population within approximately 20km of the Scheme, through providing employment and income especially during construction and peak replacement activities, and providing skills and training opportunities. Where the Scheme is anticipated to benefit local people more

Reference	Theme	Comments/Issues Raised	Applicant's Response
			specifically, this is done through providing onsite permissive paths to increase access to the countryside, providing improved landscape planting through reinforcing existing hedgerows and planting of new trees, providing biodiversity net gains through habitat improvements. That notwithstanding, the Applicant is committed to providing a Community Benefit Fund to allow for community-driven benefits that are not necessarily associated with the Scheme itself. The purpose is to establish a means to recognise local community needs that the Applicant wants to be able to contribute towards in recognition of the local impact of the Scheme. The Community Benefit Fund is separate from the DCO process, and so is not bound to the same timescales or information requirements as submitted information. Furthermore, community benefits are legally immaterial to planning decisions and cannot be considered when deciding whether to grant planning consent. The Applicant acknowledges this and so has sought to provide the Community Benefit Fund voluntarily even though it won't add favourable weight in the planning balance.
JH-004	General	The countryside around Grittleton is defined by open agricultural fields, hedgerows, long views and a strong sense of tranquillity. I am a resident of Grittleton, a small rural village located within the area affected by the Lime Down Solar Park both during construction and the long term.	The Applicant notes this comment and has responded to these points in detail in the Applicant's responses provided below.

6.6 Anna Pitt

Table 6-6 RR-0345

Reference	Theme	Comments/Issues Raised	Applicant's Response
AP-001	Socio-Economics, Tourism and Recreation Landscape and Visual Human Health	Dear Sirs Thank you for the opportunity to register my feedback on the proposed Lime Down Scheme. Let me start this feedback by saying that personally, having installed a solar scheme of 64 panels in the field attached to our home, we are clearly not opposed to using solar panels to generate clean energy. In fact, patently, quite the opposite. As a resident of Norton, I have five major concerns regarding this scheme. The first is that our tiny Norton village is going to be surrounded and drowning in fields of solar panels. Where are the open spaces for people to enjoy going for a walk or cycle ride? This development is overwhelmingly concentrated in the immediate village area, it will completely ruin the quality of the lives of the people living in the village and doesn't take into account their mental health as a consequence of living in an enclosed area of steel panels.	The Applicant has sought to minimise impacts upon neighbouring properties and amenity through the mitigation measures secured by requirements in Schedule 2 to the **Draft DCO [APP-016]**. Specifically at Norton, this has included ensuring the Scheme design at Lime Down B is buffered considerably from residential buildings in Norton (around The Vine Tree and church) to minimise visual impacts, while traffic impacts are mitigated through the use of a haul route parallel to the Fosse Way to access Lime Down B for construction, rather than using the local highway network through Norton, and the use of traffic mitigation measures to reduce impacts on the Norton-Hullavington road. These measures seek to mitigate against significant effects to residents and to visitors. Construction vehicle movements will be managed through a Construction Traffic Management Plan. An **Outline Construction Traffic Management Plan (Outline CTMP) [APP-287]** has been prepared and submitted with the DCO application. The aim of the CTMP is to ensure that the effect of the construction phase on the local highway network is minimised. The **Outline CTMP [APP-287]** sets out measures to coordinate construction deliveries by HGVs to arrive and depart between 09:30 and 16:30 where possible, to avoid peak network hours of 08:00–09:00 and 17:00–18:00. It also includes a community liaison element to keep local communities informed about the construction process and to provide a contact for feedback should any issues arise. Compliance with the CTMP will be monitored by the Developer, Contractor and Wiltshire Council as local highway authority. The preparation, approval and implementation of the final CTMP, substantially in accordance with the outline CTMP, are secured through Requirement 15 of Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring construction

Reference	Theme	Comments/Issues Raised	Applicant's Response
			traffic impacts are appropriately managed throughout the construction phase of the Scheme. Mitigation measures to address landscape and visual effects are set out in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**, **Figure 3-4-1 to 3-4-5.2 Landscape and Ecology Mitigation Plan [APP-084]** and secured within the **Outline Landscape and Ecological Mitigation Plan (OLEMP) [APP-283]** and the **Outline Ecological Protection and Mitigation Strategy (OEPMS) [APP-284]**. The preparation, approval and implementation of detailed landscape and ecological management plans, substantially in accordance with the **OLEMP [APP-283]** and **OEPMS [APP-284]**, are secured through requirements in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that the identified mitigation measures are delivered and maintained throughout the lifetime of the Scheme. The Applicant understands the importance of PROWs for recreation and their benefit to physical and mental wellbeing. Whilst the user experience will be different to current conditions, the planting of landscape and ecological mitigation, and the provision of permissive paths to improve connectivity is anticipated to go a substantial way to improve user experience and maintain the number of users of the affected PROWs. These measures are shown on **ES Volume 2, Figures 3-4-1 to 3-4-5.2 [APP-084]** and secured through the **OLEMP [APP-283]**. Protection and maintenance of public rights of way on the Scheme is controlled through the **OPROWPPMP [APP-282]**. These documents, and the mitigation measures they contain, are secured by Requirements 7 and 16 respectively in Schedule 2 to the **Draft DCO [APP-016]**. Furthermore, the likely effects from the Scheme on communities

Reference	Theme	Comments/Issues Raised	Applicant's Response
			with respect to access to the countryside and open space for recreation, and to social changes and community wellbeing have been assessed in **ES Volume 1, Chapter 18: Human Health [APP-070]** under the headings 'open space, leisure and play' and 'community identity, culture, resilience and influence'. This assessment has considered access to the countryside, physical health from environmental changes, and community wellbeing and mental health through assessment of changes to community sense of place and community pride and character. The assessment finds no significant adverse effects to health and wellbeing at any phase of the Scheme.
AP-002	Hydrology, Flood Risk and Drainage	The second concern is flooding. The proposed Lime Down plan has a mass of fields of solar panels starting just two small fields behind our home. Our home is on a significant slope right above the Splash ford. When it rains, all the water in the area behind our home drains into the ford, including from the fields. Currently, the water from the fields behind our property is able to drain successfully through piping laid under our field and home and to date, our home has never flooded. However, the heavy rains in in the past couple of years have had the ground water so high that the garden behind our home was pooled with water. Lime Down solar panels in the fields behind our home are expected to massively exacerbate this problem with sheets of water running off the panels not having time to soak into the land underneath them and drain into the land. I anticipate flooding of our home. I have	The Applicant acknowledges the concern regarding existing surface water and groundwater conditions in the vicinity of the Splash ford, including pooling in gardens during recent wet periods. The assessment in **Environmental Statement Volume 1, Chapter 11 Hydrology, Flood Risk and Drainage [APP-063]** considers baseline drainage pathways and the mechanisms by which the Scheme could influence runoff generation and flow routing, including during extreme rainfall events, and concludes that the Scheme would not increase flood risk elsewhere, including residential properties The Applicant does not agree that solar PV panels would give rise to *sheets of water*" that cannot soak into the ground or that the Scheme would materially increase runoff to the ford or increase flood risk at nearby properties. The solar PV arrays are elevated and distributed, with drip gaps and rainfall draining to ground beneath and between panels rather than being conveyed as concentrated surface flow. This accords with NPS EN-3 paragraph 3.10.75, which recognises that ground-mounted solar PV generally drains to ground and does not create significant drainage impacts where ground cover is maintained. Embedded mitigation includes establishment and management of permanent grass cover, which supports infiltration and reduces erosion relative to the existing arable baseline. Scheme-specific drainage

Reference	Theme	Comments/Issues Raised	Applicant's Response
		contacted Lime Down during the consulting period regarding the same but have had no reply and flooding has not been properly addressed in their proposal.	controls are secured through Requirement 11 of the **Draft Development Consent Order [APP-016].** Construction-phase controls to manage temporary drainage, protect existing field drainage, and prevent mobilisation of sediment are set out in the **Outline Construction Environmental Management Plan [APP-277]** and secured through the **Draft Development Consent Order [APP-016]**, with detailed construction arrangements approved through the discharge process. On this basis, the assessment concludes there would be no significant adverse effects on hydrology, flood risk and drainage receptors. The Applicant confirms that feedback was received from this party by email on 04/03/2025 during the statutory consultation period. This representation was considered and responded to in **Consultation Report Appendices – Appendix F-7 Statutory Consultation under Section 47 [APP-040]**, under the unique reference **LD2_CLE_068.** An assessment of the effects of the Scheme on flood risk both within the Site and the surrounding area is provided in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [APP-063]**, with supporting information provided in **ES Volume 3, Appendix 11-1 to 11-9: Flood Risk Assessment and Drainage Strategy [APP-210 to APP-218].**
AP-003	Hydrology, Flood Risk and Drainage Soils and Agriculture	My third concern is the tenant farmers who form a longstanding (some of several generations) part of our community. Not only will they lose their livelihoods but this country as a whole will lose the food production from these farms. Our community will also lose all the additional contributions the farmers make to the area. These include but not	The Applicant confirms that land agreements are being made with landowners who have their own contractual arrangements with tenant farmers. This may therefore involve the termination of agricultural tenancies at the discretion of the landowner. The Applicant is, however, cognisant of the impact this may have and so seeks to source ways of retaining agricultural workers, providing reskilling opportunities, or providing re-employment as supported by the measures secured in the **Outline Skills,**

Reference	Theme	Comments/Issues Raised	Applicant's Response
		exclusively, the digging out and clearing of ditches on the sides of the roads to help with flooding in the area, clearing trees blown down by storms etc etc. Overall, a significant loss to our communities.	**Supply Chain and Employment Plan [APP-285]**. The potential effects of the Scheme on agricultural land are assessed in **ES Volume 1, Chapter 17 Soils and Agriculture [APP-069]**, which considers baseline agricultural land use and quality and evaluates likely effects during construction, operation and decommissioning. The assessment confirms that the Scheme will result in a temporary and reversible loss of agricultural land during the operational period, with all land to be returned to its original use and condition as far as practicable following decommissioning. No permanent loss of agricultural land is anticipated. Government-led agricultural initiatives, such as the Sustainable Farming Incentive which is relaunching later in 2026, have prioritised soil health, environmental enhancement and climate resilience, recognising that long-term food security is influenced by a range of factors beyond land take alone, including soil condition, climate change and environmental pressures. The Scheme allows soils to remain in situ and undisturbed during operation, supporting soil recovery and long-term land health, with land reinstated and returned to agricultural use as far as practicable following decommissioning. No permanent loss of agricultural land is anticipated. The Applicant does not consider that food security will be compromised by the Scheme (or solar energy more widely). The latest figures to September 2024 indicate that solar occupied around 21,200 ha of agricultural land in the UK. In 2025, 545,000 ha of arable land in England were left uncropped (source: Department for Environment, Food & Rural Affairs, Agricultural land use in England at 1 June 2025). It should also be noted that food security is not identified as an issue within the suite of Energy National Policy Statements or the National Planning Policy Framework (NPPF).

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Further, the Government's UK Solar Roadmap (2025) states that solar development is not considered to compromise food security, but that the climate and nature crisis poses the greatest long-term risk to food security- a risk which the Scheme directly helps to address by providing a secure, low-carbon source of electricity. As set out in Section 2 of the **Outline Decommissioning Strategy [APP-279],** post-decommissioning of the Scheme, the landowners would choose how the land is to be used and managed. The landowner may return all of the land to arable use, although it is likely that established habitats such as hedgerows and woodland would be retained given their potential benefits to agricultural land and the wider farming estate. The Applicant notes that local farmers currently undertake routine maintenance of field drains and drainage ditches as part of normal agricultural land management. The hydrology and flood risk assessment presented in **Environmental Statement Volume 1, Chapter 11 Hydrology, Flood Risk and Drainage [APP-063]** concludes that the Scheme would not increase runoff rates or volumes leaving the Site. As such, the Scheme would not be expected to increase the need for roadside ditch maintenance beyond existing baseline conditions, and drainage features within the Order Limits would continue to be managed as part of routine operational land management.
AP-004	Socio-Economics, Tourism and Recreation	My fourth concern is that a number of country hospitality businesses around this area survive on the busy time during the tourist season. Why would tourists elect to spend time visiting an industrial complex. These businesses are likely to fail. Similarly, the stud	The potential effects of the Scheme on tourism and recreation are assessed in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]**, supported by **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]**. The assessment considers baseline tourism activity, visitor attractions, recreational assets and tourism-dependent businesses within the study area.

Reference	Theme	Comments/Issues Raised	Applicant's Response
		farms in the area will not survive given the issues around horses and solar.	The assessment evaluates potential effects on the use, enjoyment and desirability of nearby tourism destinations, including impacts on individual visitor attractions, recreational routes, events and businesses reliant on tourism. It also considers whether changes to landscape character or visual amenity could influence visitor behaviour. The assessment identifies a worst-case scenario in which a temporary loss of up to 50 tourism-related jobs could occur locally during construction, and a long-term loss of up to 11 tourism-related jobs could occur during the operational phase of the Scheme. This represents a precautionary estimate based on conservative assumptions. The assessment concludes that, while some localised effects on tourism receptors are anticipated to occur, significant adverse effects on the wider tourism economy are not anticipated. These findings are fully reported in the ES and will be weighed in the planning balance alongside the Scheme's wider economic and environmental benefits. The Applicant notes that the approach to assessment of tourism impacts is under discussion with Wiltshire Council's Economic and Regeneration Team and is set out in the Statement of Common Ground with Wiltshire Council to be submitted at Deadline 1. Equestrian facilities, including private stables, paddocks, stud farms, riding schools, have been considered as specific recreational receptors within **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]**. The likely effects on these receptors are individually assessed in **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]**, which consider impacts from construction activities, traffic, impacts on nearby PROWs and changes in

Reference	Theme	Comments/Issues Raised	Applicant's Response
			views and landscape character. With the exception of Park Farm, Yatton Keynell (the equestrian facilities of which are likely to be directly affected by cable route construction) assessment identifies that, with embedded mitigation in place, including construction traffic management, embedded design measures to offset infrastructure from highways and public rights of way, and site-specific safety measures for cabling works, no significant residual effects on the operation or use of equestrian facilities are expected, subject to implementation of the committed mitigation measures. The effect on Park Farm, Yatton Keynell has been fully reported in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** and its supporting appendix **[APP-241]** will be weighed in the planning balance alongside the Scheme's wider economic and environmental benefits.
AP-005	Transport and Access	Finally, anyone who has driven around this area will have noticed that the roads are mostly narrow lanes and the edges are in a critically bad condition. The traffic into and through the villages is already challenging at times of the day but this development would create a traffic nightmare for locals (and the developers). A stream of heavy vehicles will also likely destroy what is, to a greater extent, a crumbling road infrastructure in the area.	The capacity of local roads and infrastructure to accommodate construction vehicles is assessed in **ES Volume 1, Chapter 13: Transport and Access [APP-065]**, which considers construction traffic volumes, vehicle types, route suitability and network performance. The assessment concludes that, with appropriate mitigation in place, there would be no significant adverse impacts on the local highway network. Supporting technical information is provided in **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]**, which identifies specific locations where traffic management measures or passing arrangements may be required on narrower sections of construction routes. The assessment presented in Annex H of **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]** demonstrates adequate carriageway width or frequency of passing place opportunity to pass at least an HGV and a light vehicle as requested in comments provided by Wiltshire Council.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			All construction routes also include passing points to allow two HGVs to pass. Mitigation measures to manage construction traffic are set out in the **Outline Construction Traffic Management Plan (CTMP) [APP-287]**. The **CTMP [APP-287]** is designed to minimise the effects of construction traffic on local roads and includes measures for vehicle routing, delivery scheduling and liaison with the local highway authority. A road condition and dilapidation survey of minor roads not typically used by HGV traffic is included as a measure within the CTMP. Any damage to verges or carriageway surfaces caused by construction vehicles will be rectified to the satisfaction of the local highway authority. The preparation, approval and implementation of the final CTMP, substantially in accordance with the **Outline CTMP [APP-287]**, are secured through Requirement 15 of Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring construction traffic impacts on local roads and infrastructure are appropriately managed throughout the construction phase of the Scheme.

6.7 Mr David Akerman

Table 6-7 RR-3267

Reference	Theme	Comments/Issues Raised	Applicant's Response
MDA-001	Site selection and Alternatives Transport and Access	I object to the lime down proposal for these reasons The project is too large for a site so far from the electricity distribution unit The construction of the new site will greatly impact the local area as the country lanes are not suitable for the huge transporters of the massive equipment. The value of houses in the locality will be significantly reduced as they will be unsaleable. The position of this project envelopes the historic Fosse Way.	The Applicant confirms that the existing National Grid Melksham substation has been identified as the point of connection. This decision was based on available capacity, network resilience, and strategic grid planning. As explained in **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]**, an initial search area was identified at a 5 km radius from the POC, however this was later expanded as no suitable and available sites within 5 km were identified. The search area was enlarged incrementally to a 20 km radius which is considered by the Applicant to be a viable cable connection distance for a solar project of this scale. The POC and 20 km search area is shown on Figure 1, Annex C of **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]**. Further, from an operational perspective, high voltage electricity transmission at 400kV in this case, is specifically designed to minimise energy losses over long distances. As such, the approximate 20km distance involved results in negligible losses. More details on how the Cable Route Corridor has been located and designed can be found in **ES Volume 1, Chapter 4 Alternatives and Design Evolution [APP-056]**. Several factors were considered designed to take a direct route whilst following existing features, such as roads, and avoiding sensitive receptors as far as practicable, such as habitat designations, residential and commercial properties, heritage assets, and a large number of land interests. The assessments set out in the various chapters of the **ES [APP-052 to APP-265]** detail what impacts are expected as a result of the Scheme based on the minimum and maximum parameters of the Scheme, and the mitigation and enhancement measures that are proposed to reduce these impacts. The effects of construction traffic on the local highway network

Reference	Theme	Comments/Issues Raised	Applicant's Response
			are assessed in **ES Volume 1, Chapter 13: Transport and Access [APP-065]**, which considers construction vehicle routing, traffic volumes and potential impacts on highway safety and road condition. The assessment concludes that, with appropriate management measures in place, construction traffic effects can be appropriately controlled. Mitigation measures to manage construction traffic and protect local roads are set out in the **Outline Construction Traffic Management Plan (CTMP) [APP-287]**. The **CTMP [APP-287]** has been developed to minimise impacts on the local highway network and includes measures for routing, scheduling of deliveries and liaison with the local highway authority. A road condition and dilapidation survey of minor roads not typically used by HGV traffic is included as a measure within the CTMP. Any damage to verges or carriageway surfaces caused by construction vehicles will be rectified to the satisfaction of the local highway authority. The preparation, approval and implementation of the final CTMP, substantially in accordance with the outline **CTMP [APP-297]**, are secured through Requirement 15 of Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring construction traffic impacts, including potential damage to local roads, are appropriately managed throughout the construction phase of the Scheme. Impacts of the Scheme on property prices have not been assessed as these have been agreed by the Planning Inspectorate to be scoped out of assessment in the ES, as set out in **ES Volume 3, Appendix 1-2: Scoping Opinion Response Table [APP-181].** The potential effects of the Scheme on the cultural heritage of the

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Fosse Way and associated Roman archaeological assets are fully assessed in **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, supported by detailed technical appendices in **ES Volume 3, Appendices 12-1 to 12-7 [APP-219 to APP-231]**. The assessment identifies known Roman heritage assets, considers their significance, and evaluates likely effects during construction, operation and decommissioning, including effects on setting. **Appendix 12.1: Heritage Statement [APP-219]** identified that the overall setting and significance of the Fosse Way will remain intact, and the asset will retain its legibility as a roadway within a largely agrarian landscape. Consequently, no significant effects were identified to the asset. Since the design presented at PEIR stage, Field C26, the westernmost part of Field C25, and the majority of Field C13 have been entirely removed from the Order Limits. Solar PV Panels have also been removed entirely from within Fields B1-B5, C24-C25, and C13. A number of fields abutting the Fosse Way within which Solar PV Panels will be erected have had offsets established with their boundaries with Fosse Way, including Fields B6, C10-C12, and C22-C23. **Appendix 12.1: Heritage Statement [APP-219]** identifies that the overall setting and significance of the Fosse Way will remain intact, and the asset will retain its legibility as a roadway within a largely agrarian landscape. Consequently, no significant effects were identified to the asset. Embedded mitigation measures to avoid or reduce harm to heritage assets are set out in Section 12.9 of **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, with additional mitigation detailed in Section 12.11. An overarching archaeological mitigation strategy is provided in **ES Volume 3, Appendix 12-6: Outline Archaeological Mitigation Strategy [APP-230]**.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			The preparation, approval and implementation of detailed archaeological Written Schemes of Investigation for each part of the Proposed Development, substantially in accordance with the **Appendix 12-6 Outline Archaeological Mitigation Strategy [APP-230]**, are secured through Requirement 12 of Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that appropriate protection, recording and mitigation are delivered during the relevant part of the Proposed Development.

6.8 Phillip Goodchild

Table 6-8 RR-3812

Reference	Theme	Comments/Issues Raised	Applicant's Response
PG-001	Socio-Economics, Tourism and Recreation Noise and Vibration	Lime Down Solar Project Objection I object to the proposals for Lime Down Solar Project both as a member of the wider local community and owner of a residence that will experience a permanent adverse impact on our way of life given its proximity to the development. My objection is in 2 parts Objection to the development - impact on my residence and way of life - I live at 3 Grain Store Barn. I own the property and live here with my wife and 2 older children. Grain Store Barn is made up of 4 properties which are all lived in by their owners. It is at the end of a single-track lane (Pig Lane) in Farleaze. This is a rural property surrounded by fields that are all currently farmed by local farmers. - The Lime Down C section of the Lime Down Solar Park development will engulf our residence enclosing the property on 3 sides with fields now containing 4.5-meter solar panels, and 7-meter-high transformers. The fields will be surrounded by industrial fencing and security equipment. The residents of all the Grain Store Barn properties will in effect now be living in an industrial facility. Our quality of life will be severely and adversely impacted.	Grain Store Barn is identified as receptor RG020 and has been fully assessed in **ES Volume 3, Appendix 8-3-2-2: Landscape and Visual Assessment Sheets (Significant) [APP-191].** The assessment recognises that there would be Major/Moderate Adverse effects which are Significant during Construction and Year 1. The assessment notes: The Scheme has been designed to accommodate these residential properties, and infrastructure has been set back to allow separation and space for mitigation. Views of construction activity would be visible in open views across the surrounding fields, where visible, this would be set back from the properties by at least 150m. There is no proposed infrastructure within field C16 and open views are maintained to the south. The level of change in views would be High. Proposed mitigation includes reinforced roadside screening, new sections of hedgerow, hedgerow reinforcement and enhancement is proposed throughout the surrounding Site. Although this would have a limited effect initially, by Year 15 mitigation planting would filter views of the proposed infrastructure and reduce visibility of the Scheme reducing the effect to Moderate/ Minor adverse which is non-significant.

Reference	Theme	Comments/Issues Raised	Applicant's Response
		- The documents submitted by the developer recognise that Grain Store Barn residences will be adversely impacted by the development, Grain Store Barn is noted in the following documents o APP - 66 - Noise and Vibration (residence R45) o APP - 60 - Landscape and Visual Impact o APP - 73 - Cumulative and In-Combination Effects - I object to the development of Lime Down Solar Park for the following reasons specific to my own property, - Industrialisation of Farleaze - Despite recognising that our residence will be adversely impacted by the development in these specific areas, no amendments to any of the developers plans or actions have been taken despite these concerns being raised in the consultation process held by the developer throughout 2025.	
PG-002	Consultation and Engagement	Consultation Process - The Consultation Process followed by the developers has provided no confidence to me that my or other residents of Grain Store Barn have been taken into consideration. This has often felt like a 'tick box' exercise and despite Grain Store Barn raising significant and material concerns, the developer's approach has been to either dismiss them or refer us to the current process	The Applicant places significant value on local knowledge and confirms that the concerns of Grain Store Barn residents were afforded consideration through direct engagement including residents' participation in statutory consultation events, a dedicated site visit and a meeting with the Applicant where specific plans and localised impacts were discussed. As a direct result of this active dialogue and the iterative design process, the Applicant confirmed amendments to the Scheme to include a further setback of panel infrastructure away from these properties. These changes were confirmed to residents in writing

Reference	Theme	Comments/Issues Raised	Applicant's Response
		with the Government Inspectorate. I have seen no material amendment to any plans or provision of additional information or mitigations to recognise our concerns. I do not believe the developer has shown any interest in actively listening to Grain Store Barn residents or entering any serious dialogue on the impact on our property and the local environment. At one stage documents were being produced by the developer that showed our property as an 'ancient woodland' with no recognition that Grain Store Barn even existed. Many of the consultation documents did not acknowledge the existence of Grain Store Barn but did mention the Farleaze cottages further down Pig Lane and the amendments to the Lime Down C plans to consider the potential impact on their properties. We are and certainly feel like an inconvenience to the developers and collateral in their pursuit of completing this development.	and are reflected in the final application design, specifically within **ES Volume 2, Figure 3-1: Indicative Site Layout Plan [APP-081]** and the **Landscape and Ecology Mitigation Plan [APP-084]**. The Applicant confirms that the final application documentation accurately identifies residential receptors, including the Grain Store Barn, and acknowledges that a correction to a layer on one map during Statutory Consultation was corrected to show the property had been excluded from the project boundary. The proposed design incorporates screening and substantial buffers beyond the 50m minimum distance, to beyond a nearby telecoms line, to maintain the privacy and amenity of residents, as detailed in the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]**. The Applicant remains committed to working collaboratively residents and does not consider members of the community or residents an inconvenience. The Applicant is confident that the consultation process has led to an improved Scheme that balances local sensitivities with the urgent national need for renewable infrastructure. Engagement with local communities has been a key part of the Scheme's development, as detailed in the **Consultation Report [APP-022].** The Applicant welcomes ongoing engagement during the Examination.
PG-003	Site selection and Alternatives Soils and Agriculture Landscape and Visual	Objection to the overall Lime Down Solar Park development in principle - The sheer scale of the development (2000 acres) will mean a current rural location in the Cotswolds with its network of small villages will have their quality of life adversely impacted forever. The rich cultural heritage of this part of the Cotswolds will be lost.	The Scheme has been designed to deliver the greatest possible benefit from the available land and the available grid connection, whilst avoiding, minimising and/or mitigating harmful environmental effects. The total area within the DCO Order Limits encompasses approximately 1,237 hectares (ha). Of this, around 479.5 ha of land is proposed as being required for installation of solar PV, battery storage, and associated infrastructure. The remaining 269.5 ha would provide areas dedicated to ecological mitigation;

Reference	Theme	Comments/Issues Raised	Applicant's Response
	Description and DCO Process	- The Lime Down Solar Farm Project development is not on unused land; it is using good arable land and will be cover across 9 villages and the communities that live in them. The development makes no concessions for the residents of the 9 villages and those in even more rural locations. If the development goes ahead, they will now be living in an industrial zone. Their way (and quality) of life will be adversely impacted. - Farming is at the heart of this community; removal of good arable land will impact local farming production and benefit to local economies. There seems to be no consideration over removal of land for food production (vital to the sustainment of the UK) in any part of Government policy when considering developments such as Lime Down Solar Farm. - It represents the industrialisation of the Cotswolds with no trade off benefits for the local community or local economy. This project does not provide jobs or any sustainable benefits to the local area, if anything it will mean replacement of land currently used for farming (key sector in local economy) and have a negative impact on other	measurable Biodiversity Net Gain (BNG) delivery, landscaping, and agricultural land managed for environmental enhancement and habitat creation. The Applicant remains committed to delivering a Scheme that makes a meaningful contribution to the UK's transition to net zero, while also seeking to minimise adverse impacts and maximise opportunities for environmental enhancement and community benefits. <u>Cultural Heritage</u> The potential effects of the Scheme on cultural heritage, including archaeological assets dated to the Roman and medieval periods, are fully assessed in **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, supported by detailed technical appendices in **ES Volume 3, Appendices 12-1 to 12-7 [APP-219 to APP-231]**. The chapter considers baseline conditions, identifies built and archaeological heritage assets within the study area, and assesses likely effects during construction, operation and decommissioning, including effects on setting. The chapter concluded that, following mitigation, the residual effects on any archaeological assets including Roman and medieval period remains, would be neutral/negligible and therefore not significant (see **Volume 3, Appendix 12-8 Cultural Heritage Impact Assessment Tables [APP-232]**). The assessment is underpinned by extensive desk-based research, geophysical survey and evaluation trenching, as detailed in **ES Volume 3, Appendix 12-2: Archaeological Desk-Based Assessments [APP-220], Appendix 12-4: Archaeological Geophysical Survey Reports [APP-224], and Appendix 12-5: Interim Evaluation Trial Trenching Reports [APP-225].**

Reference	Theme	Comments/Issues Raised	Applicant's Response
		sectors such as tourism. Local economy and residents will suffer as a result. - There is NO local support for this, whether it is the residents, businesses, or elected members of parish councils and Wiltshire County Council. There is no local support for this development as it provides no benefit to the local community and will adversely impact the way (and quality) of life forever.	The Applicant notes that the approach to the assessment has been agreed with Wiltshire Council and the methodology for the mitigation strategy is under discussion with Wiltshire Council and is set out in the relevant **Statement of Common Ground** to be submitted at Deadline 1. Embedded mitigation measures to avoid or reduce harm to heritage assets are set out in Section 12.9 of **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, with additional mitigation measures detailed in Section 12.11. An overarching archaeological mitigation strategy is provided in **ES Volume 3, Appendix 12-6: Outline Archaeological Mitigation Strategy [APP-230]**, which sets out the framework for further archaeological investigation, recording and protection where ground disturbance cannot be avoided. The preparation, approval and implementation of detailed archaeological Written Schemes of Investigation, substantially in accordance with the Outline Archaeological Mitigation Strategy, are secured through Requirement 12 of Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that appropriate protection, recording and mitigation are delivered before and during construction. <u>Soils and Agriculture and Site Selection</u> An assessment of the potential effects of the Scheme on soils and agricultural land is provided in **ES Volume 1, Chapter 17 Soils and Agriculture [APP-069]**. This chapter considers baseline agricultural land quality, including Best and Most Versatile (BMV) land, and assesses likely significant effects arising from construction, operation and decommissioning of the Scheme, together with embedded mitigation measures. The areas of each Agricultural Land Classification (ALC) grade affected by the Scheme are set out in **ES Volume 1, Chapter**

Reference	Theme	Comments/Issues Raised	Applicant's Response
			17: Soils and Agriculture [APP-069], Section 17.7. Of the agricultural land within the Solar PV Sites, approximately 477.4 hectares (around 67%) is classified as Subgrade 3b or Grade 4 and is therefore not BMV land. There is no Grade 1 land, around 30.8 hectares (approximately 4%) of Grade 2 land, and approximately 209.3 hectares (around 29%) of Subgrade 3a land. The distribution of ALC grades is shown in **ES Volume 2, Figure 17-2: Agricultural Land Classification Mapping [APP-172]**. The Applicant has had regard to agricultural land quality in the design and site selection process and has sought, where practicable, to locate infrastructure on lower quality land. The Scheme will result in a temporary but long-term and reversible loss of agricultural land for the operational life of the Scheme. As set out in **ES Chapter 17**, Section 17.10, this gives rise to a temporary, long-term moderate adverse effect on agricultural land overall, and a temporary, long-term major/moderate adverse effect on BMV land, both of which are assessed as significant. These effects are fully reported in the ES and are a matter for the Secretary of State to weigh in the planning balance against the need for the Scheme and its wider benefits. There are no significant permanent effects on agricultural land, as all land will be returned to its original use and condition as far as practicable following decommissioning. The Applicant notes that the approach to assessing the quality of the agricultural land is under further discussion with Natural England and is set out in the relevant **Statement of Common Ground** to be submitted at Deadline 1. Measures to avoid and minimise effects on soils and agricultural land are embedded within the Scheme design and secured through the DCO. These include the preparation and implementation of a **Soil Resources Management Plan (SRMP) [APP-280]**, which will control soil handling, storage and

Reference	Theme	Comments/Issues Raised	Applicant's Response
			reinstatement during construction, operation and decommissioning, and a requirement to prepare and implement a Decommissioning Strategy in accordance with the **Outline Decommissioning Strategy [APP-279]**. Through the establishment and maintenance of long-term grassland beneath and between the solar arrays, soil health, quality and structure are anticipated to improve over the lifetime of the Scheme, resulting in a temporary, moderate beneficial effect on soil resources at decommissioning, which is assessed as significant (**ES Volume 1 Chapter 17: Soils and Agriculture [APP-069]**, Sections 17.10 and 17.12). Government-led agricultural initiatives, such as the Sustainable Farming Incentive which is relaunching later in 2026, have prioritised soil health, environmental enhancement and climate resilience, recognising that long-term food security is influenced by a range of factors beyond land take alone, including soil condition, climate change and environmental pressures. The Scheme allows soils to remain in situ and undisturbed during operation, supporting soil recovery and long-term land health, with land reinstated and returned to agricultural use as far as practicable following decommissioning. No permanent loss of agricultural land is anticipated. The Applicant does not consider that food security will be compromised by the Scheme (or solar energy more widely). The latest figures to September 2024 indicate that solar occupied around 21,200 ha of agricultural land in the UK. In 2025, 545,000 ha of arable land in England were left uncropped (source: Department for Environment, Food & Rural Affairs, Agricultural land use in England at 1 June 2025). It should also be noted that food security is not identified as an issue within the suite of Energy National Policy Statements or the National Planning Policy Framework (NPPF).

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Further, the Government's UK Solar Roadmap (2025) states that solar development is not considered to compromise food security, but that the climate and nature crisis poses the greatest long-term risk to food security- a risk which the Scheme directly helps to address by providing a secure, low-carbon source of electricity. As set out in Section 2 of the **Outline Decommissioning Strategy [APP-279],** post-decommissioning of the Scheme, the landowners would choose how the land is to be used and managed. The landowner may return all of the land to arable use, although it is likely that established habitats such as hedgerows and woodland would be retained given their potential benefits to agricultural land and the wider farming estate. Local Economy and Employment An assessment of the likely effects of the Scheme on the local economy and employment is provided in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]**. This chapter considers potential impacts on construction and engineering sectors, agricultural activity, tourism-related businesses, and wider local economic conditions during construction, operation and decommissioning. Supporting evidence is provided in **ES Volume 3, Appendix 16-3: Socio-Economics, Tourism and Recreation – Summary of Non-Significant Effects [APP-242]**, which summarises that effects on the local economy and economic prosperity are assessed as negligible to minor beneficial, with construction expenditure and employment generation contributing positive, temporary effects on local economic activity. The assessment therefore concludes that the Scheme would not

Reference	Theme	Comments/Issues Raised	Applicant's Response
			result in significant adverse effects on local businesses or the wider local economy, and that socio-economic benefits, including job creation and local supply-chain opportunities, are expected during the construction phase, with more modest economic and skills and supply chain opportunities during the operational phase. The Applicant notes that the approach to assessment of socio-economic effects has been agreed with Wiltshire Council's Economic and Regeneration Team, with the exception of matters relating to agricultural employment, which the Applicant is discussing with the team. This is set out in the Statement of Common Ground with Wiltshire Council to be submitted at Deadline 1. <u>Tourism and Recreation</u> The potential effects of the Scheme on tourism and recreation are assessed in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]**, supported by **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]**. The assessment considers baseline tourism activity, visitor attractions, recreational assets and tourism-dependent businesses within the study area. The assessment evaluates potential effects on the use, enjoyment and desirability of nearby tourism destinations, including impacts on individual visitor attractions, recreational routes, events and businesses reliant on tourism. It also considers whether changes to landscape character or visual amenity could influence visitor behaviour. The assessment identifies a worst-case scenario in which a temporary loss of up to 50 tourism-related jobs could occur locally during construction, and a long-term loss of up to 11

Reference	Theme	Comments/Issues Raised	Applicant's Response
			tourism-related jobs could occur during the operational phase of the Scheme. This represents a precautionary estimate based on conservative assumptions. The assessment concludes that, while some localised effects on tourism receptors are anticipated to occur, significant adverse effects on the wider tourism economy are not anticipated. These findings are fully reported in the ES and will be weighed in the planning balance alongside the Scheme's wider economic and environmental benefits. The Applicant notes that the approach to assessment of tourism impacts is under discussion with Wiltshire Council's Economic and Regeneration Team and is set out in the Statement of Common Ground with Wiltshire Council to be submitted at Deadline 1. <u>Community Benefit</u> The Applicant acknowledges that any adverse effects from the Scheme are more likely to be felt locally than the largely wider-scale benefits of the Scheme. The Scheme is anticipated to help meet the UK's net zero requirements for energy production, which is considered a critical national priority and set out in National Policy Statements for Energy NPS EN-1 (section 4.2) and EN-3. This therefore will benefit the national population rather than just the local population. The Scheme is also anticipated to benefit the population within approximately 20km of the Scheme, through providing employment and income especially during construction and peak replacement activities, and providing skills and training opportunities. Where the Scheme is anticipated to benefit local people more

Reference	Theme	Comments/Issues Raised	Applicant's Response
			specifically, this is done through providing onsite permissive paths to increase access to the countryside, providing improved landscape planting through reinforcing existing hedgerows and planting of new trees, providing biodiversity net gains through habitat improvements. That notwithstanding, the Applicant is committed to providing a Community Benefit Fund to allow for community-driven benefits that are not necessarily associated with the Scheme itself. The purpose is to establish a means to recognise local community needs that the Applicant wants to be able to contribute towards in recognition of the local impact of the Scheme. The Community Benefit Fund is separate from the DCO process, and so is not bound to the same timescales or information requirements as submitted information. Furthermore, community benefits are legally immaterial to planning decisions and cannot be considered when deciding whether to grant planning consent. The Applicant acknowledges this and so has sought to provide the Community Benefit Fund voluntarily even though it won't add favourable weight in the planning balance.
PG-004	Cumulative Effects	We already have Solar Farms within the local vicinity (e.g. Hullavington). Residents have had to deal with the visual impact, noise, glint and glare and noise generated by these small-scale developments compared to the Lime Down Project proposals. In this way the local area and its residents have already supported the development of solar farm projects contributing to UK Net Zero targets. This raises the question as to why other alternative sites have not been considered and why a scheme the size of Lime Down	As a direct result of this active dialogue and the iterative design process, the Applicant confirmed amendments to the Scheme to include a further setback of panel infrastructure away from these properties. These changes were confirmed to residents in writing and are reflected in the final application design, specifically within **ES Volume 2, Figure 3-1: Indicative Site Layout Plan [APP-081]** and the **Landscape and Ecology Mitigation Plan [APP-084]**. A comprehensive Cumulative and In-Combination Effects Assessment has been undertaken in accordance with Planning Inspectorate Advice Note 17 and the relevant NPS EN-1, NPS EN-3 and NPS EN-5 requirements which are set out within **Environmental Statement Volume 1, Chapter 21: Cumulative**

Reference	Theme	Comments/Issues Raised	Applicant's Response
		should be imposed on local communities when the area already had to tolerate the adverse impacts of several other solar farm developments.	**and In-Combination Effects [APP-073]** and **ES Volume 3, Appendix 21-1: Long List of In-Combination Effects and Cumulative Developments [APP-264].** Interaction with proposed or consented but not yet built developments has been fully explored within each of the **technical assessments [APP-059 - APP-072]** with a summary of each of these assessments provided within **ES Chapter 21 In-Combination and Cumulative Effects [APP-073]**. Existing schemes are captured within the baseline environment. The four stage cumulative assessment methodology is described within **ES Volume 1, Chapter 6 EIA Methodology [APP-058]**. 358 developments were included in the **Long List [APP-264]**. 41 developments are included in the short list (and are therefore assessed) including a number of proposed solar and BESS developments. The list of developments included in the cumulative assessment was reviewed and developed in consultation with Wiltshire Council. Taking a conservative worse case approach, significant cumulative effects are identified at a limited and discrete number of receptors comprising tourism and recreation impacts during the construction phase on Corsham Park, PRoW WT|CORM|122, long path and Sustrans Cycle Route 403, and on skylark at a District level. Skylark-specific mitigation and habitat enhancement measures are incorporated into the Scheme design to reduce effects on skylark as far as practicable and are described in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061].** These include the provision of suitably large, open set-aside and grassland habitats designed to provide suitable skylark breeding and foraging conditions. These measures are illustrated in **ES Volume 2, Figure 3-4: Landscape and Ecological Mitigation Plan [APP-084]** and detailed in the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]**. Such measures have been designed to reduce the anticipated residual effects resulting from the Scheme to a Local level of geographic importance.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			As set out in **ES Volume 1, Chapter 4 Alternatives and Design Evolution [APP-056]** and the Site Selection Assessment Report at **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]** an appraisal of alternative sites within a 20km radius of the Existing National Grid Melksham Substation has been undertaken, which concludes that there are no more suitable locations within the 20km search area than the proposed location for the Scheme.
PG-005	Landscape and Visual	Adverse impact on Landscape and Visual Impact - imposition of 4.5-meter-high solar panels, a BESS and all the security and fencing materials - the beautiful countryside we enjoy today will be lost. No amount of mitigation will be able to hide or blend the sheer scale of this development into the landscape. Residents and visitors will see and hear this Solar Farm. I notice the very limited pictures or drawings in the developers reports showing how the mitigation will work and help residents visualise how their local area will be impacted. - Residents and visitors currently enjoy an array of footpaths and bridleways in the local area providing opportunity to enjoy the beautiful Cotswolds countryside experiencing the local wildlife and surroundings. This will be lost as they will now have to negotiate and walk through or around the solar panels, invertors, transformers and the associated fencing and security cameras. Again, no amount of	<u>Landscape and Visual</u> An assessment of landscape and visual effects is provided in the Landscape and Visual Impact Assessment (LVIA) presented in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**. The LVIA assesses effects on identified landscape and visual receptors, including residential properties and users of public rights of way, during construction, operation and decommissioning, using clearly defined design parameters, including a maximum height of 4.5 metres above ground level at maximum tilt, as set out in **ES Volume 1, Chapter 3: The Scheme [APP-055]**, to ensure a robust assessment. The LVIA found no significant long term visual effects to Residential Properties as a consequence of the Scheme. The scale of development within the Order Limits has been significantly reduced from the layout assessed in the Preliminary Environmental Information Report (PEIR) through an iterative design process undertaken in response to consultation and in accordance with the mitigation hierarchy to avoid, reduce and mitigate adverse effects. As part of this design evolution, panels along the edge of the Cotswolds National Landscape and along the Fosse Way have been removed. In addition, the Scheme design incorporates minimum offsets from existing landscape features, including residential properties, ancient woodland, woodland, hedgerows, public rights of way and watercourses, to

Reference	Theme	Comments/Issues Raised	Applicant's Response
		mitigation will be able to hide the solar project due to the size of the scheme and the equipment used. Another key attraction of the local area will be lost.	further limit visual impacts. Mitigation measures to address landscape and visual effects, including measures that reduce the perceived height and prominence of panels in views, are set out in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**, Figure 3-4-1 to 3-4-5.2 **Landscape and Ecology Mitigation Plan [APP-084]** and secured within the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]** and the **Outline Ecological Protection and Mitigation Strategy (EPMS) [APP-284]**. These documents include proposals for new and enhanced planting, retention of existing hedgerows and woodland, and landscape integration measures to reduce visual effects over time. The preparation, approval and implementation of detailed landscape and ecological management plans, substantially in accordance with the **OLEMP [APP-283]** and **EPMS [APP-284]**, are secured through requirements in Schedule 2 of the **Draft Development Consent Order [APP-016]**, including Requirement 7 in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that the identified mitigation measures are delivered and maintained throughout the lifetime of the Scheme. The approach to presenting information and supporting material during consultation is described within the **Consultation Report [APP-022]**. The Applicant considers that the visual material submitted is proportionate to the stage of design and sufficient to support the assessment of landscape and visual effects. The Applicant welcomes ongoing engagement during the Examination should Interested Parties require clarification on any of the visual material submitted.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Noise and Vibration An assessment of the effects of the Scheme on noise and vibration is provided in **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**, with supporting technical information supplied in **ES Volume 3, Appendix 14-4: Noise Modelling [APP-237]**. The assessment considers potential noise and vibration impacts during construction, operation and decommissioning, including from solar PV panels and associated infrastructure, with conclusions set out below. The Applicant notes that the approach to noise and vibration has been discussed with Wiltshire Council, as described in Section 14.2 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**. Construction phase The noise and vibration impacts arising from construction activities are assessed in Section 14.10 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**. For the purposes of the assessment, a reasonable worst-case scenario assuming piling activities has been considered. Mitigation measures associated with construction activity are presented in Section 14.9 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]** and are committed to through the **Outline Construction Environmental Management Plan [APP-277]**. A noise monitoring programme agreed with Wiltshire Council will be carried out during construction. The preparation, approval and implementation of the Construction Environmental Management Plan, substantially in accordance with the **Outline CEMP [APP-277]**, is secured through Requirement 13 in Schedule 2 of the **Draft**

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Development Consent Order [APP-016], ensuring that construction noise and vibration are appropriately controlled. With these measures in place, the assessment concludes that no significant effects from construction noise or vibration are expected. <u>Operational phase</u> The noise impacts from the operation of the Scheme and its components are assessed in Section 14.10 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**, with supporting modelling provided in **ES Volume 3, Appendix 14-4: Noise Modelling [APP-237]**. A penalty has been applied to predicted noise levels from the Solar PV Sites to account for the distinctive nature of the sound. Potential mitigation measures are detailed in Section 14.9 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**, and with such measures in place, significant effects from operational noise are not expected. The **Outline Operational Environmental Management Plan [APP-278]** commits to noise levels from the Scheme at residential dwellings being the same as or below those modelled in the ES. This provides assurance that significant effects from operational noise will be avoided, while allowing flexibility in how this is achieved. The preparation, approval and implementation of the detailed OEMP, substantially in accordance with the outline plan, are secured through Requirement 14 of Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring operational noise is appropriately controlled throughout the lifetime of the Scheme.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			PRoW and Recreational Access A detailed assessment of the likely significance of effects from the Scheme on the use and desirability of individual PRoWs and recreational access to the countryside is included in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** and **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]**. This assessment considers the impact on individual recreational routes, including their practical use, enjoyment and desirability. The assessment in **ES Volume 1, Chapter 18: Human Health [APP-070]** goes on to assess the physical and mental health impacts of changes to recreation and countryside access under the assessment topic 'open space, leisure and play', finding that no significant adverse effects are anticipated at any phase of the Scheme. The Applicant notes that the approach to recreation and access to the countryside has been agreed with Wiltshire Council's Public Health team and is under discussion with Wiltshire Council's Countryside Access Team. This is set out in the Statement of Common Ground with Wiltshire Council to be submitted at Deadline 1.
PG-006	Noise and Vibration	Adverse impact of Noise both during construction, operation and decommissioning. The developers acknowledge there will be an increase in noise because of this development. Whether it is the violent noise of pile driving during construction or the drone of the continued cooling of the electronic infrastructure at the BESS or various inverters and transformers in each of the locations. I believe the	The noise and vibration impacts arising from construction activities are assessed in Section 14.10 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**. Mitigation measures are committed to through the **Outline Construction Environmental Management Plan [APP-277]**. As a reasonable worst-case this assessment includes the noise from piling rigs that will be larger and louder than those used in practice. A noise monitoring programme agreed with Wiltshire Council will be carried out during construction. The preparation, approval and implementation of the

Reference	Theme	Comments/Issues Raised	Applicant's Response
		studies completed by the developers on noise significantly underestimate the impact the Lime Down Project will have on increased noise in the area especially with the strong winds in some locations. The sheer size of the development will mean the residents will have to endure the drone of the Solar Farm for 60 years.	Construction Environmental Management Plan, substantially in accordance with the **Outline CEMP [APP-277]**, is secured through Requirement 13 in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that construction noise and vibration are appropriately controlled. With these measures in place, the assessment concludes that no significant effects from construction noise or vibration are expected. The noise impacts from the operation of the Scheme and its components are assessed in Section 14.10 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**. As shown in Table 8 of **ES Volume 3, Appendix 14-4: Noise Modelling [APP-237]**, levels would typically be below or slightly above the existing background sound in the area. The levels have been calculated, using the appropriate international standard, on a worst-case assumption that wind is blowing from the source of the noise to the receptor locations, as stated in paragraph 14.4.15 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**. The **Outline Operational Environmental Management Plan [APP-278]** commits to noise levels from the Scheme at residential dwellings being the same as or below those modelled in the ES. This provides assurance that significant effects from operational noise will be avoided, while allowing flexibility in how this is achieved. The preparation, approval and implementation of the detailed OEMP, substantially in accordance with the outline plan, are secured through Requirement 14 of Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring operational noise is appropriately controlled throughout the lifetime of the Scheme.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			The **ES [APP-052 to APP-265]** and environmental and ecological surveys have been undertaken by competent experts with considerable experience assessing similar schemes. Details of qualifications, experience and professional institute membership are provided within **ES Volume 3, Appendix 1-1 Statement of Competence [APP-180]**.
PG-007	Transport and Access	Infrastructure - The area covered by the Lime Down Solar Park is not set up for industrial development. The country lanes and local infrastructure simply cannot actively support this type of development. This will mean great imposition on the local residents through road congestion, noise and material inconvenience.	The capacity of local roads and infrastructure to accommodate construction vehicles is assessed in **ES Volume 1, Chapter 13: Transport and Access [APP-065]**, which considers construction traffic volumes, vehicle types, route suitability and network performance. The assessment concludes that, with appropriate mitigation in place, there would be no significant adverse impacts on the local highway network. Supporting technical information is provided in **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]**, which identifies specific locations where traffic management measures or passing arrangements may be required on narrower sections of construction routes. The assessment presented in Annex H of **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]** demonstrates adequate carriageway width or frequency of passing place opportunity to pass at least an HGV and a light vehicle as requested in comments provided by Wiltshire Council. All construction routes also include passing points to allow two HGVs to pass. Mitigation measures to manage construction traffic are set out in the **Outline Construction Traffic Management Plan (Outline CTMP) [APP-287]**. The CTMP is designed to minimise the effects of construction traffic on local roads and includes measures for vehicle routing, delivery scheduling and liaison with the local highway authority.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			The preparation, approval and implementation of the final CTMP, substantially in accordance with the **Outline CTMP [APP-287]**, are secured through Requirement 15 of Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring construction traffic impacts on local roads and infrastructure are appropriately managed throughout the construction phase of the Scheme. The noise effects associated with construction traffic are assessed in **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**, which considers noise from construction vehicles, HGV movements and associated changes in traffic flows on the local road network. Supporting technical information is provided in **ES Volume 3, Appendix 14-4: Noise Modelling [APP-237]**. The assessment concludes that, with embedded mitigation in place, noise effects from construction traffic would be negligible or low in magnitude and no significant adverse effects are predicted. The Applicant notes that the approach to construction noise and vibration has been discussed with Wiltshire Council, as described in Section 14.2 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**. Mitigation measures to manage construction traffic and minimise associated noise are set out in the **Outline Construction Traffic Management Plan [APP-287]**, which includes defined vehicle routing, delivery scheduling and coordination with the local highway authority to reduce impacts on sensitive receptors. The preparation, approval and implementation of the final CTMP, substantially in accordance with the outline CTMP, are secured through Requirement 15 of Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring construction

Reference	Theme	Comments/Issues Raised	Applicant's Response
			traffic noise is appropriately managed throughout the construction phase of the Scheme.
PG-008	Human Health Other Environmental Matters	Public Safety - The risks of the imposition of this industrial electrical development to public safety are significant. The risk of potential fire, release of poisonous gases and a major accident or disaster are significant. This then allies to the point above; the local infrastructure simply cannot cope with this type of potential public safety event and has potential to threaten lives of residents. This may seem a bit extreme and sensationalist, but I do not believe the developers have not given this the attention it deserves, especially regarding the concerns of residents around the BESS.	The Battery Energy Storage System (BESS) containers proposed for the Scheme will incorporate built-in safety features for fire avoidance, detection and suppression. The Scheme layout also incorporates separation distances between battery containers to ensure that any isolated fire would not become widespread or lead to a major incident. As shown on **ES Volume 2, Figure 3-1: Indicative Site Layout Plan [APP-081]**, the battery containers will be located more than 200 metres from the nearest Public Right of Way and more than 500 metres from any residential receptors. The Applicant notes that the approach to BESS safety is under discussion with Dorset and Wiltshire Fire and Rescue Service (D&WFRS) and the latest position is set out in the relevant **Statement of Common Ground** to be submitted at Deadline 1. An **Outline Battery Safety Management Plan (OBSMP) [APP-286]** has been prepared for the Scheme using guidance from Dorset and Wiltshire Fire and Rescue Service and incorporating recommendations of the National Fire Chiefs Council. The OBSMP ensures that risks associated with battery storage are appropriately mitigated. Section 6.1.1 of the **OBSMP [APP-286]** confirms that at the detailed design stage, the selected BESS will have undertaken Large Scale Fire Testing (LSFT) to fully inform inputs for risk assessment tools which will be utilised together with detailed consequence modelling to provide a comprehensive site operations and emergency response safety audit. LSFT is a mandatory requirement under NFPA 855 (2026) safety standards to demonstrate thermal insulation protection capabilities of the BESS enclosure design, validate minimum equipment spacing distances, and demonstrate that deflagrations do not occur

Reference	Theme	Comments/Issues Raised	Applicant's Response
			and/or can be safely constrained. As set out in **OBSMP [APP-286]**, the BESS Area will have a robust and validated Emergency Response Plan (ERP), developed in consultation with Dorset & Wiltshire Fire and Rescue Service at the detailed design stage. Section 5.4 of the OBSMP specifies the typical emergency response protocols, procedures and safety information that will be included in the ERP. The ERP will apply to all stages of the Scheme, including construction, operation and decommissioning. Potential effects of toxic gases arising from a BESS fire are assessed in **ES Volume 1, Chapter 15: Air Quality [APP-067]** and in **ES Volume 1, Chapter 20: Other Environmental Matters [APP-072]**, Section 20.7: Major Accidents and Disasters. An assessment of how these fumes could affect sensitive receptors within a 1 km radius of the BESS Area, including residential properties and ecological receptors, is provided in **ES Volume 1, Chapter 15: Air Quality [APP-067].** This assessment concludes that no significant off-site impacts are predicted should a fire event occur. In the unlikely event of a fire, the precautionary measures set out in the **Outline Battery Safety Management Plan (OBSMP) [APP-286]** — including advice to remain indoors and close windows — would further reduce potential impacts to residents. The **OBSMP [APP-286]** is secured through Requirement 6 (Battery safety management) in Schedule 2 of the **Draft DCO [APP-016]**, which provides that Work No. 2 must not commence until a Battery Safety Management Plan has been submitted to and approved by the relevant planning authority. The approved plan must be substantially in accordance with the Outline Battery Safety Management Plan. The Draft DCO also requires the relevant planning authority to consult with Dorset and Wiltshire Fire and Rescue Service and the Environment Agency before

Reference	Theme	Comments/Issues Raised	Applicant's Response
			determining the application, and that the Battery Safety Management Plan must be implemented as approved.
PG-009	Hydrology, Flood Risk and Drainage	Flood Risk - The area covered by the Lime Down Solar Park already suffers from local flooding with several roads and lanes impassable due to flood water. This has the potential to be made worse with the development of the Solar Farm.	An assessment of the effects of the Scheme on flood risk both within the Site and the surrounding area is provided in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [APP-063]**, with supporting information provided in **ES Volume 3, Appendix 11-1 to 11-9: Flood Risk Assessment and Drainage Strategy [APP-210 to APP-218].** The assessment concludes that, with the embedded mitigation measures secured, the Scheme would not result in a material increase in off-site flood risk, including to adjacent communities and downstream receptors, and that any on-site flood risk would be managed such that the Scheme remains safe and operable for its lifetime. The assessment has been prepared in accordance with national policy and best practice guidance and in consultation with the Environment Agency and Lead Local Flood Authority and is set out in the relevant **Statement of Common Ground** to be submitted at Deadline 1. The **Outline Construction Environmental Management Plan (Outline CEMP) [APP-277]** has been developed to control construction-phase risks and ensure there is no material increase in off-site flood risk. In accordance with NPS EN-3 (paragraph 2.10.84), the assessment differentiates between solar PV panel areas, which drain to the existing ground and therefore do not generally give rise to significant drainage effects, and associated infrastructure (for example access tracks, temporary construction compounds, substations and the BESS) where runoff controls are required. Where drainage measures are necessary, these include permeable surfacing, infiltration features, swales and attenuation storage to manage surface water and maintain greenfield runoff behaviour, as applicable.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Requirement 13 in Schedule 2 to the **Draft DCO [APP-016]** secures that part of the authorised development can commence until, a CEMP is submitted to and approved by the relevant planning authority. The CEMP must be substantially in accordance with the **Outline CEMP [APP-277]**, and all construction works associated must be carried out in accordance with the approved CEMP.
PG-010	Hydrology, Flood Risk and Drainage Transport and Access Socio-Economics, Tourism and Recreation	Water Supply - One of the chief concerns expressed by all the residents of the Grain Store Barn was regarding our water supply. All our water comes direct from our dedicated bore hole next to the property. We expressed concerns to the developers I our written consultation processes as to impact of construction and operation on the bore hole given our proximity to the solar farm development to the developers during the consultation. Our concern being if water supply would be impacted by the development. This was repeated in a meeting held with the developers during the process also. Again, the developers simply said this should not be an issue with no real evidence provided. As Grain Store Barn residents, we do not have any other water supply so at very least would expect some evidence this has been looked at and evidence produced to support there should be no issue on this. This remains a major concern for me and the Grain Store Barn residents. - Traffic Disruption - As Pig Lane is a	With respect to PROWs and access to the countryside, this has been assessed in **ES Volume 1,Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** and the supporting **ES Volume 3 Appendix 16-2 Tourism and Recreation Receptor Tables [APP-241]**. Consideration of the likely impact on views, character and the desirability of these routes to users has been fundamental to the assessment of likely significant effects. The Applicant confirms that no significant residual adverse effects to PROWs surrounding Grain Store Barn are anticipated at any phase of the Scheme, subject to implementation of mitigation measures. Furthermore, the resultant likely effects from the Scheme on access to the countryside and open space for recreation as a metric of wellbeing has been assessed in **ES Volume 1, Chapter 18: Human Health [APP-070]** under the headings 'open space, leisure and play'. The assessment finds no significant adverse effects to health and wellbeing at any phase of the Scheme. The Applicant acknowledges the concern regarding reliance on a private borehole water supply. The assessment of groundwater and potential pollutant pathways is set out in **Environmental Statement Volume 1, Chapter 19 Ground Conditions [APP-071]**, with control measures for construction activities secured through the **Outline Construction Environmental**

Reference	Theme	Comments/Issues Raised	Applicant's Response
		single-track lane, we were told by the developers that this would not be used during the construction phase. There would be a crossing point on Pig Lane for the developer's vehicles to transfer between fields the Lie Down C Solar Panels would be situated in. On review of the 'Streets Plan' in the developers plans it now states that the part of Pig Lane we use to access our residence will now be subject to both 'Street works / Street subject to traffic regulation measures' and 'Street with use temporarily suspended or restricted'. This again is of major concern to me as the details are not clear on the impact on residents and our ability to freely move in and out of our property or access for emergency vehicles. As far as I am aware these restrictions were not notified during the consultation process. - Footpaths and Bridleways - around Grain Store Barn, we currently enjoy access to footpaths and bridleways enabling us to enjoy the local countryside and rural locations. These footpaths will now include having to walk through a Solar Farm. A key element of country life will again be taken away as we now walk through an industrial landscape. - Flood Risk - I believe the potential flood risk from the imposition of the Solar Farm has not properly been	**Management Plan [APP-277]** and the **Draft Development Consent Order [APP-016]**. In hydrology and flood risk terms, the Scheme does not require operational abstraction and is not expected to affect groundwater availability to private supplies. Potential construction-phase risks to groundwater quality are managed through embedded mitigation, including pollution prevention and incident response measures, and the requirement for detailed construction controls to be approved at discharge. The concern regarding local road flooding is considered within **Environmental Statement Volume 1, Chapter 11 Hydrology, Flood Risk and Drainage [APP-063]**, which assesses surface water runoff mechanisms and concludes that, with embedded mitigation and secured controls, the Scheme would not increase flood risk elsewhere or give rise to significant adverse effects on hydrology receptors.

Reference	Theme	Comments/Issues Raised	Applicant's Response
		considered. The roads in around Farleaze flood as rain comes of the fields. The Solar Farm presents itself as potential flood risk.	
PG-010	Ecology and Biodiversity Landscape and Visual Noise and Vibration Other Environmental Matters	Environmental Impact - As a result, if this development goes forward, we are effectively being told by the developers that the Solar Farm will not impact Grain Store Barn by any of these factors. Given the direct proximity of the development to Grain Store Barn, I struggle to understand how this can be allowed and that the developer believes the combined and cumulative impact of Noise, Glint and Glare and Landscape and Visual Impact plus all the other environmental considerations will not adversely impact the way of life we enjoy today. We will just have to live with the recognised adverse environmental impacts. - Landscape and Visual Impact - It is clear, our views and landscape will be forever changed and the rural environment we currently enjoy will be forever removed. It estimated it would take at least 15-years for any tree and hedgerow planting to take any sort of effect. I believe this is also optimistic especially when trying to shield 4.5-meter solar panels and 7m transformers plus all the associated security equipment. The developer has not been able to provide us with any pictures or illustrations of what our new	The landscape and visual effects of the Scheme have been robustly assessed in the **ES Chapter Volume 3, LVIA [APP-060]** has been undertaken with consideration of the appropriate and relevant guidance and robustly assesses both the landscape and visual effects of the Scheme independently to ensure both the impacts and effects on the fabric and character of the landscape are taken into account as well as the views and visibility. A detailed LVIA methodology is included within **ES Appendix 8.1 [APP-187],** which has been progressed and agreed with the Local Planning Authorities. The Applicant confirms that consideration of impacts to PROWs, unsurfaced roads, and the recreational use of the highway network has been assessed in **ES Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** and the supporting **ES Volume 3 Appendix 16-2 Tourism and Recreation Receptor Tables [APP-241]**. The Applicant confirms that the majority of significant adverse effects can be mitigated, however understands that some significant adverse effects to users of routes in Lime Down E or regionally important long-ditance recreational routes cannot be mitigated further during construction. The assessment has considered the impacts to individual routes to build a picture of the likely impact on the overall PROW and highway network, determining that the overall effects within the 2 km Study Area is not a significant adverse effect at any stage of the Scheme. This is largely owing to the large number of PROWs and rural routes, given a great level of optionality to users, even in the presence of the Scheme. The noise and vibration impacts arising from construction activities are assessed in Section 14.10 of **ES Volume 1,**

Reference	Theme	Comments/Issues Raised	Applicant's Response
		environment will look like and how this will mitigate the impacts of the development. In the one meeting the residents of Grain Store Barn had with the developers during the consultation process, the only concession they made was to move the development very slightly back on one side. The only other comments from the developer were to make sure we make representations to yourselves (Government Inspectorate) as and when this happens. - Noise - The proximity of the Solar Farm development to Grain Store Barn will mean there will be material noise pollution from both the construction, operation and decommissioning of the solar farm but also the BESS facility in nearby Hullavington. The noise will travel especially with the strong winds we experience in Farleaze. I object to the findings of the Noise studies conducted by the developer. I believe the noise pollution from this development will be intrusive and adversely impact the residents of Grain Store Barn. I am not an expert in the 'noise' measurements used or how they have been calculated but for the noise survey's conducted to result in no significant impact on Grain Store Barn environment and the developer needing to amend their plans as a result is startling. During the	**Chapter 14: Noise and Vibration [APP-066]**. Mitigation measures are committed to through the **Outline Construction Environmental Management Plan [APP-277]**. As a reasonable worst-case this assessment includes the noise from piling rigs that will be larger and louder than those used in practice. With these measures in place, the assessment concludes that daily noise exposure levels would not breach significant effect thresholds. Piling associated with the closest solar PV panels will be audible at Grain Store Barn but will be relatively short-lived in comparison to the overall construction programme. A noise monitoring programme agreed with Wiltshire Council will be carried out during construction. The noise impacts from the operation of the Scheme and its components are assessed in Section 14.10 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**. As shown in Table 8 of **ES Volume 3, Appendix 14-4: Noise Modelling [APP-237]**, noise levels from the Scheme at Grain Store Barn, which would be primarily from the BESS facility, would typically be around the existing background sound in the area. The levels have been calculated, using the appropriate international standard, on a worst-case assumption that wind is blowing from the source of the noise to the receptor locations, as stated in paragraph 14.4.15 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**. The **Outline Operational Environmental Management Plan [APP-278]** commits to noise levels from the Scheme at residential dwellings being the same as or below those modelled in the ES. This provides assurance that significant effects from operational noise will be avoided, while allowing flexibility in how this is achieved. Grain Store Barn has been considered within the **ES Volume 3, Appendix 20-4: Solar Photovoltaic Glint and Glare Study**

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		construction phase the noise impact of the constant pile driving will be very intrusive. In our one meeting with the developers during the consultation process, the comment was made it would probably be advisable if you could find somewhere else to live during the months of construction. - Glint and Glare - Again the proximity of the proposed development to Grain Store Barn will mean the Glint and Glare from the Solar Farms will impact the residents of Grain Store Barn. The volume and proximity of the Solar Farms to Grain Store Barn means this must be an environmental impact on the residents. Another environmental impact that has been dismissed by the developers for Grain Store Barn.	**[APP-261]** as dwelling receptor 249. A low impact is predicted, as effects are predicted to occur for less than 3 months per year and less than 60 minutes on any given day in practice.

6.9 Melanie Hill

Table 6-9 RR-3127

Reference	Theme	Comments/Issues Raised	Applicant's Response
MH-001	Site selection and Alternatives Ecology and Biodiversity	The proposed Lime Down development is wholly inappropriate - the wrong type, the wrong size, and in the wrong place. Having read the consultation documents in detail, it is clear that the scheme will have a significant adverse impact on the local wildlife in the fields around this village (including protected bird species such as **linnets** and skylarks), and the mitigation proposals that have been offered to date are totally inadequate.	Type Chapter 6 of the **Statement of Need [APP-266]** provides an analysis of many different low carbon generation technologies which are being developed as part of the UK's fight against climate change. The Statement of Need concludes, in Section 6.12, that a large capacity of many low carbon technologies is required to meet the Government's energy objectives. While the need for unprecedented capacity growth is urgent, some technologies (e.g. nuclear, SMRs, tidal) are either unproven at scale, unconsented, unfunded or have long development timescales (and therefore do not meet the urgent need identified in EN-1 Para 3.1.1 and following). These technologies and indeed other technologies may not be suitable to connect to Melksham substation and therefore would not support the need to use existing and available infrastructure to minimise the cost and timescales associated with connecting to the grid, the large capacities of low carbon generation needed to meet net zero. Section 7.7 of the Statement of Need compares the annual energy generated per square kilometre from solar, from onshore wind and from crop-to-energy (biofuels) technology. The analysis shows that large-scale ground-mount solar schemes which maximise their annual output, are likely to produce a greater quantity of low carbon electricity per acre than the output from a crop-to-biogas application; and that the energy production from land under solar is of a similar order of magnitude to the energy production from land under onshore wind, while the environmental effects of solar schemes may be significantly lower. The Applicant therefore agrees that other low carbon

Reference	Theme	Comments/Issues Raised	Applicant's Response
			technologies are urgently needed in the UK to meet the UK's climate legal targets; however, none of those technologies are more suitable at the proposed location than the Scheme, and none listed in this Representation are viable alternatives to the Scheme, because they will all be needed too. <u>Size</u> The Scheme has been designed to deliver the greatest possible benefit from the available land and the available grid connection, whilst avoiding, minimising and/or mitigating harmful environmental effects. As per the description set out in **ES Volume 1, Chapter 3: The Scheme [APP-055]** the total area within the DCO Order Limits encompasses approximately 1,237 hectares (ha). Of this, the 'Solar PV Sites' comprise approximately 749.1 ha of land. Around 479.5 ha of this land is proposed as being required for installation of solar PV, battery storage, and associated infrastructure. The remaining 269.5 ha would provide areas dedicated to ecological mitigation, measurable Biodiversity Net Gain (BNG) delivery, landscaping, offsets and agricultural land managed for environmental enhancement and habitat creation. The Cable Route Corridor, which stretches approximately 22 km from 'Lime Down D' to Melksham Substation and links together the Solar PV Sites, covers approximately 463.2 ha. Approximately 17.8 ha (of which 5.9 ha overlap with the Cable Route Corridor) is proposed for Highway Improvement Areas within which improvements to sections of the existing highway network will be completed to facilitate access to the Scheme, such as improvements to road edge and traffic management. Work will be undertaken by the Applicant and National Grid within the Existing National Grid Melksham Substation, requiring a total area of 12.8 ha.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			The Applicant remains committed to delivering a Scheme that makes a meaningful contribution to the UK's transition to net zero, while also seeking to minimise adverse impacts and maximise opportunities for environmental enhancement and community benefits. Location National Policy Statement EN-3 Paras 2.10.11 and 2.10.18 explain that the availability of grid connection, suitable irradiance levels, and local topography are key inputs to the selection of sites suitable for large-scale solar generation developments. The number of locations within the UK at which large-scale solar generation is suitable is therefore likely to be limited, and this is a material issue when considering how the UK is to meet the urgent need for low carbon generation as is set out in the NPSs. This point is expanded upon in the **Statement of Need [APP-266]** in particular in Section 4.3. Chapter 8 of the **Statement of Need [APP-266]** provides evidence to support the suitability of the proposed location of the Scheme for large-scale solar plus storage in relation to the timeliness and availability of the grid connection, transmission system operability and the decarbonisation and energy security benefits the Scheme will bring forward from this location. As set out in **ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP-056]** and the Site Selection Assessment Report at **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]** an appraisal of alternative sites within a 20km radius of the Existing National Grid Melksham Substation has been undertaken, which concludes that there are no more suitable locations within the 20km search area than the proposed location for the Scheme. Ecology and Biodiversity

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Potential impacts of the Scheme on ecology and biodiversity are assessed in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**, which considers baseline conditions and evaluates likely effects during construction, operation and decommissioning. The assessment identifies embedded and additional mitigation measures and concludes that, with these measures in place, no unacceptable significant adverse effects on ecology and biodiversity are anticipated. The assessment identifies skylarks as a key species of conservation interest within the Scheme area. It concludes that a proportion of the current skylark population will be displaced from the Solar PV Sites, which will give rise to an adverse residual effect at a Local level. Skylark-specific mitigation and habitat enhancement measures are incorporated into the Scheme design to reduce effects as far as practicable. These include the provision of suitably large, open set-aside and grassland habitats designed to provide appropriate breeding and foraging conditions. These measures are illustrated in **ES Volume 2, Figure 3-4: Landscape and Ecological Mitigation Plan [APP-084]** and detailed in the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]**. The impacts of the Scheme on linnets are assessed within **ES Volume 1, Chapter 9: Ecology and Biodiversity[APP-061]** under the broader grouping of breeding birds. Unlike skylarks, linnets are not expected to be displaced by solar panels and typically nest in dense cover such as scrub and hedgerows. This species, along with most other bird species currently using the land within the Order Limits, can be expected to benefit from the creation and enhancement of a wide range of habitats including grasslands and hedgerows across the Solar PV Sites, which are shown in **ES Volume 2, Figure 3-4: Landscape and Ecological Mitigation Plan [APP-084]** and detailed in the **Outline**

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Landscape and Ecological Management Plan (OLEMP) [APP-283]. The Applicant is confident that the proposed management and mitigation measures set out in the **Environmental Statement [APP-052 to APP-265]** are comprehensive and robust and that the Scheme aligns with national and local planning policy; this is outlined in the **Planning Statement [APP-267]**. Of particular relevance are Annex A: National Policy Statement Accordance Tables and Annex B: Local Policy Accordance Tables, of the Planning Statement which set out an appraisal of the Scheme against national and local planning policies.
MH-002	Landscape and Visual Socio-Economics, Tourism and Recreation	The effect that this would have on the landscape, amenity land and the important cultural and historical heritage of this lovely part of North Wiltshire would be highly detrimental, and it would be bound to have a negative impact on the county's valuable tourism industry, with both social and economic consequences. We owe it to ourselves as Wiltshire residents, and to future generations, to prevent this dreadful proposal going through.	<u>Landscape and Visual</u> An assessment of landscape and visual effects is provided in the Landscape and Visual Impact Assessment (LVIA) presented in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**. The LVIA assesses effects on identified landscape and visual receptors, including residential properties and users of public rights of way, and identifies where significant effects may occur. The LVIA found no significant long term visual effects to Residential Properties as a consequence of the Scheme. The scale of development within the Order Limits has been significantly reduced from the layout assessed in the Preliminary Environmental Information Report (PEIR) through an iterative design process undertaken in response to consultation and in accordance with the mitigation hierarchy to avoid, reduce and mitigate adverse effects. As part of this design evolution, panels along the edge of the Cotswolds National Landscape and along the Fosse Way have been removed. Mitigation measures to address landscape and visual effects are

Reference	Theme	Comments/Issues Raised	Applicant's Response
			set out in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**, **Figure 3-4-1 to 3-4-5.2 Landscape and Ecology Mitigation Plan [APP-084]** and secured within the **Outline Landscape and Ecological Mitigation Plan (LEMP) [APP-283]** and the **Outline Ecological Protection and Mitigation Strategy (EPMS) [APP-284]**. These documents include proposals for new and enhanced planting, retention of existing hedgerows and woodland, and landscape integration measures to reduce visual effects over time. In addition, the Scheme design incorporates minimum offsets from existing landscape features, including residential properties, ancient woodland, woodland, hedgerows, public rights of way and watercourses, to further limit visual impacts. The preparation, approval and implementation of detailed landscape and ecological management plans, substantially in accordance with the **OLEMP [APP-283]** and **EPMS [APP-284]**, are secured through requirements in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that the identified mitigation measures are delivered and maintained throughout the lifetime of the Scheme. <u>Cultural Heritage</u> The potential effects of the Scheme on cultural heritage, including archaeological assets dated to the Roman and medieval periods, are fully assessed in **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, supported by detailed technical appendices in **ES Volume 3, Appendices 12-1 to 12-7 [APP-219 to APP-231]**. The chapter considers baseline conditions, identifies built and archaeological heritage assets within the study area, and assesses likely effects during construction, operation and decommissioning, including effects on setting. The chapter concluded that, following mitigation, the residual effects on any

Reference	Theme	Comments/Issues Raised	Applicant's Response
			archaeological assets including Roman and medieval period remains, would be neutral/negligible and therefore not significant (see **Volume 3, Appendix 12-8 Cultural Heritage Impact Assessment Tables [APP-232]**). The assessment is underpinned by extensive desk-based research, geophysical survey and evaluation trenching, as detailed in **ES Volume 3, Appendix 12-2: Archaeological Desk-Based Assessments [APP-220], Appendix 12-4: Archaeological Geophysical Survey Reports [APP-224], and Appendix 12-5: Interim Evaluation Trial Trenching Reports [APP-225].** The Applicant notes that the approach to the assessment has been agreed with Wiltshire Council and the methodology for the mitigation strategy is under discussion with Wiltshire Council and is set out in the relevant **Statement of Common Ground** to be submitted at Deadline 1. Embedded mitigation measures to avoid or reduce harm to heritage assets are set out in Section 12.9 of **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, with additional mitigation measures detailed in Section 12.11. An overarching archaeological mitigation strategy is provided in **ES Volume 3, Appendix 12-6: Outline Archaeological Mitigation Strategy [APP-230]**, which sets out the framework for further archaeological investigation, recording and protection where ground disturbance cannot be avoided. The preparation, approval and implementation of detailed archaeological Written Schemes of Investigation, substantially in accordance with the Outline Archaeological Mitigation Strategy, are secured through Requirement 12 of Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that appropriate protection, recording and mitigation are delivered

Reference	Theme	Comments/Issues Raised	Applicant's Response
			before and during construction. <u>Tourism and recreation</u> The potential effects of the Scheme on tourism and recreation are assessed in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]**, supported by **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]**. The assessment considers baseline tourism activity, visitor attractions, recreational assets and tourism-dependent businesses within the study area. The assessment evaluates potential effects on the use, enjoyment and desirability of nearby tourism destinations, including impacts on individual visitor attractions, recreational routes, events and businesses reliant on tourism. It also considers whether changes to landscape character or visual amenity could influence visitor behaviour. The assessment identifies a worst-case scenario in which a temporary loss of up to 50 tourism-related jobs could occur locally during construction, and a long-term loss of up to 11 tourism-related jobs could occur during the operational phase of the Scheme. This represents a precautionary estimate based on conservative assumptions. The assessment concludes that, while some localised effects on tourism receptors are anticipated to occur, significant adverse effects on the wider tourism economy are not anticipated. These findings are fully reported in the ES and will be weighed in the planning balance alongside the Scheme's wider economic and environmental benefits. The Applicant notes that the approach to assessment of tourism impacts is under discussion with Wiltshire Council's Economic

Reference	Theme	Comments/Issues Raised	Applicant's Response
			and Regeneration Team and is set out in the Statement of Common Ground with Wiltshire Council to be submitted at Deadline 1.

6.10 Karen Hallam

Table 6-10 RR-2568

Reference	Theme	Comments/Issues Raised	Applicant's Response
KH-001	Description and DCO Process Soils and Agriculture Landscape and Visual	I am not in support of the proposed Lime Down solar 'farm'. I object to the misnomer of the name 'Lime Down' as this suggests a single area whereas it is 5 separate areas totalling 2,000 acres. This, therefore, not only removes this area of farmland from producing food but all the land between them is affected too. So the area taken up by this oversized monstrosity covers an area of approximately 7x3 sq miles. This does not include miles of cable corridor. The panels themselves are not to be discretely concealed behind hedges but are 4m tall. That is more than1/2 the height of telegraph poles and will therefore be looming over hedges along several miles of country lanes bordering 6 villages and encroaching on the South Cotswolds, an area of outstanding natural beauty.	As set out in **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]**, the Applicant undertook an initial review which did not identify a single site of the appropriate size (1,100 ha) within the area of search. Therefore, the Applicant considered both contiguous land parcels and land parcels near one another. The **Statement of Need [APP-266]** explains at Section 7.4 that NSIP proposals may comprise adjoining or separate parcels of land and that "*the connection of separate parcels of suitable land together into a single scheme may, subject to analysis, enable those parcels of land to connect economically to the electricity system*" which is the case for this scheme. Section 8.2 of the **Statement of Need [APP-266]** explains that by bringing the parcels together into a single scheme, the Scheme is able to carry a connection to the National Electricity Transmission System (NETS), thus providing a local source of low carbon electricity and also enabling the efficient bulk transfer of energy generated at the Scheme so that any surplus can be used to cover shortfalls elsewhere. By connecting to the NETS, the Scheme will not impact the feasibility or timing of distribution network connections for either new generation or consumption connections which among other things are required to support the delivery of Wiltshire County Council's growth plans. <u>Food security</u> The potential effects of the Scheme on agricultural land are assessed in **ES Volume 1, Chapter 17 Soils and Agriculture [APP-069]**, which considers baseline agricultural land use and quality and evaluates likely effects during construction, operation and decommissioning. The assessment confirms that the Scheme will result in a temporary and reversible loss of agricultural land during the operational period, with all land to

Reference	Theme	Comments/Issues Raised	Applicant's Response
			be returned to its original use and condition as far as practicable following decommissioning. No permanent loss of agricultural land is anticipated. The Applicant does not consider that food security will be compromised by the Scheme (or solar energy more widely). The latest figures to September 2024 indicate that solar occupied around 21,200 ha of agricultural land in the UK. In 2025, 545,000 ha of arable land in England were left uncropped (source: Department for Environment, Food & Rural Affairs, Agricultural land use in England at 1 June 2025). It should also be noted that food security is not identified as an issue within the suite of Energy National Policy Statements or the National Planning Policy Framework (NPPF). Further, the Government's UK Solar Roadmap (2025) states that solar development is not considered to compromise food security, but that the climate and nature crisis poses the greatest long-term risk to food security- a risk which the Scheme directly helps to address by providing a secure, low-carbon source of electricity. As set out in Section 2 of the **Outline Decommissioning Strategy [APP-279],** post-decommissioning of the Scheme, the landowners would choose how the land is to be used and managed. The landowner may return all of the land to arable use, although it is likely that established habitats such as hedgerows and woodland would be retained given their potential benefits to agricultural land and the wider farming estate. Cable Route The construction of the cable route has been assessed throughout the **ES [APP-052 to APP-265]**, which considers the

Reference	Theme	Comments/Issues Raised	Applicant's Response
			likely significant construction effects associated with these works. The **ES [APP-052 to APP-265]** assesses the cable route within defined parameters, including limits on working width and trench dimensions, to ensure that a reasonable worst-case scenario is assessed. The detailed design and construction of the cable route would be undertaken within the parameters assessed and authorised by the DCO. Measures to manage and minimise construction effects, including reinstatement of land following installation, are set out in the **Outline Construction Environmental Management Plan (CEMP) [APP-277]**. Requirement 13 in Schedule 2 to the **Draft DCO [APP-016]** secures that part of the authorised development can commence until, a CEMP is submitted to and approved by the relevant planning authority. The CEMP must be substantially in accordance with the Outline CEMP, and all construction works associated must be carried out in accordance with the approved CEMP. <u>Landscape and Visual</u> The height of the solar PV panels has been assessed using clearly defined design parameters, including a maximum height of 4.5 metres above ground level at maximum tilt, as set out in **ES Volume 1, Chapter 3: The Scheme [APP-055]**. These parameters represent a realistic worst-case scenario for the purposes of the Environmental Impact Assessment. Mitigation measures to address landscape and visual effects, including measures that reduce the perceived height and prominence of panels in views, are set out in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060], Figure 3-4-1 to 3-4-5.2 Landscape and Ecology Mitigation Plan [APP-084]** and secured within the **Outline Landscape and**

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Ecological Management Plan (OLEMP) [APP-283]. These include new and enhanced planting, retention of existing hedgerows and woodland, and landscape integration measures to reduce visual effects over time. The LVIA assesses the effectiveness of the mitigation measures over time and concludes that, in the majority of locations, where significant adverse visual effects are recorded, the visual effects would reduce to non-significant as mitigation planting establishes and matures. This demonstrates that the proposed mitigation is effective in reducing the visual effects of the Scheme. On this basis, a maximum panel height of 4.5m is not considered excessive. The preparation, approval and implementation of the detailed Landscape and Ecological Management Plan, substantially in accordance with the **OLEMP [APP-283]**, are secured through Requirement 7 in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that the identified mitigation measures are delivered and maintained throughout the lifetime of the Scheme. <u>Cotswolds National Landscape</u> The Cotswolds National Landscape (CNL) is fully assessed as a standalone receptor within **ES Volume 3, Appendix 8.6: Assessment of Effects on the Special Qualities of the Cotswolds National Landscape [APP-197]**. This assessment considers the effects of the Scheme on landscape character, visual amenity and the special qualities of the CNL, including tranquillity. The assessment found that there would be some short term impact to landscape character within the setting of the CNL but due to the avoidance measures embedded within the Scheme,

Reference	Theme	Comments/Issues Raised	Applicant's Response
			harm to the CNL itself would be minimal with beneficial effects in the long term which would further the purposes of the designation. In respect of visual amenity, some short-term adverse effects would be experienced by a small number of visual receptors with views to and from the CNL. However, these would reduce over time as a result of the proposed mitigation. The assessment of effects on the special qualities of the CNL scoped out 3 SQs as there is no association with the Site. The assessment found that there are no direct effects on the remaining SQs. There are some Minor/ Negligible short-term effects on a small number of visual receptors within the setting of the CNL which effect SQ7 -Tranquillity and SQ13 Archaeology and historic associations. However, these effects are mitigated by Year 15 when proposed vegetation has matured. The assessment also found that there would be beneficial effects on SQ 6 – Biodiversity and nature recovery as a result of the delivery of approximately 119.7 hectares of flower-rich neutral grassland (as defined in the BNG assessment) and SQ 12 - An accessible landscape as a result of the delivery of approximately 12.8km of new permissive paths within the setting of the CNL. The remaining SQs would remain entirely intact. All land parcels adjacent to the CNL are proposed to deliver habitat enhancement, informed by the CNL Management Plan and the Cotswolds National Landscape Strategy and Guidelines, to further the purposes of the designation. Details of the proposed landscape and ecological mitigation and enhancement measures such as the avoidance measures to remove panels from the boundary of CNL are provided in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060], Figure 3-4-1** to **3-4-5.2 Landscape and Ecology Mitigation Plan [APP-084]** and secured within the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283],** and

Reference	Theme	Comments/Issues Raised	Applicant's Response
			the **Outline Ecological Protection and Mitigation Strategy (OEPMS) [APP-284]**.
KH-002	Other Environmental Matters	I object to the battery storage plant which is to be erected over several acres near the village of Hullavington and 3 fields away from Farleaze. Safety has not been established. At the consultations set up by Island Green Power this question was not/could not be answered. If it catches fire it is left to burn. Do we leave our homes for days while this happens? Will the houses and land be covered by a coating of toxic and carcinogenic chemicals after the fire? What about livestock?	An **Outline Battery Safety Management Plan (OBSMP) [APP-286]** has been submitted with the Application. The OBSMP confirms that a robust and validated Emergency Response Plan (ERP) will be developed at the detailed design stage in consultation with Dorset & Wiltshire Fire and Rescue Service. Section 5.4 of the OBSMP sets out the typical emergency response protocols, procedures and safety information that will be included in the ERP. The ERP will apply across all phases of the Scheme, including construction, operation and decommissioning. The potential effects of toxic gases arising from a BESS fire are assessed in **ES Volume 1, Chapter 15: Air Quality [APP-067]**, which models potential emissions and evaluates impacts on sensitive receptors within a 1 km radius of the BESS area, including residential properties and Public Rights of Way. The assessment concludes that no significant off-site air quality impacts are predicted should a fire event occur. In the unlikely event of a fire, the precautionary measures set out in the OBSMP, such as advice to remain indoors and close windows would further reduce potential effects on nearby residents. As a result of updated Scheme design for DCO submission, BESS infrastructure is proposed more than 500 m away from the nearest dwelling. At this distance, impact to health and wellbeing from air quality, fire or explosion impacts are minimal. As such, there are no significant adverse effects to human health anticipated as a result of the Scheme, as assessed in **ES Volume 1,**

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Chapter 18: Human Health [APP-070]. On this basis, the Applicant considers that the Scheme incorporates appropriate safety and mitigation measures to manage BESS-related risks and would not give rise to significant adverse environmental or safety effects. The **OBSMP [APP-286]** is secured through Requirement 6 (Battery safety management) in Schedule 2 of the **Draft DCO [APP-016]**, which provides that Work No. 2 must not commence until a Battery Safety Management Plan has been submitted to and approved by the relevant planning authority. The approved plan must be substantially in accordance with the Outline Battery Safety Management Plan. The Draft DCO also requires the relevant planning authority to consult with Dorset and Wiltshire Fire and Rescue Service and the Environment Agency before determining the application, and that the Battery Safety Management Plan must be implemented as approved. The Applicant notes that the approach to BESS safety is under discussion with Dorset & Wiltshire Fire & Rescue Service (D&WFRS) and this will be set out in the relevant Statement of Common Ground. The Applicant notes that concerns regarding BESS safety were raised during the statutory consultation and responded to in the **Consultation Report [APP-022].** The Applicant welcomes ongoing engagement during the Examination should Interested Parties require clarification on any aspect of BESS safety.
KH-003	Noise and Vibration	I object to the fact that there will be a consistent humming produced	An assessment of the effects of the Scheme on noise and vibration is provided in **ES Volume 1, Chapter 14: Noise**

Reference	Theme	Comments/Issues Raised	Applicant's Response
		by this battery storage plant. The solar panels themselves are to be motorised to track the sun and fold to vertical at night. More continuous noise during daylight hours.	**and Vibration [APP-066]**, with supporting technical information supplied in **ES Volume 3, Appendix 14-4: Noise Modelling [APP-237]**. The assessment considers potential noise and vibration impacts during construction, operation and decommissioning, including from solar PV panels and associated infrastructure. The conclusions of the assessment in relation to each phase of the Scheme are set out below. The conclusions of the assessments are made for the Scheme as a whole (i.e. all of its components combined, including the BESS), and therefore any specific component will not have any greater effects than those that have been assessed. The Applicant notes that the approach to noise and vibration has been discussed with Wiltshire Council, as described in Section 14.2 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**. In addition, further meetings have been held over the approach to the management plans, and a Statement of Common Ground will be issued and updated throughout examination The noise impacts from the operation of the Scheme and its components are assessed in Section 14.10 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**, with supporting modelling provided in **ES Volume 3, Appendix 14-4: Noise Modelling [APP-237]**. The predicted noise levels from the Solar PV Sites have been artificially increased by 3 dB to account for the increased likelihood that the noise from the Scheme would be perceived as distinct from the existing background sound. Potential mitigation measures are detailed in Section 14.9

Reference	Theme	Comments/Issues Raised	Applicant's Response
			of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**, and with such measures in place, significant effects from operational noise are not expected. The **Outline Operational Environmental Management Plan [APP-278]** commits to noise levels from the Scheme at residential dwellings being the same as or below those modelled in the ES. This provides assurance that significant effects from operational noise will be avoided, while allowing flexibility in how this is achieved. The preparation, approval and implementation of the detailed OEMP, substantially in accordance with the outline plan, are secured through Requirement 14 of Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring operational noise is appropriately controlled throughout the lifetime of the Scheme.
KH-004	Other Environmental Matters	I object to the lack of knowledge concerning heat generated by solar panels. This question was not answered satisfactorily. I was told that the solar panels 'are designed to absorb heat, not reflect it'. Hold your hand near the surface of a black car in the sun and feel the heat generated. Then multiply this by over a million huge black panels.	While there may be a microclimate generated above the panels, it is not anticipated this will have an impact on any receptor. Evidence from published research indicates that large-scale solar arrays do not give rise to significant or widespread 'heat island effects'. An 18-month study by Fthenakis and Yu (2013) found that solar arrays are typically fully cooled during night-time hours, meaning that sustained heat retention and associated heat island effects are unlikely to occur. Further research by Barron-Gafford et al. (2016) concluded that any temperature increases associated with solar PV installations are localised and do not extend

Reference	Theme	Comments/Issues Raised	Applicant's Response
			beyond the immediate boundary of the solar farm. As such, any microclimatic effects are limited in extent and rapidly dissipate with distance from the panels. On this basis, the microclimate and heat island effects associated with the Scheme are not considered to be significant, and no meaningful thermal stress, discomfort or change in local weather conditions is anticipated for nearby residents or surrounding land uses
KH-005	Transport and Access Construction and Decommissioning	I object that during the 2 year construction period the country lanes will be bearing hundreds of hgv movements. At the consultation I was told that the lanes would need to be widened and extra passing places built . Double the width of the existing lanes? Really? Lanes and villages are not meant to withstand such vehicular onslaught. What about 'normal' users? The Wiltshire Cycleway will be swamped by construction traffic. Public rights of way are put in danger: Footpaths, bridleways, byways. I object to the vast disturbance to all of the residents of villages, farms and other private residences that will occur during 2 years of construction and forever afterwards.	The potential effects of construction traffic on the local highway network are assessed in **ES Volume 1, Chapter 13: Transport and Access [APP-065]**, which considers construction vehicle movements, traffic volumes, road safety and effects on road users. This included the capacity of local roads and infrastructure to accommodate construction vehicles with consideration of construction traffic volumes, vehicle types, route suitability, and network performance. The assessment concludes that the level of construction traffic associated with the Scheme is unlikely to materially affect road safety on links within the Study Area, and no significant adverse effects on accident risk are anticipated. The assessment additionally concludes that with appropriate mitigation such as the Construction Traffic Management Plan in place to manage construction vehicle movements, there would be no significant adverse impacts on the local highway network during the construction, operation maintenance, and decommissioning phases of the Scheme.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			An **Outline Construction Traffic Management Plan (Outline CTMP) [APP-287]** has been prepared and submitted with the DCO application. The aim of the CTMP is to ensure that the effect of the construction phase on the local highway network is minimised. The **Outline CTMP [APP-287]** secures measures to coordinate construction deliveries by HGVs to arrive and depart between 09:30 and 16:30 where possible, to avoid peak network hours of 08:00–09:00 and 17:00–18:00. It also includes a community liaison element to keep local communities informed about the construction process and to provide a contact for feedback should any issues arise. Compliance with the CTMP will be monitored by the Developer, Contractor and Wiltshire Council as local highway authority. The Outline CTMP also includes a road condition and dilapidation survey of minor roads not typically used by HGV traffic. Any damage to verges or carriageway surfaces caused by construction vehicles will be rectified to the satisfaction of the local highway authority. In addition, the Outline CTMP includes community liaison measures to keep local communities informed of construction activity and to provide a contact point for feedback should any issues arise. The preparation, approval and implementation of the final CTMP, substantially in accordance with the outline CTMP, are secured through Requirement 15 of Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring

Reference	Theme	Comments/Issues Raised	Applicant's Response
			construction traffic impacts are appropriately managed throughout the construction phase of the Scheme. The Applicant confirms that consideration of impacts to the recreational use of the highway network has been assessed in **ES Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** and the supporting **ES Volume 3 Appendix 16-2 Tourism and Recreation Receptor Tables [APP-241]**. The Applicant confirms that around Farleaze, significant adverse effects to the Wiltshire Way cycle route and Fosse Way are anticipated during construction and decommissioning. This assessment considers transport matters (safety and delay) but also user experience, amenity and desirability. The assessment does not consider that any other significant adverse effects to PROWs or to recreational users of the public highway are anticipated to occur at any phase of the Scheme. Mitigation measures to protect recreational highway users are set out in the **OCTMP [APP-287]**, which is secured by Requirement 15 in Schedule 2 to the **Draft DCO [APP-016]**. The mitigation measures include providing banksmen and speed limits where accesses interact with PROWs and The Wiltshire Way, and through specifying HGV access routes to the Scheme. These are secured through the **Outline CTMP [APP-287]** and **Outline PROWPPMP [APP-282]** by Requirements 15 and 16 respectively in Schedule 2 to the **Draft DCO [APP-016]**. The Applicant confirms that existing PRoW are to be protected as far as practicable within the Scheme design,

Reference	Theme	Comments/Issues Raised	Applicant's Response
			with management measures set out in the **Outline Public Rights of Way and Permissive Paths Management Plan (oPROWPPMP) [APP-282]**, confirmed as embedded mitigation in Section 16.9 of **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]**. <u>Decommissioning</u> The effects of decommissioning on soils and agricultural land are assessed in **ES Volume 1, Chapter 17 Soils and Agriculture [APP-069]**. As stated in this chapter, as well as in Section 2 of the **Outline Decommissioning Strategy [APP 279]** which is secured under Schedule 2, Requirement 20 of the **Draft DCO [APP-016]**, all land will be returned to its original use and condition as far as practicable and returned to the landowner. Measures to manage decommissioning and reinstatement are set out in the **Outline Decommissioning Strategy [APP-279]**, which has been submitted as part of the DCO Application. The Decommissioning Strategy will include robust methodologies and control points to avoid contamination of the underlying land with physical or chemical contaminants and will be applied in conjunction with the Soil Resources Management Plan (SRMP) in order to promote successful reinstatement. A detailed Decommissioning Strategy will be prepared substantially in accordance with the **Outline Decommissioning Strategy [APP-279]** and must be submitted to and approved by the relevant local planning authority prior to the commencement of decommissioning.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			This is secured through Requirement 20 in Schedule 2 of the **Draft Development Consent Order [APP-016]**. In addition, the Applicant is seeking a time-limited consent for the Scheme to have an operational period of 60 years, with decommissioning to take place following cessation of operation. This is secured by Requirement 20 in Schedule 2 of the **Draft DCO [APP-016]**.
KH-006	Hydrology, Flood Risk and Drainage	I object to the lack of a) clarity regarding water runoff and the effect on already overloaded drainage systems that cannot cope with heavy rain resulting in road 'closures'.	An assessment of the effects of the Scheme on flood risk both within the Site and the surrounding area is provided in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [APP-063],** with supporting information provided in **ES Volume 3, Appendix 11-1 to 11-9: Flood Risk Assessment and Drainage Strategy [APP-210 to APP-218].** The assessment concludes that, with the embedded mitigation measures secured, the Scheme would not result in a material increase in off-site flood risk, including to adjacent communities and downstream receptors, and that any on-site flood risk would be managed such that the Scheme remains safe and operable for its lifetime. The assessment has been prepared in accordance with national policy and best practice guidance and in consultation with the Environment Agency and Lead Local Flood Authority and is set out in the relevant **Statement of Common Ground** to be submitted at Deadline 1. The **Outline Construction Environmental Management Plan (Outline CEMP) [APP-277]** has been developed to control construction-phase risks and ensure there is no

Reference	Theme	Comments/Issues Raised	Applicant's Response
			material increase in off-site flood risk. In accordance with NPS EN-3 (paragraph 2.10.84), the assessment differentiates between solar PV panel areas, which drain to the existing ground and therefore do not generally give rise to significant drainage effects, and associated infrastructure (for example access tracks, temporary construction compounds, substations and the BESS) where runoff controls are required. Where drainage measures are necessary, these include permeable surfacing, infiltration features, swales and attenuation storage to manage surface water and maintain greenfield runoff behaviour, as applicable. Requirement 13 in Schedule 2 to the **Draft DCO [APP-016]** secures that part of the authorised development can commence until, a CEMP is submitted to and approved by the relevant planning authority. The CEMP must be substantially in accordance with the **Outline CEMP [APP-277]**, and all construction works associated must be carried out in accordance with the approved CEMP.
KH-007	Hydrology, Flood Risk and Drainage	b). Lack of safety data given concerning leach of toxic chemical from panels/damaged panels	Potential effects of the Scheme on water quality and contamination risk are assessed in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [APP-063]**, which sets out mitigation and management measures to protect water quality during construction and operation. These measures include pollution prevention controls, containment systems, emergency response protocols, and site-specific drainage measures, particularly around the Battery Energy Storage System (BESS) and substations where lined drainage and automatically actuating valves are proposed.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			In addition, further design specifications have been incorporated to reduce potential risk to groundwater and drinking water resources, including the use of photovoltaic panels that have not involved PFAS in their manufacture and a commitment that fluid-filled cables will not be used within the Scheme. The Applicant notes that the approach to pollution resulting from battery fire is under discussion with both the Environment Agency and the Lead Local Flood Authority (LLFA) and is set out in the relevant Statement of Common Ground to be submitted at Deadline 1. Mitigation measures to control contamination risk during construction are set out in **the Outline Construction Environmental Management Plan [APP-277]**. Routine maintenance and panel cleaning will use minimal water and no detergents or chemical cleaning agents, in line with industry standards and best practice, so there is no expected risk from cleaning runoff. In addition, the removal of agrichemical inputs through the cessation of farming activities will further reduce contamination risks compared to existing use. The preparation, approval and implementation of a Construction Environmental Management Plan substantially in accordance with the **Outline Construction Environmental Management Plan [APP-277]** is secured through Requirement 13 in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that construction works are carried out in accordance with the approved CEMP and that contamination risks are

Reference	Theme	Comments/Issues Raised	Applicant's Response
			appropriately managed throughout construction of the Scheme.
KH-008	Construction and Decommissioning	c). Lack of definitive information/answers on just how thousand of tonnes of metal and concrete will be removed from the ground after being pile driven there.	The effects of decommissioning on soils and agricultural land are assessed in **ES Volume 1, Chapter 17 Soils and Agriculture [APP-069]**. As stated in this chapter, all land will be returned to its original use and condition as far as practicable and returned to the landowner. The effect on agricultural land quality at decommissioning would be influenced by the extent of disturbance caused by the removal of the Solar PV Panels, for example the presence and dimensions of leftover voids or the depth of the remaining underground cables. Currently, the most environmentally acceptable option is to leave the cables in-situ, although the cables could be removed by excavating at regular intervals and pulling the cable through to the extraction point, thus avoiding the need to excavate the entire cable trench. In either case, the effects would be less than those likely to occur during the construction phase. Built aspects of the Scheme such as the BESS Area and substations are also subject to the proposal to return the land to its original use and condition, which is primarily agricultural land of Subgrade 3b quality, with some Subgrade 3a at the BESS Area. Measures to manage decommissioning and reinstatement are set out in the **Outline Decommissioning Strategy [APP-279]**, which has been submitted as part of the DCO Application. The Decommissioning Strategy will include robust methodologies and control points to avoid contamination of the underlying land with physical or chemical contaminants and will be applied in conjunction with the Soil Resources Management Plan (SRMP) in

Reference	Theme	Comments/Issues Raised	Applicant's Response
			order to promote successful reinstatement. A detailed Decommissioning Strategy will be prepared substantially in accordance with the **Outline Decommissioning Strategy [APP-279]** and must be submitted to and approved by the relevant local planning authority prior to the commencement of decommissioning. This is secured through Requirement 20 in Schedule 2 of the **Draft Development Consent Order [APP-016]**. In addition, the Applicant is seeking a time-limited consent for the Scheme to have an operational period of 60 years, with decommissioning to take place following cessation of operation. This is secured by Requirement 20 in Schedule 2 of the **Draft DCO [APP-016]**. The Applicant confirms that none of the land will be considered brownfield after decommissioning. The expectation is that the land will return to farming, but the Applicant cannot dictate what will happen to the land post-decommissioning when the Applicant no longer has an interest in the land.
KH-009	Socio-Economics, Tourism and Recreation Description and DCO Process	On a personal level: my house will be devalued, my mental health is going to be greatly disturbed (I am already suffering sleepless nights and stress in other forms), and my way of life destroyed by the presence of these panels over all rights of way near me. On a local level: 6 villages are	Impacts of the Scheme on property prices have not been assessed as these have been agreed by the Planning Inspectorate to be scoped out of assessment in the ES, as set out in **ES Volume 3, Appendix 1-2: Scoping Opinion Response Table [APP-181]**. <u>Mental Health and Wellbeing</u> Impacts on mental health and wellbeing are assessed in **ES Volume 1, Chapter 18: Human Health [APP-070]**.

Reference	Theme	Comments/Issues Raised	Applicant's Response
		affected/surrounded by towering, motorised solar panels and there will be no local benefit to any of these villages whatsoever	This chapter provides a comprehensive assessment of the Scheme's potential effects on human health, including mental health and wellbeing, through consideration of a broad range of health determinants. These include access to open space and recreation, transport and connectivity, community identity and cohesion, employment and income, noise and vibration, air quality, and access to health and social care services. The assessment applies a health "lens" to the findings of relevant technical chapters and concludes that, with the embedded mitigation and additional measures secured through the relevant management plans **[APP-277** to **APP-287]** secured by their respective requirements in Schedule 2 to the **Draft DCO [APP-016]**, the Scheme would not give rise to significant adverse effects on population health, including mental health and wellbeing. Mitigation measures include (but are not limited to) ensuring PROWs remain open as much as is practicable, HGV movements are set to defined routes and within set hours, community liaison and engagement is maintained, and construction impacts on noise and air quality are regulated. With specific regard to community liaison, this is directly secured through Requirement 4 in Schedule 2 to the **Draft DCO [APP-016]** through the provision of a community liaison group. This group will act as an intermediary between the public and the onsite contractors to ensure community concerns and any information they need are communicated and responded to, so as to reduce community anxiety and impacts on mental wellbeing, and

Reference	Theme	Comments/Issues Raised	Applicant's Response
			to assist in directing the public to mental health support if required. The assessment in **ES Volume 1, Chapter 18: Human Health [APP-070]** focuses on communities within a 2 km Study Area surrounding the Scheme, identified as those most likely to experience potential health-related effects. Baseline analysis demonstrates that rates of poor mental health within the Study Area are generally lower than national averages, and the assessment considers potential pathways by which the Scheme could influence mental wellbeing, including changes to environment, amenity, access and community factors. Residual effects of the Scheme on health following mitigation are assessed as not significant at any phase of the Scheme. Consultation with Wiltshire Council's Public Health Team has informed the approach to mental health considerations, as documented in **ES Volume 3, Appendix 18-1: Human Health Consultation [APP-244].** Through this engagement, the Applicant has committed to signposting locally available mental health and wellbeing resources to members of the public engaging with the Scheme, using information provided by Wiltshire Council's Public Health Team. The Applicant will continue to monitor consultation responses relating to mental health and will provide appropriate signposting to existing local support services where requested. The Applicant notes that the assessment methodology for health and wellbeing has been agreed with Wiltshire Council's Public Health team and is set out in

Reference	Theme	Comments/Issues Raised	Applicant's Response
			the relevant Statement of Common Ground to be submitted at Deadline 1. Public Rights of Way and Recreational Access A detailed assessment of the likely significance of effects from the Scheme on the use and desirability of individual PRoW, and recreational access to the countryside, has been included in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** and **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]**. This assessment considers the impact on individual recreational routes – be that practically in their use, and their enjoyment and desirability. The Applicant confirms that the majority of significant adverse effects can be mitigated, however understands that some significant adverse effects to users of PROWs and unsurfaced roads in Lime Down E cannot be mitigated further during construction. No significant residual effects are anticipated during the operational phase of the Scheme. The Applicant notes that the assessment of PROW impacts and mitigation is under discussion with Wiltshire Council's Countryside Access Team and is set out in the Statement of Common Ground with Wiltshire Councilto be submitted at Deadline 1. The Applicant confirms that existing PRoW are to be controlled within the Scheme design with PRoW management strategies set out in the **Outline Public Rights of Way and Permissive Paths Management Plan (PROWPPMP) [APP-282]**, confirmed as embedded mitigation measures in Section 16.9 of ES Chapter 16.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			New permissive access routes have been included in the Scheme design, shown as Work No.10 on the **Works Plan [APP-007]** and shown on **ES Volume 2, Figure 3-4: Landscape and Ecology Mitigation Plan [APP-283],** considered as additional mitigation and enhancement measures in Section 16.11 of ES Volume 1, Chapter 16: Socio Economics, Tourism and Recreation [AP**P-073]**. The PRoW and Permissive Paths MP is secured through Requirement 16 of Schedule 2 of the **Draft DCO [APP-016]**. The preparation, approval and implementation of the detailed CEMP and CTMP, substantially in accordance with the outline plans, are secured through Requirements 13 and 15 respectively in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that impacts on PRoW and recreational routes are appropriately managed during construction. <u>Landscape and Visual</u> An assessment of landscape and visual effects is provided in the Landscape and Visual Impact Assessment (LVIA) presented in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**. The LVIA assesses effects on identified landscape and visual receptors, including residential properties and users of public rights of way, and identifies where significant effects may occur. The LVIA found no significant long term visual effects to Residential Properties as a consequence of the Scheme. The scale of development within the Order Limits has been significantly reduced from the layout assessed in the Preliminary Environmental Information Report (PEIR) through an iterative design process undertaken in response to

Reference	Theme	Comments/Issues Raised	Applicant's Response
			consultation and in accordance with the mitigation hierarchy to avoid, reduce and mitigate adverse effects. As part of this design evolution, panels along the edge of the Cotswolds National Landscape and along the Fosse Way have been removed. Mitigation measures to address landscape and visual effects are set out in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**, **Figure 3-4-1 to 3-4-5.2 Landscape and Ecology Mitigation Plan [APP-084]** and secured within the **Outline Landscape and Ecological Mitigation Plan (LEMP) [APP-283]** and the **Outline Ecological Protection and Mitigation Strategy (EPMS) [APP-284]**, including proposals for new and enhanced planting, retention of existing hedgerows and woodland, and landscape integration measures to reduce visual effects over time. In addition, the Scheme design incorporates minimum offsets from existing landscape features, including residential properties, ancient woodland, woodland, hedgerows, public rights of way and watercourses, to further limit visual impacts. The preparation, approval and implementation of detailed landscape and ecological management plans, substantially in accordance with the **OLEMP [APP-283]** and **EPMS [APP-284]**, are secured through requirements in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that the identified mitigation measures are delivered and maintained throughout the lifetime of the Scheme. Community Benefit

Reference	Theme	Comments/Issues Raised	Applicant's Response
			The Applicant acknowledges that any adverse effects from the Scheme are more likely to be felt locally than the largely wider-scale benefits of the Scheme. The Scheme is anticipated to help meet the UK's net zero requirements for energy production, which is considered a critical national priority and set out in National Policy Statements for Energy NPS EN-1 (section 4.2) and EN-3, benefiting the national population rather than just the local population. The Scheme is also anticipated to benefit the population within approximately 20km of the Scheme, through providing employment and income especially during construction and peak replacement activities, and providing skills and training opportunities. Where the Scheme is anticipated to benefit local people more specifically, this is done through providing onsite permissive paths to increase access to the countryside, providing improved landscape planting through reinforcing existing hedgerows and planting of new trees, and providing biodiversity net gains through habitat improvements. The Applicant is committed to providing a Community Benefit Fund to allow for community-driven benefits that are not necessarily associated with the Scheme itself, to recognise local community needs in recognition of the local impact of the Scheme. The Community Benefit Fund is separate from the DCO process, and so is not bound to the same timescales or information requirements as submitted information. Furthermore, community benefits are legally immaterial to planning decisions and cannot be considered when deciding whether to grant planning consent.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			The Applicant acknowledges this and so has sought to provide the Community Benefit Fund voluntarily even though it won't add favourable weight in the planning balance.
KH-010	Soils and Agriculture Climate Change and Energy Need Description and DCO Process	On a national level: we will lose square miles of high grade, food producing, farmland. This country already imports 40% of its food. The carbon footprint of construction and delivering/shipping thousand of tonnes is massive. What about the mining costs and manufacturing costs of the materials? It will take many years just to offset this. Electricity prices are set to go up until the £millions laid out are recouped. Island Green Power and (Redacted)? Do we need a repeat of this? This is not 'green'. This is a business run for profit.	Food Security The potential effects of the Scheme on agricultural land are assessed in **ES Volume 1, Chapter 17 Soils and Agriculture [APP-069]**, which considers baseline agricultural land use and quality and evaluates likely effects during construction, operation and decommissioning. The assessment confirms that the Scheme will result in a temporary and reversible loss of agricultural land during the operational period, with all land to be returned to its original use and condition as far as practicable following decommissioning. No permanent loss of agricultural land is anticipated. The Applicant does not consider that food security will be compromised by the Scheme (or solar energy more widely). The latest figures to September 2024 indicate that solar occupied around 21,200 ha of agricultural land in the UK. In 2025, 545,000 ha of arable land in England were left uncropped (source: Department for Environment, Food & Rural Affairs, Agricultural land use in England at 1 June 2025). It should also be noted that food security is not identified as an issue within the suite of Energy National Policy Statements or the National Planning Policy Framework (NPPF). Further, the Government's UK Solar Roadmap (2025) states that solar development is not considered to compromise

Reference	Theme	Comments/Issues Raised	Applicant's Response
			food security, but that the climate and nature crisis poses the greatest long-term risk to food security- a risk which the Scheme directly helps to address by providing a secure, low-carbon source of electricity. As set out in Section 2 of the **Outline Decommissioning Strategy [APP-279],** post-decommissioning of the Scheme, the landowners would choose how the land is to be used and managed. The landowner may return all of the land to arable use, although it is likely that established habitats such as hedgerows and woodland would be retained given their potential benefits to agricultural land and the wider farming estate. <u>Embodied Carbon</u> **ES Volume 1, Chapter 7: Climate Change [APP-059]** assesses the greenhouse gas (GHG) emissions associated with the full life cycle of the Scheme, including the manufacture, transport, installation, operation, maintenance and decommissioning of Scheme components such as solar PV panels, inverters, transformers and battery storage infrastructure. This includes consideration of embodied carbon arising from the production of rare earth materials and components, which reflects the upstream environmental impacts associated with their manufacture. The assessment recognises that the manufacture and transport of solar PV panels and batteries represent a notable proportion of the Scheme's lifecycle GHG emissions. These impacts are considered within the

Reference	Theme	Comments/Issues Raised	Applicant's Response
			context of national carbon budgets and the UK's transition to net zero, with the assessment concluding that the Scheme would make a meaningful contribution to reducing greenhouse gas emissions over its operational lifetime when compared to a 'without Scheme' scenario. In addition, **ES Volume 1, Chapter 20: Other Environmental Matters [APP-072]** considers the use of materials and natural resources, including minerals, materials supply This chapter confirms that the Scheme would not give rise to significant effects in relation to minerals, materials or waste, and that embedded mitigation measures and good practice would be applied throughout the construction, operation. The ES also identifies embedded mitigation measures across the Scheme, including the use of durable components with long operational lifespans, allowances for replacement over time, and the recyclability of key components such as solar panels, batteries and electrical equipment. These measures reduce the need for ongoing extraction of virgin materials and limit long-term environmental impacts. The Applicant acknowledges the expression of distrust towards the Scheme and has demonstrated compliance with all statutory requirements under the Planning Act 2008 and applicable legislation such as The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017. The Applicant is subject to legally binding DCO requirements. The Planning Act 2008 also contains

Reference	Theme	Comments/Issues Raised	Applicant's Response
			enforcement provisions regarding compliance with the terms of a DCO. The DCO process itself incorporates enforceable mechanisms to regulate Scheme delivery. Any breach of the development consent order or failure to comply with Requirements is a criminal offence and can result in enforcement action. The **Statement of Need [APP-266]** explains, at Section 10.2, how increasing the capacity of renewable assets in GB reduces the traded price of power. Renewables also provide a shield against volatile international energy markets. The inclusion of energy storage as associated development to the main solar scheme will support the operation of the main solar scheme and will be able to store energy generated by the main solar scheme and export it to the grid when it is needed and so reduce the cost of electricity at those times.
KH-011	Landscape and Visual	Unanswered questions The whole scheme is flawed by its enormity. It will adversely affect several square miles of countryside. This is prime food producing farmland. It is an area of Outstanding Natural Beauty in the Cotswolds.	<u>Scale</u> The Scheme has been designed to deliver the greatest possible benefit from the available land and the available grid connection, whilst avoiding, minimising and/or mitigating harmful environmental effects. As per the description set out in **ES Volume 1, Chapter 3: The Scheme [APP-055]** the total area within the DCO Order Limits encompasses approximately 1,237 hectares (ha). Of this, the 'Solar PV Sites' comprise approximately 749.1 ha of land. Around 479.5 ha of this land is proposed as being required for installation of solar PV, battery

Reference	Theme	Comments/Issues Raised	Applicant's Response
			storage, and associated infrastructure. The remaining 269.5 ha would provide areas dedicated to ecological mitigation, measurable Biodiversity Net Gain (BNG) delivery, landscaping, offsets and agricultural land managed for environmental enhancement and habitat creation. The Applicant remains committed to delivering a Scheme that makes a meaningful contribution to the UK's transition to net zero, while also seeking to minimise adverse impacts and maximise opportunities for environmental enhancement and community benefits. <u>Agricultural Land</u> An assessment of the potential effects of the Scheme on soils and agricultural land is provided in **ES Volume 1, Chapter 17 Soils and Agriculture [APP-069]**. This chapter considers baseline agricultural land quality, including Best and Most Versatile (BMV) land, and assesses likely significant effects arising from construction, operation and decommissioning of the Scheme, together with embedded mitigation measures. The areas of each Agricultural Land Classification (ALC) grade affected by the Scheme are set out in **ES Volume 1, Chapter 17: Soils and Agriculture [APP-069],** Section 17.7. Of the agricultural land within the Solar PV Sites, approximately 477.4 hectares (around 67%) is classified as Subgrade 3b or Grade 4 and is therefore not BMV land. There is no Grade 1 land, around 30.8 hectares (approximately 4%) of Grade 2 land, and approximately

Reference	Theme	Comments/Issues Raised	Applicant's Response
			209.3 hectares (around 29%) of Subgrade 3a land. The distribution of ALC grades is shown in **ES Volume 2, Figure 17-2: Agricultural Land Classification Mapping [APP-172]**. The Applicant has had regard to agricultural land quality in the design and site selection process and has sought, where practicable, to locate infrastructure on lower quality land. The Scheme will result in a temporary but long-term and reversible loss of agricultural land for the operational life of the Scheme. As set out in **ES Volume 1, Chapter 17: Soils and Agriculture [APP-069]**, Section 17.10, this gives rise to a temporary, long-term moderate adverse effect on agricultural land overall, and a temporary, long-term major/moderate adverse effect on BMV land, both of which are assessed as significant. These effects are fully reported in the ES and are a matter for the Secretary of State to weigh in the planning balance against the need for the Scheme and its wider benefits. There are no significant permanent effects on agricultural land, as all land will be returned to its original use and condition as far as practicable following decommissioning. The Applicant notes that the approach to assessing the quality of the agricultural land is under further discussion with Natural England and is set out in the relevant **Statement of Common Ground** to be submitted at Deadline 1. Measures to avoid and minimise effects on soils and agricultural land are embedded within the Scheme design and secured through the DCO. These include the

Reference	Theme	Comments/Issues Raised	Applicant's Response
			preparation and implementation of a **Soil Resources Management Plan (SRMP) [APP-280]**, which will control soil handling, storage and reinstatement during construction, operation and decommissioning, and a requirement to prepare and implement a Decommissioning Strategy in accordance with the **Outline Decommissioning Strategy [APP-279]**. Through the establishment and maintenance of long-term grassland beneath and between the solar arrays, soil health, quality and structure are anticipated to improve over the lifetime of the Scheme, resulting in a temporary, moderate beneficial effect on soil resources at decommissioning, which is assessed as significant (**ES Volume 1, Chapter 17: Soils and Agriculture [APP-069]**, Sections 17.10 and 17.12). <u>Cotswolds National Landscape</u> The Cotswolds National Landscape (CNL) is fully assessed as a standalone receptor within **ES Volume 3, Appendix 8.6: Assessment of Effects on the Special Qualities of the Cotswolds National Landscape [APP-197]**. This assessment considers the effects of the Scheme on landscape character, visual amenity and the special qualities of the CNL, including tranquillity. The assessment found that there would be some short term impact to landscape character within the setting of the CNL but due to the avoidance measures embedded within the Scheme, harm to the CNL itself would be minimal with beneficial effects in the long term which would further the

Reference	Theme	Comments/Issues Raised	Applicant's Response
			purposes of the designation. In respect of visual amenity, some short-term adverse effects would be experienced by a small number of visual receptors with views to and from the CNL. However, these would reduce over time as a result of the proposed mitigation. The assessment of effects on the special qualities of the CNL scoped out 3 SQs as there is no association with the Site. The assessment found that there are no direct effects on the remaining SQs. There are some Minor/ Negligible short-term effects on a small number of visual receptors within the setting of the CNL which effect SQ7 -Tranquillity and SQ13 Archaeology and historic associations. However, these effects are mitigated by Year 15 when proposed vegetation has matured. The assessment also found that there would be beneficial effects on SQ 6 – Biodiversity and nature recovery as a result of the delivery of approximately 119.7 hectares of flower-rich neutral grassland (as defined in the BNG assessment) and SQ 12 - An accessible landscape as a result of the delivery of approximately 12.8km of new permissive paths within the setting of the CNL. The remaining SQs would remain entirely intact. The Scheme was refined through an iterative design process to avoid and reduce effects on the CNL and its setting. Panels along the edge of the CNL were removed from the Order Limits in fields C2, C3 and C4 where significant visual effects on receptors within the CNL were identified. Panels were also removed from fields C1, C6, C8, the western section of C9 and the majority of C10, with this land now proposed for ecological mitigation to protect the setting of the CNL. In addition, panels within fields A11

Reference	Theme	Comments/Issues Raised	Applicant's Response
			and A12 were removed and the land repurposed for ecological mitigation to protect the setting of the CNL towards Sherston. All land parcels adjacent to the CNL are proposed to deliver habitat enhancement, informed by the CNL Management Plan and the Cotswolds National Landscape Strategy and Guidelines, to further the purposes of the designation. Details of the proposed landscape and ecological mitigation and enhancement measures are provided in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**, **Figure 3-4-1 to 3-4-5.2 Landscape and Ecology Mitigation Plan [APP-084]** and secured within the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]**, and the **Outline Ecological Protection and Mitigation Strategy (EPMS) [APP-284]**. The preparation, approval and implementation of the detailed Landscape and Ecological Management Plan, substantially in accordance with the **OLEMP [APP-283]**, are secured through Requirement 7 in Schedule 2 of the **Draft Development Consent Order [APP-016]**. The preparation, approval and implementation of the detailed Ecological Protection and Mitigation Strategy, substantially in accordance with the **EPMS [APP-284]**, are secured through Requirement 8 in Schedule 2 of the **Draft Development Consent Order [APP-016]**. These requirements ensure that the identified mitigation and enhancement measures are delivered and maintained throughout the lifetime of the Scheme.

Reference	Theme	Comments/Issues Raised	Applicant's Response
KH-012	Landscape and Visual	As well as destroying farmland the 3m high motorised panels will be visible along both sides of country lanes surrounding 9 badly affected villages.	An assessment of visual effects on transport receptors, including users of local roads, lanes and strategic routes and Public Rights of Way receptors, is provided in the Landscape and Visual Impact Assessment (LVIA) presented in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**. The full assessments are located in **Appendix 8-3-2-1 Visual Assessment Sheets (Non-Significant) [APP-190]** and **Appendix 8-3-2-2 Landscape and Visual Assessment Sheets (Significant) [APP-191]** and evaluates the magnitude and significance of visual effects during construction, operation and decommissioning. The assessment confirms that visual effects on road users have been considered in accordance with recognised guidance, including the identification of specific transport routes and viewpoints. Where significant effects are identified, these are typically limited to the construction phase and early years of operation and reduce over time as proposed mitigation planting establishes. Mitigation measures, including the retention and reinforcement of existing hedgerows, provision of new native planting, and appropriate set-back distances from site boundaries, are secured through the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]**. These measures are designed to filter and screen views of the Scheme from surrounding roads and to integrate the Scheme into the receiving landscape. The preparation, approval and implementation of detailed landscape and ecological management plans,

Reference	Theme	Comments/Issues Raised	Applicant's Response
			substantially in accordance with the **OLEMP [APP-283]** and **EPMS [APP-284]**, are secured through requirements in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that the identified mitigation measures are delivered and maintained throughout the lifetime of the Scheme. The Applicant notes that matters relating to the use of agricultural land have been addressed in the Applicant's responses to this Interested Party above.
KH-013	Climate Change and Energy Need Transport and Access	During the two year construction phase, which involves the transport from China of 1000's of tonnes of metal and glass impregnated with toxic chemicals, the single track country lanes will be widened to accommodate heavy lorries. The lanes will be modified to have especially built passing places. These lanes run through villages not equipped to deal with volumes of heavy traffic. There will be a lasting negative effect on communities.	Island Green Power is part of the Solar Energy UK Supply Chain Commitment. As part of this, the solar sector in the UK and Europe has launched the Solar Stewardship Initiative, which independently inspects and certifies individual factories for sustainable and ethical practices. The Applicant would expect to source panels from factories that are SSI-accredited. The effects of emissions generated from embodied carbon within products to be used on site (as well as construction, operation and decommissioning emissions) are all considered in **ES Volume 1, Chapter 7: Climate Change [APP-059].** The CO2e figures are included in detail within the ES chapter. The chapter concludes that the emissions from these sources would be outweighed by the reduced emissions as a result of the Scheme contributing to decarbonisation of energy from the National Grid. The effects of construction traffic on the local highway network are assessed in **ES Volume 1, Chapter 13: Transport and Access [APP-065]**, which considers construction vehicle routing, traffic volumes and potential

Reference	Theme	Comments/Issues Raised	Applicant's Response
			impacts on highway safety and road condition. The assessment concludes that, with appropriate management measures in place, construction traffic effects can be appropriately controlled. Mitigation measures to manage construction traffic and protect local roads are set out in the **Outline Construction Traffic Management Plan (CTMP) [APP-287]**. The CTMP has been developed to minimise impacts on the local highway network and includes measures for routing, scheduling of deliveries and liaison with the local highway authority. A road condition and dilapidation survey of minor roads not typically used by HGV traffic is included as a measure within the CTMP. Any damage to verges or carriageway surfaces caused by construction vehicles will be rectified to the satisfaction of the local highway authority. The preparation, approval and implementation of the final CTMP, substantially in accordance with the **outline CTMP [APP-287],** are secured through Requirement 15 of Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring construction traffic impacts, including potential damage to local roads, are appropriately managed throughout the construction phase of the Scheme.
KH-014	Socio-Economics, Tourism and Recreation	I asked Island Green Power, in one obligatory consultation, what their plans are for maintaining public rights of way. I was not given any answer except it will be	The Applicant confirms that consideration of impacts to PROWs have been assessed in **ES Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** and the supporting **ES Volume 3 Appendix 16-2 Tourism and Recreation Receptor Tables [APP-241]**. No significant

Reference	Theme	Comments/Issues Raised	Applicant's Response
		'looked into'. This is hardly definitive when bridleways, footpaths and byways will be either lined by, covered by, or surrounded by solar panels and security fencing.	adverse effects are considered likely to occur at any phase of the Scheme, subject to the construction, transport, PROW, and landscape mitigation measures being implemented, set out in the various control documents and management plans and as secured by the relevant requirements in Schedule 2 to the **Draft DCO [APP-016]**. Specific control measures to protect and maintain PROWs are set out in the **OPROWPPMP [APP-282].** The Scheme design retains the alignment of all PROWs, all of which have been given minimum 15 m offsets from their centrelines to the nearest onsite infrastructure, such as security fencing. This buffer space would be planted with either hedgerows or low-level ground cover planting to encourage either visual screening, or improve biodiversity. These are shown on **ES Volume 2, Figures 3-4-1 to 3-4-5.2 [APP-084]** and secured through the **OLEMP [APP-283]**.
KH-015	Noise and Vibration	The whole construction has motorised panels. They will be audible every time the 1000's of them rotate to track the sun.	An assessment of the effects of the Scheme on noise and vibration is provided in **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**, with supporting technical information supplied in **ES Volume 3, Appendix 14-4: Noise Modelling [APP-237]**. The assessment considers potential noise and vibration impacts during construction, operation and decommissioning, including from solar PV panels and associated infrastructure. The conclusions of the assessment in relation to each phase of the Scheme are set out below. The conclusions of the assessments are made for the Scheme as a whole (i.e. all of its components combined, including the BESS), and therefore any specific

Reference	Theme	Comments/Issues Raised	Applicant's Response
			component will not have any greater effects than those that have been assessed. The Applicant notes that the approach to noise and vibration has been discussed with Wiltshire Council, as described in Section 14.2 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**. In addition, further meetings have been held over the approach to the management plans, and a Statement of Common Ground will be issued and updated throughout examination. The noise impacts from the operation of the Scheme and its components are assessed in Section 14.10 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**, with supporting modelling provided in **ES Volume 3, Appendix 14-4: Noise Modelling [APP-237]**. The predicted noise levels from the Solar PV Sites have been artificially increased by 3 dB to account for the increased likelihood that the noise from the Scheme would be perceived as distinct from the existing background sound. Potential mitigation measures are detailed in Section 14.9 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**, and with such measures in place, significant effects from operational noise are not expected. The **Outline Operational Environmental Management Plan [APP-278]** commits to noise levels from the Scheme at residential dwellings being the same as or below those modelled in the ES. This provides assurance that significant effects from operational noise will be avoided, while allowing flexibility in how this is achieved.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			The preparation, approval and implementation of the detailed OEMP, substantially in accordance with the outline plan, are secured through Requirement 14 of Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring operational noise is appropriately controlled throughout the lifetime of the Scheme.
KH-016	Noise and Vibration	The massive battery storage system -acres of combustible batteries - are within far too close proximity (as close as 500m) of one village and many other dwellings.	As a result of updated Scheme design for DCO submission, BESS infrastructure is proposed more than 500 m away from the nearest dwelling. At this distance, impact to health and wellbeing from air quality, fire or explosion impacts are minimal. As such, there are no significant adverse effects to human health anticipated as a result of the Scheme, as assessed in **ES Volume 1, Chapter 18: Human Health [APP-070]**. The location of the BESS has been informed by a detailed site selection and design evolution process, as set out in **ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP-056]**. This chapter explains that land at Lime Down D was identified as an appropriate location for the BESS due to its proximity to the solar PV arrays and the on-site substation, providing operational benefits including minimising transmission losses, maximising storage efficiency, and enabling rapid and reliable grid response. In considering options for co-locating the BESS with the solar PV Sites, Lime Down D was selected as the preferred location due to its central position within the Scheme, effective natural and proposed screening, limited proximity to residential properties, and closeness to existing infrastructure corridors, including the railway line. Locating the BESS within an existing infrastructure

Reference	Theme	Comments/Issues Raised	Applicant's Response
			corridor reduces the need for additional land take and avoids introducing new isolated infrastructure into undeveloped areas. The assessment concludes that siting the BESS at Lime Down D presents the lowest potential for significant adverse environmental effects. Accordingly, the proximity of the BESS to the railway line does not give rise to significant safety or environmental concerns. The potential effects of toxic gases arising in the unlikely event of a BESS fire, are assessed in **ES Volume 1, Chapter 15: Air Quality [APP-067]**, which models potential emissions and evaluates impacts on sensitive receptors within a 1 km radius of the BESS area, including residential properties and Public Rights of Way. The assessment concludes that no significant off-site air quality impacts are predicted should a fire event occur. In the unlikely event of a fire, the precautionary measures set out in the **Outline Battery Safety Management Plan [APP-286]**, such as advice to remain indoors and close windows, would further reduce potential effects on nearby residents. The Applicant has followed guidance from the National Fire Chiefs Council (NFCC) and commissioned a Plume Assessment Study to model toxic gas emissions and visibility impacts from a BESS fire on all sensitive receptors within a 1km radius of the BESS area (**ES Volume 3, Appendix 15-2: BESS Fire Emissions Modelling [APP-239])**. The fire emissions modelled in the report were based upon recent UK Health Security Agency (UKHSA) requests for DCO BESS projects which explore both immediate air quality impacts together with annual UK air quality requirements.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Six worst case BESS fire locations (i.e. locations within the BESS Area closest to sensitive receptors) have been modelled as depicted in **ES Volume 2, Figure 15-5: Battery Energy Storage System Fire Emissions [APP-166]**. The Concentrations of carbon monoxide (CO), formaldehyde, hydrogen chloride (HCl), hydrogen cyanide (HCN), hydrogen fluoride (HF), ammonia (NH_3), nitrogen dioxide (NO2) and particulates from a potential BESS fire have been modelled using an air quality dispersion model to determine the likely effects on human health. A high-level visibility assessment has also been undertaken using the modelled particulates results to determine the effect of BESS fire emissions on visibility on the local road and rail network to inform the **Outline Battery Safety Management Plan (OBSMP) [APP-286]**. The Plume Assessment Study has concluded that there are no significant toxic emission or visibility impacts at all sensitive receptor locations. The Applicant has also committed to commissioning an additional Plume Analysis Study at the detailed design stage of the project as stipulated in Section 5.5.9 of the OBSMP and secured through Requirement 6 of the **Draft DCO [APP-016]**. As now mandated under National Fire Protection Association (NFPA) 855 (2026), the Applicant will only be able to select a BESS system that has undertaken Large Scale Fire Testing (LSFT). At the detailed design stage, the selected BESS LSFT data will be leveraged to fully inform inputs for risk assessment tools which will be utilised together with detailed consequence modelling to provide a comprehensive site operations and emergency

Reference	Theme	Comments/Issues Raised	Applicant's Response
			response safety audit – this is secured in the OBSMP via pre-construction requirements. Section 5 of the OBSMP covers all requisite firefighting requirements for the Scheme, including fire service access, firefighting water supply, and emergency planning requirements. The Applicant notes that the approach to BESS safety is under discussion with Dorset & Wiltshire Fire & Rescue Service (D&WFRS) and this will be set out in the relevant Statement of Common Ground.
KH-017	Climate Change and Energy Need	This construction is hiding under the banner of providing 'green' energy. It will, I understand, take 15 years to offset the damage done during shipping/construction.	The effects of emissions generated from embodied carbon within products to be used on site, as well as construction, operation and decommissioning emissions, are assessed in **ES Volume 1, Chapter 7: Climate Change [APP-059].** The CO_2e figures are included in detail within this ES chapter. Emissions from production of the required cables are included within the assessment. The chapter concludes that the emissions from these sources would be outweighed by the reduced emissions resulting from the Scheme contributing to decarbonisation of energy from the National Grid. Further, as outlined in the chapter, the emissions of replacing the solar panels, inclusive of the embodied carbon (manufacturing and transportation emissions), are considered in the assessment. The DESNZ conversion factors used for the assessment of embodied carbon cover the extraction, primary processing, manufacture and transportation of materials.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			The assessment recognises that the manufacture and transport of solar PV panels and batteries represent a notable proportion of the Scheme's lifecycle GHG emissions. These impacts are considered within the context of national carbon budgets and the UK's transition to net zero, with the assessment concluding that the Scheme would make a meaningful contribution to reducing greenhouse gas emissions over its operational lifetime when compared to a 'without Scheme' scenario. In addition, **ES Volume 1, Chapter 20: Other Environmental Matters [APP-072]** considers the use of materials and natural resources, including minerals, materials supply. Baseline and future conditions are set out in Section 7.7 of the assessment. Although it is expected there will be some baseline emissions from the Site's current use and some carbon sequestration from the grassland once the Scheme is in place, as a conservative approach the baseline emissions and the grassland sequestration were considered zero. The Applicant's **Statement of Need [APP-266]** provides evidence that an unprecedented capacity of new low-carbon generation schemes is urgently needed for the UK to meet its legally binding climate change targets. The government has confirmed that solar energy is at the heart of the Clean Power 2030 Mission [NPS EN-3 (2025) Paras 2.10.1 & 2.10.2]. The Statement of Need confirms that the need for the Scheme is urgent and that substantial weight should be given to the need for the Scheme [NPS EN-1 (2023) Para 3.2.9-3.2.10]. The Applicant is confident that

Reference	Theme	Comments/Issues Raised	Applicant's Response
			the proposed management and mitigation measures set out in the **Environmental Statement [APP-052 to APP-265]** are comprehensive and robust and that the Scheme aligns with national and local planning policy; this is outlined in the **Planning Statement [APP-267]**. Of particular relevance are Annex A: National Policy Statement Accordance Tables and Annex B: Local Policy Accordance Tables, of the Planning Statement which set out an appraisal of the Scheme against national and local planning policies.
KH-018	Hydrology, Flood Risk and Drainage	This area has its water run off managed by drainage ditches. We get flooding here and impassable roads when rain is heavy. The run off will be increased by over a million solar panels.	An assessment of the effects of the Scheme on flood risk both within the Site and the surrounding area is provided in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [APP-063],** with supporting information provided in **ES Volume 3, Appendix 11-1 to 11-9: Flood Risk Assessment and Drainage Strategy [APP-210 to APP-218]**. The assessment concludes that, with the embedded mitigation measures secured, the Scheme would not result in a material increase in off-site flood risk, including to adjacent communities and downstream receptors, and that any on-site flood risk would be managed such that the Scheme remains safe and operable for its lifetime. The assessment has been prepared in accordance with national policy and best practice guidance and in consultation with the Environment Agency and Lead Local Flood Authority and is set out in the relevant **Statement of Common Ground** to be submitted at Deadline 1. The **Outline Construction Environmental Management**

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Plan (CEMP) [APP-277] has been developed to control construction-phase risks and ensure there is no material increase in off-site flood risk. In accordance with NPS EN-3 (paragraph 2.10.84), the assessment differentiates between solar PV panel areas, which drain to the existing ground and therefore do not generally give rise to significant drainage effects, and associated infrastructure (for example access tracks, temporary construction compounds, substations and the BESS) where runoff controls are required. Where drainage measures are necessary, these include permeable surfacing, infiltration features, swales and attenuation storage to manage surface water and maintain greenfield runoff behaviour, as applicable. Requirement 13 in Schedule 2 to the **Draft DCO [APP-016]** secures that part of the authorised development can commence until, a CEMP is submitted to and approved by the relevant planning authority. The CEMP must be substantially in accordance with the Outline CEMP, and all construction works associated must be carried out in accordance with the approved CEMP.
KH-019	Other Environmental Matters	The panels have a black surface. IGP say they 'should not' generate heat.	Evidence from published research indicates that large-scale solar arrays do not give rise to significant or widespread heat island effects. An 18-month study by Fthenakis and Yu (2013) found that solar arrays are typically fully cooled during night-time hours, meaning that sustained heat retention and associated heat island effects are unlikely to occur. Further research by Barron-Gafford et al. (2016) concluded that any temperature increases associated with

Reference	Theme	Comments/Issues Raised	Applicant's Response
			solar PV installations are localised and do not extend beyond the immediate boundary of the solar farm. As such, any microclimatic effects are limited in extent and rapidly dissipate with distance from the panels. On this basis, the microclimate and heat island effects associated with the Scheme are not considered to be significant, and no meaningful thermal stress, discomfort or change in local weather conditions is anticipated for nearby residents or surrounding land uses.
KH-020	Ecology and Biodiversity	Pathways used by wildlife will be blocked by fencing. This is not the odd field affected - the panels alone will cover one hundred 20 acre fields. The whole affected area, once building is complete will be 7x2 miles. Industrial sites of this mega size do not belong in the countryside utilising farmland. Panels belong on roofs. We have 100's of acres of factory roofs near the M4 junction 17 alone. Why don't these have panels?	Wildlife Movement Potential effects of boundary treatments and fencing on ecology and wildlife movement are assessed in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**, which considers impacts on habitats and species during construction, operation and decommissioning and identifies measures to avoid or mitigate barriers to wildlife movement. The Scheme design incorporates fencing around the Solar PV Arrays that is permeable to wildlife, with the exception of deer. This means animals (excluding deer only) will be able to freely access habitats within the Solar PV Sites without the need for wildlife gates. In addition, wide buffers are retained around the peripheries of the Solar PV Sites to allow wildlife, including deer, to move between favoured habitats. These measures are described in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]** and secured in the **Outline Ecological Protection and Mitigation Strategy (OEPMS) [APP-284]**.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Fencing will be subject to regular inspection and maintenance to ensure continued permeability to wildlife and effective functioning over the lifetime of the Scheme. Measures for ongoing ecological management and maintenance, including re. fencing, are set out in the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]**. The preparation, approval and implementation of the detailed Ecological Protection and Mitigation Strategy and Landscape and Ecological Management Plan, substantially in accordance with the **EPMS [APP-284]** and **OLEMP [APP-283]**, are secured through Requirements 8 and 7 respectively in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that fencing design and maintenance measures are delivered and maintained throughout the lifetime of the Scheme. The Applicant notes that the approach to the assessment in relation to ecology and biodiversity in general is under discussion with Wiltshire Council and Natural England and is set out in the relevant Statement of Common Ground to be submitted at Deadline 1. <u>Agricultural Land and Site Selection</u> An assessment of the potential effects of the Scheme on soils and agricultural land is provided in **ES Volume 1, Chapter 17 Soils and Agriculture [APP-069]**. This chapter considers baseline agricultural land quality, including Best and Most Versatile (BMV) land, and assesses likely significant effects arising from

Reference	Theme	Comments/Issues Raised	Applicant's Response
			construction, operation and decommissioning of the Scheme, together with embedded mitigation measures. The areas of each Agricultural Land Classification (ALC) grade affected by the Scheme are set out in **ES Volume 1, Chapter 17:Soils and Agriculture [APP-069]**, Section 17.7. Of the agricultural land within the Solar PV Sites, approximately 477.4 hectares (around 67%) is classified as Subgrade 3b or Grade 4 and is therefore not BMV land. There is no Grade 1 land, around 30.8 hectares (approximately 4%) of Grade 2 land, and approximately 209.3 hectares (around 29%) of Subgrade 3a land. The distribution of ALC grades is shown in **ES Volume 2, Figure 17-2: Agricultural Land Classification Mapping [APP-172]**. The Applicant has had regard to agricultural land quality in the design and site selection process and has sought, where practicable, to locate infrastructure on lower quality land. The Scheme will result in a temporary but long-term and reversible loss of agricultural land for the operational life of the Scheme. As set out in **ES Volume 1, Chapter 17: Soils and Agriculture [APP-069]**, Section 17.10, this gives rise to a temporary, long-term moderate adverse effect on agricultural land overall, and a temporary, long-term major/moderate adverse effect on BMV land, both of which are assessed as significant. These effects are fully reported in the ES and are a matter for the Secretary of State to weigh in the planning balance against the need for the Scheme and its wider benefits. There are no significant permanent effects on agricultural land, as all land will be returned to its original use and condition as far as

Reference	Theme	Comments/Issues Raised	Applicant's Response
			practicable following decommissioning. The Applicant notes that the approach to assessing the quality of the agricultural land is under further discussion with Natural England and is set out in the relevant **Statement of Common Ground** to be submitted at Deadline 1. Measures to avoid and minimise effects on soils and agricultural land are embedded within the Scheme design and secured through the DCO. These include the preparation and implementation of a **Soil Resources Management Plan (SRMP) [APP-280]**, which will control soil handling, storage and reinstatement during construction, operation and decommissioning, and a requirement to prepare and implement a Decommissioning Strategy in accordance with the **Outline Decommissioning Strategy [APP-279]**. Through the establishment and maintenance of long-term grassland beneath and between the solar arrays, soil health, quality and structure are anticipated to improve over the lifetime of the Scheme, resulting in a temporary, moderate beneficial effect on soil resources at decommissioning, which is assessed as significant (**ES Volume 1 Chapter 17: Soils and Agriculture [APP-069]**, Sections 17.10 and 17.12). In relation to suggestions that brownfield land or alternative locations should be used, including rooftop, these matters are addressed in **ES Volume 1, Chapter 4 Alternatives and Design Evolution** and in the **Statement of Need**

Reference	Theme	Comments/Issues Raised	Applicant's Response
			[APP-056 and APP-266]. The Applicant has considered alternatives, including previously developed land and other forms of solar deployment, as part of the site selection and design evolution process. As shown in Table 2-2 of **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]**, the Applicant has considered previously developed land/ brownfield land over 1 hectare within the area of search, based on the brownfield land registers of the relevant Local Planning Authorities, and concluded that none of the sites are large enough to provide a viable land parcel of at least 40 ha and sites were not considered to be available as they have planning permission for residential development and/or are allocated for residential/mixed use development. National policy and government guidance, as set out in the **Statement of Need [APP-266]**, recognise that while rooftop and smaller-scale solar installations are an important part of the energy mix, they cannot alone meet the scale of capacity required to achieve clean power and net zero objectives. Large-scale ground-mounted solar therefore remains necessary in addition to, not instead of, rooftop solar.
KH-021	Community Benefits	There is no benefit to the local community as all power will go to the national grid. This is via underground cables for 10k. More destruction. It will pass around towns and under the M4.	The Applicant acknowledges that any adverse effects from the Scheme are more likely to be felt locally than the largely wider-scale benefits of the Scheme. The Scheme is anticipated to help meet the UK's net zero requirements for energy production, which is considered a critical national priority and set out in National Policy Statements for Energy NPS EN-1 (section 4.2) and EN-3. This therefore will benefit the national population rather than just the local population.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			The Scheme is also anticipated to benefit the population within approximately 20km of the Scheme, through providing employment and income especially during construction and peak replacement activities, and providing skills and training opportunities. Where the Scheme is anticipated to benefit local people more specifically, this is done through providing onsite permissive paths to increase access to the countryside, providing improved landscape planting through reinforcing existing hedgerows and planting of new trees, providing biodiversity net gains through habitat improvements. That notwithstanding, the Applicant is committed to providing a Community Benefit Fund to allow for community-driven benefits that are not necessarily associated with the Scheme itself. The purpose is to establish a means to recognise local community needs that the Applicant wants to be able to contribute towards in recognition of the local impact of the Scheme. The Community Benefit Fund is separate from the DCO process, and so is not bound to the same timescales or information requirements as submitted information. Furthermore, community benefits are legally immaterial to planning decisions and cannot be considered when deciding whether to grant planning consent. The Applicant acknowledges this and so has sought to provide the Community Benefit Fund voluntarily even though it won't add favourable weight in the planning balance.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			<u>Cable Route Corridor</u> The Applicant confirms that the existing National Grid Melksham substation has been identified as the point of connection. This decision was based on available capacity, network resilience, and strategic grid planning. As explained in **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]**, an initial search area was identified at a 5 km radius from the POC, however this was later expanded as no suitable and available sites within 5 km were identified. The search area was enlarged incrementally to a 20 km radius which is considered by the Applicant to be a viable cable connection distance for a solar project of this scale. The POC and 20 km search area is shown on Figure 1, Annex C of **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]**. More details on how the Cable Route Corridor has been located and designed can be found in **ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP-056]**. Several factors were considered designed to take a direct route whilst following existing features, such as roads, and avoiding sensitive receptors as far as practicable, such as habitat designations, residential and commercial properties, heritage assets, and a large number of land interests. The construction of the cable route has been assessed throughout the **ES [APP-052 to APP-265]**, which considers the likely significant construction effects

Reference	Theme	Comments/Issues Raised	Applicant's Response
			associated with these works. The **ES [APP-052 to APP-265]** assesses the cable route within defined parameters, including limits on working width and trench dimensions, to ensure that a reasonable worst-case scenario is assessed. The detailed design and construction of the cable route would be undertaken within the parameters assessed and authorised by the DCO. Measures to manage and minimise construction effects, including reinstatement of land following installation, are set out in the **Outline Construction Environmental Management Plan (CEMP) [APP-277]**. Requirement 13 in Schedule 2 to the **Draft DCO [APP-016]** secures that part of the authorised development can commence until, a CEMP is submitted to and approved by the relevant planning authority. The CEMP must be substantially in accordance with the Outline CEMP, and all construction works associated must be carried out in accordance with the approved CEMP.
KH-022	Description and DCO Process	Every day I have difficulty believing this outlandish plan is even being considered. It is a foreign company - the same company invited here to bankrupt (Redacted) - so you can expect profits to go abroad.	The Applicant, Lime Down Solar Park Limited is a 100% subsidiary of IGP UK Projects Limited. Both are registered in England and Wales and subject to UK tax law and regulations. Investment may come from a range of sources, including international ones. This is common practice with UK infrastructure Schemes and helps fund the transition to clean energy at the scale required. The **Funding Statement [APP-019]** submitted with the DCO application demonstrates that the Scheme is financially viable and adequately funded to deliver the Scheme in full.

Reference	Theme	Comments/Issues Raised	Applicant's Response
KH-023	Description and DCO Process	Please accept that this scheme is not wanted by Wiltshire Council nor any of the residents whose way of life will be destroyed. No one is against solar power but not like this.	The DCO process anticipates that differing views may be expressed by consultees, including local authorities, and such representations will be considered by the Examining Authority alongside all other evidence submitted. The Applicant engaged with Wiltshire Council, the host local planning authority, throughout the pre-application process and will continue to do so during Examination. Matters raised by the authority have informed the development of the Scheme and the accompanying assessments, and are addressed within the application documents. The Applicant will respond in detail to the local planning authority's representations through the Examination process, including via Written Representations, Statements of Common Ground and, where appropriate, at Examination hearings, to assist the Examining Authority in its consideration of the application.
KH-024	Description and DCO Process Soils and Agriculture Landscape and Visual	I am not in support of the proposed Lime Down solar 'farm'. I object to the misnomer of the name 'Lime Down' as this suggests a single area whereas it is 5 separate areas totalling 2,000 acres. This, therefore, not only removes this area of farmland from producing food but all the land between them is affected too. So the area taken up by this oversized monstrosity covers an	As set out in **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]**, the Applicant undertook an initial review which did not identify a single site of the appropriate size (1,100 ha) within the area of search. Therefore, the Applicant considered both contiguous land parcels and land parcels near one another. The **Statement of Need [APP-266]** explains at Section 7.4 that NSIP proposals may comprise adjoining or separate parcels of land and that "*the connection of separate parcels of suitable land together into a single scheme may, subject to analysis, enable those parcels of land to connect economically to the electricity system*" which is the case

Reference	Theme	Comments/Issues Raised	Applicant's Response
		area of approximately 7x3 sq miles. This does not include miles of cable corridor. The panels themselves are not to be discretely concealed behind hedges but are 4m tall. That is more than1/2 the height of telegraph poles and will therefore be looming over hedges along several miles of country lanes bordering 6 villages and encroaching on the South Cotswolds, an area of outstanding natural beauty.	for this scheme. Section 8.2 of the **Statement of Need [APP-266]** explains that by bringing the parcels together into a single scheme, the Scheme is able to carry a connection to the National Electricity Transmission System (NETS), thus providing a local source of low carbon electricity and also enabling the efficient bulk transfer of energy generated at the Scheme so that any surplus can be used to cover shortfalls elsewhere. By connecting to the NETS, the Scheme will not impact the feasibility or timing of distribution network connections for either new generation or consumption connections which among other things are required to support the delivery of Wiltshire County Council's growth plans. Food security The potential effects of the Scheme on agricultural land are assessed in **ES Volume 1, Chapter 17 Soils and Agriculture [APP-069]**, which considers baseline agricultural land use and quality and evaluates likely effects during construction, operation and decommissioning. The assessment confirms that the Scheme will result in a temporary and reversible loss of agricultural land during the operational period, with all land to be returned to its original use and condition as far as practicable following decommissioning. No permanent loss of agricultural land is anticipated. The Applicant does not consider that food security will be compromised by the Scheme (or solar energy more widely). The latest figures to September 2024 indicate that solar occupied around 21,200 ha of agricultural land in the

Reference	Theme	Comments/Issues Raised	Applicant's Response
			UK. In 2025, 545,000 ha of arable land in England were left uncropped (source: Department for Environment, Food & Rural Affairs, Agricultural land use in England at 1 June 2025). It should also be noted that food security is not identified as an issue within the suite of Energy National Policy Statements or the National Planning Policy Framework (NPPF). Further, the Government's UK Solar Roadmap (2025) states that solar development is not considered to compromise food security, but that the climate and nature crisis poses the greatest long-term risk to food security- a risk which the Scheme directly helps to address by providing a secure, low-carbon source of electricity. As set out in Section 2 of the **Outline Decommissioning Strategy [APP-279],** post-decommissioning of the Scheme, the landowners would choose how the land is to be used and managed. The landowner may return all of the land to arable use, although it is likely that established habitats such as hedgerows and woodland would be retained given their potential benefits to agricultural land and the wider farming estate. Cable Route The construction of the cable route has been assessed throughout the **ES [APP-052 to APP-265]**, which considers the likely significant construction effects associated with these works. The **ES [APP-052 to APP-265]** assesses the cable route within defined parameters, including limits on working width and trench dimensions, to ensure that a reasonable worst-case scenario is assessed.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			The detailed design and construction of the cable route would be undertaken within the parameters assessed and authorised by the DCO. Measures to manage and minimise construction effects, including reinstatement of land following installation, are set out in the **Outline Construction Environmental Management Plan (CEMP) [APP-277]**. Requirement 13 in Schedule 2 to the **Draft DCO [APP-016]** secures that part of the authorised development can commence until, a CEMP is submitted to and approved by the relevant planning authority. The CEMP must be substantially in accordance with the Outline CEMP, and all construction works associated must be carried out in accordance with the approved CEMP. <u>Landscape and Visual</u> The height of the solar PV panels has been assessed using clearly defined design parameters, including a maximum height of 4.5 metres above ground level at maximum tilt, as set out in **ES Volume 1, Chapter 3: The Scheme [APP-055]**. These parameters represent a realistic worst-case scenario for the purposes of the Environmental Impact Assessment. Mitigation measures to address landscape and visual effects, including measures that reduce the perceived height and prominence of panels in views, are set out in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060], Figure 3-4-1 to 3-4-5.2 Landscape and Ecology Mitigation Plan [APP-084]** and secured within the **Outline Landscape and Ecological Management Plan**

Reference	Theme	Comments/Issues Raised	Applicant's Response
			(OLEMP) [APP-283]. These include new and enhanced planting, retention of existing hedgerows and woodland, and landscape integration measures to reduce visual effects over time. The LVIA assesses the effectiveness of the mitigation measures over time and concludes that, in the majority of locations, where significant adverse visual effects are recorded, the visual effects would reduce to non-significant as mitigation planting establishes and matures. This demonstrates that the proposed mitigation is effective in reducing the visual effects of the Scheme. On this basis, a maximum panel height of 4.5m is not considered excessive. The preparation, approval and implementation of the detailed Landscape and Ecological Management Plan, substantially in accordance with the **OLEMP [APP-283]**, are secured through Requirement 7 in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that the identified mitigation measures are delivered and maintained throughout the lifetime of the Scheme. <u>Cotswolds National Landscape</u> The Cotswolds National Landscape (CNL) is fully assessed as a standalone receptor within **ES Volume 3, Appendix 8.6: Assessment of Effects on the Special Qualities of the Cotswolds National Landscape [APP-197]**. This assessment considers the effects of the Scheme on landscape character, visual amenity and the special qualities of the CNL, including tranquillity.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			The assessment found that there would be some short term impact to landscape character within the setting of the CNL but due to the avoidance measures embedded within the Scheme, harm to the CNL itself would be minimal with beneficial effects in the long term which would further the purposes of the designation. In respect of visual amenity, some short-term adverse effects would be experienced by a small number of visual receptors with views to and from the CNL. However, these would reduce over time as a result of the proposed mitigation. The assessment of effects on the special qualities of the CNL scoped out 3 SQs as there is no association with the Site. The assessment found that there are no direct effects on the remaining SQs. There are some Minor/ Negligible short-term effects on a small number of visual receptors within the setting of the CNL which effect SQ7 -Tranquillity and SQ13 Archaeology and historic associations. However, these effects are mitigated by Year 15 when proposed vegetation has matured. The assessment also found that there would be beneficial effects on SQ 6 – Biodiversity and nature recovery as a result of the delivery of approximately 119.7 hectares of flower-rich neutral grassland (as defined in the BNG assessment) and SQ 12 - An accessible landscape as a result of the delivery of approximately 12.8km of new permissive paths within the setting of the CNL. The remaining SQs would remain entirely intact. All land parcels adjacent to the CNL are proposed to deliver habitat enhancement, informed by the CNL Management Plan and the Cotswolds National Landscape Strategy and Guidelines, to further the purposes of the

Reference	Theme	Comments/Issues Raised	Applicant's Response
			designation. Details of the proposed landscape and ecological mitigation and enhancement measures such as the avoidance measures to remove panels from the boundary of CNL are provided in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060], Figure 3-4-1 to 3-4-5.2 Landscape and Ecology Mitigation Plan [APP-084]** and secured within the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283],** and the **Outline Ecological Protection and Mitigation Strategy (OEPMS) [APP-284]**.

6.11 Gary Hill

Table 6-11 RR-1494

Reference	Theme	Comments/Issues Raised	Applicant's Response
GH-001	Socio-Economics, Tourism and Recreation	My property will be within a 100M of impacted land and this will have a significant impact (potentially unsaleable impact) on the value of my property, I am retired and have spent my entire life saving and investing in my family home so that I could eventually downsize and realise capital in order to be able to retire, this will destroy the value I have saved for across decades and puts my entire retirement in jeopardy. This simply isnt fair and punishes hard working people in modest houses that are simply in the Lime Down firing line, there has been no offer of compensation and conversations with Lime Down representatives simply end with a shrug of shoulders and an attitude of "*thats tough*"!!	The potential for the Scheme to impact residential amenity has been assessed in **ES Chapter 8: Landscape and Visual [APP-060]** and **ES Chapter 18: Human Health [APP-072]**. Impacts on property values are not an Environmental Impact Assessment (EIA) topic and were scoped out of the assessment as there is no empirical evidence that large-scale solar farms cause significant long-term adverse effects on property prices. To protect the amenity of residents, the Scheme design incorporates substantial embedded mitigation, including a minimum offset of 50m between property boundaries and solar panels. The Landscape and Visual Impact Assessment (LVIA) found no significant long term visual effects to residential properties as a consequence of the Scheme. The visual effects of the Scheme are summarised in **ES Volume 3, Appendix 8-3-3 [APP-192]**. Temporary Major/Moderate and Moderate Adverse effects on visual receptors have been recorded across the Scheme during construction and at Year 1. However, for the majority of these receptors, the effects reduce to non –significant levels as a result of the embedded mitigation measures which are set out in Section 8.9 of **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]** and include landscape buffers, retention of existing hedgerows and woodland, and new planting to provide screening and integration over time. In the case of Pig Lane Cottages, the minimum distance between the property boundary and panel infrastructure is approximately 450m. Between panels and the property boundary there will be screening vegetation and ecological enhancements to maintain privacy and visual separation, as detailed in the **Outline Landscape and Ecological Management Plan (LEMP) [APP-283]**. The Applicant places a high value on constructive local dialogue and confirms that, following the resident's engagement at statutory events, a bespoke site visit and meeting with the developer took place to discuss the project's relationship with

Reference	Theme	Comments/Issues Raised	Applicant's Response
			their property where the extended offsets and proposed land use nearby were discussed.
GH-002	Other Environmental Matters Noise and Vibration Socio-Economics, Tourism and Recreation	I object to the BESS for additional reasons: continuous noise emissions, visual intrusion, and operational lighting that would permanently destroy the tranquillity of the area. The predicted 'incessant hum' from cooling fans, inverters, and transformers would severely impact residents' ability to sleep, enjoy their homes, or use their gardens.	Noise and Vibration An assessment of the effects of the Scheme on noise and vibration is provided in **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**, with supporting technical information supplied in **ES Volume 3, Appendix 14-4: Noise Modelling [APP-237]**. The assessment considers potential noise and vibration impacts during construction, operation and decommissioning, including from solar PV panels and associated infrastructure. The conclusions of the assessment in relation to each phase of the Scheme are set out below. The conclusions of the assessments are made for the Scheme as a whole (i.e. all of its components combined, including the BESS), and therefore any specific component will not have any greater effects than those that have been assessed. The Applicant notes that the approach to noise and vibration has been discussed with Wiltshire Council, as described in Section 14.2 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**. In addition, further meetings have been held over the approach to the management plans, and a Statement of Common Ground will be issued and updated throughout examination. The noise impacts from the operation of the Scheme and its components are assessed in Section 14.10 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**, with supporting modelling provided in **ES Volume 3, Appendix 14-4: Noise Modelling [APP-237]**. The predicted noise levels from the Solar PV Sites have been artificially increased by 3 dB to account for the increased likelihood that the noise from the Scheme would be perceived as distinct from the existing background sound. Potential mitigation measures are detailed in Section 14.9 of **ES**

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Volume 1, Chapter 14: Noise and Vibration [APP-066], and with such measures in place, significant effects from operational noise are not expected. The **Outline Operational Environmental Management Plan [APP-278]** commits to noise levels from the Scheme at residential dwellings being the same as or below those modelled in the ES. This provides assurance that significant effects from operational noise will be avoided, while allowing flexibility in how this is achieved. The preparation, approval and implementation of the detailed OEMP, substantially in accordance with the outline plan, are secured through Requirement 14 of Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring operational noise is appropriately controlled throughout the lifetime of the Scheme. <u>Landscape and Visual Impact</u> An assessment of landscape and visual effects is provided in the Landscape and Visual Impact Assessment (LVIA) presented in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**. The LVIA assesses effects on identified landscape and visual receptors, including residential properties and users of public rights of way, and identifies where significant effects may occur. The LVIA found no significant long term visual effects to Residential Properties as a consequence of the Scheme. The scale of development within the Order Limits has been significantly reduced from the layout assessed in the Preliminary Environmental Information Report (PEIR) through an iterative design process undertaken in response to consultation and in accordance with the mitigation hierarchy to avoid, reduce and

Reference	Theme	Comments/Issues Raised	Applicant's Response
			mitigate adverse effects. As part of this design evolution, panels along the edge of the Cotswolds National Landscape and along the Fosse Way have been removed. Mitigation measures to address landscape and visual effects are set out in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**, **Figure 3-4-1 to 3-4-5.2 Landscape and Ecology Mitigation Plan [APP-084]** and secured within the **Outline Landscape and Ecological Mitigation Plan (LEMP) [APP-283]** and the **Outline Ecological Protection and Mitigation Strategy (EPMS) [APP-284]**. These documents include proposals for new and enhanced planting, retention of existing hedgerows and woodland, and landscape integration measures to reduce visual effects over time. In addition, the Scheme design incorporates minimum offsets from existing landscape features, including residential properties, ancient woodland, woodland, hedgerows, public rights of way and watercourses, to further limit visual impacts. The preparation, approval and implementation of detailed landscape and ecological management plans, substantially in accordance with the **OLEMP [APP-283]** and **EPMS [APP-284]**, are secured through requirements in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that the identified mitigation measures are delivered and maintained throughout the lifetime of the Scheme. Potential effects relating to lighting are assessed in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**, which considers the implications of construction, operational and decommissioning lighting on landscape and visual receptors. The Landscape and Visual Impact Assessment (LVIA) has considered the construction, operational and decommissioning

Reference	Theme	Comments/Issues Raised	Applicant's Response
			lighting proposals for the Scheme, with details of lighting design, directionality and intermittent lighting set out in **ES Volume 1, Chapter 3: The Scheme [APP-055]** and further discussed in **ES Volume 1, Chapter 20: Other Environmental Matters [APP-072].** Lighting Potential effects relating to lighting are considered within the LVIA in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**, which considers the implications of construction, operational and decommissioning lighting on landscape and visual receptors. No significant effects of lighting, above those recorded for landscape and visual receptors, were recorded. The Landscape and Visual Impact Assessment (LVIA) has considered the construction, operational and decommissioning lighting proposals for the Scheme, with details of lighting design, directionality and intermittent lighting set out in **ES Volume 1, Chapter 3: The Scheme [APP-055]**. The Scheme has been designed to minimise the need for external lighting. Lighting is not required within the Solar PV Arrays during the operational phase. Motion-sensing security lighting will be provided within substations and the BESS Area and will be used only for maintenance and security purposes. Temporary site lighting during construction and decommissioning will be required to enable safe working during hours of darkness. This lighting will be designed, as far as reasonably practicable, to minimise light spill outside the Site and Cable Route Corridor, particularly towards residential properties, highways and ecological receptors. Standard good practice measures will be employed to minimise glare and light spill during construction, operation and decommissioning. There will be no lighting on

Reference	Theme	Comments/Issues Raised	Applicant's Response
			perimeter fencing. These measures to control construction lighting are set out in the **Outline Construction Environmental Management Plan [APP-277]**, and operational lighting controls form part of the **Outline Operational Environmental Management Plan [APP-278]**. The preparation, approval and implementation of detailed management plans, substantially in accordance with these outline plans, are secured through requirements in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring lighting impacts are appropriately controlled throughout the lifetime of the Scheme.
GH-003	Transport and Access Socio-Economics, Tourism and Recreation Landscape and Visual Human Health	I object to the construction traffic proposals, which rely on narrow rural lanes that are physically incapable of safely accommodating the volume of HGVs required. Independent analysis shows the applicant has underestimated traffic by over 40%, meaning more than 100 HGV movements per day on single-'track roads used by schoolchildren, walkers, cyclists, and local residents. This creates an unacceptable and unmanageable safety risk, particularly where there are no pavements, limited verges, blind bends, and multiple public rights of way. This level & size of traffic on rural lanes will cause absolute chaos, damage and poses significant risk to users of already narrow/blind bend lanes that simply are not capable of taking this volume of HGVs etc. Additionally residents heading out to work will be significantly impacted as	The potential effects of construction traffic on the local highway network are assessed in **ES Volume 1, Chapter 13: Transport and Access [APP-065]**, which considers construction vehicle movements, traffic volumes, road safety and effects on road users. This included the capacity of local roads and infrastructure to accommodate construction vehicles with consideration of construction traffic volumes, vehicle types, route suitability, and network performance. The assessment concludes that the level of construction traffic associated with the Scheme is unlikely to materially affect road safety on links within the Study Area, and no significant adverse effects on accident risk are anticipated. The assessment additionally concludes that with appropriate mitigation such as the Construction Traffic Management Plan in place to manage construction vehicle movements, there would be no significant adverse impacts on the local highway network during the construction, operation maintenance, and decommissioning phases of the Scheme. An **Outline Construction Traffic Management Plan (Outline CTMP) [APP-287]** has been prepared and submitted with the

Reference	Theme	Comments/Issues Raised	Applicant's Response
		these vehicles will be causing the chaos described and thousands of tradesman will be looking to find short cuts/rat runs to get onto the various sites across the vast development. A Limedown representative stated that the "build period which they estimate to be c2 years will be chaos and we should look to move away for as much of this period of time as possible because it will be carnage"! Additionally this impacts on active travel, local walks, and the Wiltshire Cycleway. The frequency of HGVs -" one every six minutes -" would intimidate vulnerable users, deter people from walking and cycling, and destroy the amenity value of routes that are central to community life and local tourism. This proposal will destroy the tranquillity, open views, wildlife, and quiet lanes that define this landscape. Many local walking/riding routes use the very lanes and rights of way that would be dominated by HGV traffic, construction noise, dust, and industrial fencing. What are currently peaceful, restorative walks would become unpleasant, unsafe, and in some cases effectively unusable. These walks are not incidental; they	DCO application. The aim of the CTMP is to ensure that the effect of the construction phase on the local highway network is minimised. The **Outline CTMP [APP-287]** secures measures to coordinate construction deliveries by HGVs to arrive and depart between 09:30 and 16:30 where possible, to avoid peak network hours of 08:00–09:00 and 17:00–18:00. It also includes a community liaison element to keep local communities informed about the construction process and to provide a contact for feedback should any issues arise. Compliance with the CTMP will be monitored by the Developer, Contractor and Wiltshire Council as local highway authority. The preparation, approval and implementation of the final CTMP, substantially in accordance with the outline CTMP, are secured through Requirement 15 of Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring construction traffic impacts are appropriately managed throughout the construction phase of the Scheme. The Applicant confirms that impacts to PROWs, unsurfaced roads, and the recreational use of the highway network have been assessed in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** and the supporting **ES Volume 3, Appendix 16-2 Tourism and Recreation Receptor Tables [APP-241]**. Consideration of the likely impact on views, character and the desirability of these routes to users has been fundamental to the assessment of likely significant effects. The Applicant confirms that the majority of significant adverse effects can be mitigated, however understands that some significant adverse effects to users of routes in Lime Down E cannot be mitigated further during construction. Otherwise, no significant adverse effects to PROW

Reference	Theme	Comments/Issues Raised	Applicant's Response
		are part of the parish's identity, wellbeing, and social fabric. They connect residents to nature, link villages, support local businesses, and attract visitors. The proposal would destroy the qualities that make these routes special, replacing them with noise, intimidation, and industrialisation. I fear there will be serious injury or worse case deaths caused by this volume and size of additional traffic, nobody wants this on their conscience!	and recreational highway users are anticipated at any phase of the Scheme. With specific regard to long-distance recreational routes such as the Wiltshire Way cycle route, a residual significant effect to the Wiltshire Way cycle route and Fosse Way during construction and decommissioning is anticipated. This assessment considers transport matters (safety and delay) but also user experience, amenity and desirability. As a result of the Scheme, and the implementation of mitigation measures to protect cyclist on this route, the Scheme is anticipated to generate a significant adverse effect to users of the Wiltshire Way during construction and decommissioning. The Scheme is however not anticipated to generate any long-term significant adverse effect on users of The Wiltshire Way during the Scheme's operational phase. The mitigation measures include providing banksmen and speed limits where accesses interact with PROWs and The Wiltshire Way, and through specifying HGV access routes to the Scheme. These are secured through the **Outline CTMP [APP-287]** and **Outline Public Rights of Way and Permissive Paths Management Plan (oPROWPPMP) [APP-282]** by Requirements 15 and 16 respectively in Schedule 2 to the **Draft DCO [APP-016]**. The assessment in **ES Volume 1, Chapter 18: Human Health [APP-070]** also considers the physical and mental health impacts of changes to recreation and countryside access under the assessment topic 'open space, leisure and play', and concludes that no significant adverse effects are anticipated at any phase of the Scheme. The Applicant confirms that existing PRoW are to be protected as far as practicable within the Scheme design, with management measures set out in the **oPROWPPMP [APP-282]**, confirmed as embedded mitigation in Section 16.9 **of ES**

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]. New permissive access routes have been incorporated into the Scheme design, shown as Work No. 10 on the **Works Plan [APP-007]** and illustrated on **ES Volume 2, Figure 3-4: Landscape and Ecology Mitigation Plan [APP-084]**. These are identified as additional mitigation and enhancement measures in Section 16.11 of ES Chapter 16. The PRoW and Permissive Paths Management Plan is secured through Requirement 16 of Schedule 2 of the **Draft Development Consent Order [APP-016]**. The preparation, approval and implementation of the detailed Construction Environmental Management Plan and Construction Traffic Management Plan, substantially in accordance with the outline plans, are secured through Requirements 13 and 15 respectively in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that impacts on PRoW and recreational routes are appropriately managed during construction. The approach to recreation and access has been discussed with Wiltshire Council's Public Health team and is under discussion with Wiltshire Council's Countryside Access Team and is set out in the relevant Statement of Common Ground to be submitted at Deadline 1. <u>Tourism and Recreation</u> The potential effects of the Scheme on tourism and recreation are assessed in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]**, supported by **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]**. The assessment considers baseline tourism activity, visitor attractions,

Reference	Theme	Comments/Issues Raised	Applicant's Response
			recreational assets and tourism-dependent businesses within the study area. The assessment evaluates potential effects on the use, enjoyment and desirability of nearby tourism destinations, including impacts on individual visitor attractions, recreational routes, events and businesses reliant on tourism. It also considers whether changes to landscape character or visual amenity could influence visitor behaviour. The assessment identifies a worst-case scenario in which a temporary loss of up to 50 tourism-related jobs could occur locally during construction, and a long-term loss of up to 11 tourism-related jobs could occur during the operational phase of the Scheme. This represents a precautionary estimate based on conservative assumptions. The assessment concludes that, while some localised effects on tourism receptors are anticipated to occur, significant adverse effects on the wider tourism economy are not anticipated. These findings are fully reported in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** and will be weighed in the planning balance alongside the Scheme's wider economic and environmental benefits. The Applicant notes that the approach to assessment of tourism impacts is under discussion with Wiltshire Council's Economic and Regeneration Team and is set out in the relevant Statement of Common Ground to be submitted at Deadline 1. <u>Landscape and Visual</u> An assessment of landscape and visual effects are presented in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			The Landscape and Visual Impact Assessment (LVIA) assesses effects on identified landscape and visual receptors, including residential properties, users of public rights of way and roads, and identifies where significant effects may occur. The **LVIA [APP-060]** found no significant long term visual effects to residential properties as a consequence of the Scheme. The visual effects of the Scheme are summarised in **ES Volume 3, Appendix 8-3-3 [APP-192]**. Temporary Major/Moderate and Moderate Adverse effects on visual receptors have been recorded across the Scheme during construction and at Year 1. However, for the majority of these receptors, the effects reduce to non –significant levels as a result of the embedded mitigation measures which are set out in Section 8.9 of **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]** and include landscape buffers, retention of existing hedgerows and woodland, and new planting to provide screening and integration over time. The assessment also identifies that there would be some long-term significant effects on the visual amenity of users of some localised footpaths, as a result of the Scheme. This predominantly relates to locations where footpaths diagonally cross fields and mitigation planting would be inappropriate to landscape character and the legacy landscape. Those receptors which would experience Significant Long Term Visual Effects are listed in Table 8-30 of the **LVIA [APP-060].** The scale of development within the Order Limits has been significantly reduced from the layout assessed in the Preliminary Environmental Information Report (PEIR) through an iterative design process undertaken in response to consultation and in accordance with the mitigation hierarchy to avoid, reduce and

Reference	Theme	Comments/Issues Raised	Applicant's Response
			mitigate adverse effects. As part of this design evolution, panels along the edge of the Cotswolds National Landscape and along the Fosse Way have been removed. Mitigation measures to address landscape and visual effects are set out in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**, **Figure 3-4-1 to 3-4-5.2 Landscape and Ecology Mitigation Plan [APP-084]** and secured within the **Outline Landscape and Ecological Mitigation Plan (LEMP) [APP-283]** and the **Outline Ecological Protection and Mitigation Strategy (EPMS) [APP-284]**. These documents include proposals for new and enhanced planting, retention of existing hedgerows and woodland, and landscape integration measures to reduce visual effects over time. In addition, the Scheme design incorporates minimum offsets from existing landscape features, including residential properties, ancient woodland, woodland, hedgerows, public rights of way and watercourses, to further limit visual impacts. Although these measures reduce the effects of the Scheme on nearly all receptors, as noted above there are 10 receptors which would experience Significant Visual Effects for the duration of the Scheme as set out Table 8-30 of the **LVIA [APP-060]**. Mitigation measures to address landscape and visual effects are set out in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]** and **Figure 3-4-1** to **3-4-5.2 Landscape and Ecology Mitigation Plan (OEMPS) [APP-084]**. The preparation, approval and implementation of detailed landscape and ecological management plans, substantially in accordance with the **OLEMP [APP-283]** and **OEPMS [APP-284]**, are secured through requirements in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that the identified mitigation measures are delivered and maintained throughout the lifetime of the Scheme.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			<u>Wildlife</u> Potential impacts on ecology and biodiversity are fully assessed in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061].** This assessment considers baseline ecological conditions and evaluates likely significant effects arising during the construction, operation and decommissioning phases of the Scheme. It identifies avoidance, mitigation and enhancement measures to address potential impacts on habitats and protected and notable species. It also identifies opportunities for ecological enhancement, including the creation and long-term management of habitats, and delivery of biodiversity net gain. The Applicant notes that the approach to the assessment in relation to ecology and biodiversity in general is under discussion with Wiltshire Council and Natural England and is set out in the relevant Statement of Common Ground to be submitted at Deadline 1**.** During construction, specific measures are proposed to avoid disturbance and displacement of wildlife. These include protective buffers around sensitive habitats and features, timing restrictions on vegetation clearance, pre-construction ecological surveys, species-specific mitigation, and pollution prevention controls which are set out in the **Outline Ecological Protection and Mitigation Strategy (EPMS) [APP-284**]. Measures to protect trees and hedgerows are also set out in **ES Volume 1, Chapter 10: Arboriculture [APP-062]**. The Scheme will also result in the cessation of intensive arable farming within the Solar PV Sites. As identified in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**, this is expected to reduce the ongoing application of herbicides and pesticides, supporting improvements in habitat quality over the operational lifetime of the Scheme. The reversion of existing

Reference	Theme	Comments/Issues Raised	Applicant's Response
			arable land within the Solar PV Sites to predominantly grasslands habitats can be expected to benefit a wide range protected and notable species, as identified in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061].** Mitigation and enhancement measures are detailed in the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]** and the **Outline Ecological Protection and Mitigation Strategy (OEPMS) [APP-284]**, which set out habitat creation, species protection measures, buffer zones and long-term ecological management. The preparation, approval and implementation of the detailed Landscape and Ecological Management Plan, substantially in accordance with the **OLEMP [APP-283]**, are secured through Requirement 7 in Schedule 2 of the **Draft Development Consent Order [APP-016]**. The preparation, approval and implementation of the detailed Ecological Protection and Mitigation Strategy, substantially in accordance with the **OEPMS [APP-284]**, are secured through Requirement 8 in Schedule 2 of the **Draft Development Consent Order [APP-016]**. These requirements ensure that ecological protection and enhancement measures are delivered and maintained throughout construction and operation of the Scheme. <u>Construction Noise and Vibration</u> An assessment of the effects of the Scheme on noise and vibration is provided in **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**, with supporting technical information supplied in **ES Volume 3, Appendix 14-4: Noise Modelling [APP-237]**. The assessment considers potential noise and vibration impacts during construction, operation and decommissioning, including from solar PV panels and associated

Reference	Theme	Comments/Issues Raised	Applicant's Response
			infrastructure. The conclusions of the assessment in relation to each phase of the Scheme are set out below. The conclusions of the assessments are made for the Scheme as a whole (i.e. all of its components combined, including the BESS), and therefore any specific component will not have any greater effects than those that have been assessed. The Applicant notes that the approach to noise and vibration has been discussed with Wiltshire Council, as described in Section 14.2 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**. In addition, further meetings have been held over the approach to the management plans, and a **Statement of Common Ground** will be issued and updated throughout examination. <u>Construction phase</u> The noise and vibration impacts arising from construction activities are assessed in Section 14.10 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**. For the purposes of the assessment, a reasonable worst-case scenario assuming piling activities has been considered. Mitigation measures associated with construction activity, such as temporary screens and advanced warning of works, are presented in Section 14.9 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]** and are committed to through the **Outline Construction Environmental Management Plan [APP-277]**. With these measures in place, the assessment concludes that no significant effects from construction noise or vibration are expected. A noise monitoring programme agreed with Wiltshire Council will be carried out during construction, as committed to in the **Outline Construction Environmental Management Plan [APP-277]**. The preparation, approval and implementation of the Construction Environmental Management Plan, substantially in

Reference	Theme	Comments/Issues Raised	Applicant's Response
			accordance with the **Outline CEMP [APP-277]**, is secured through Requirement 13 in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that construction noise and vibration effects are appropriately controlled. <u>Dust</u> An assessment of the effects of the Scheme on air quality (including the risk of increased pollution) is provided in **ES Volume 1, Chapter 15: Air Quality [APP-067]**, which considers potential air quality impacts during construction, operation and decommissioning. The assessment examines dust emissions, vehicle emissions, non-road mobile machinery emissions, back-up generator emissions and emissions associated with a the unlikely event of a potential BESS fire. Supporting technical assessments are provided in **ES Volume 3, Appendix 15-1: Construction Dust Methodology and Assessment [APP-238]** and **ES Volume 3, Appendix 15-2: BESS Fire Emissions Modelling [APP-239]**. The assessment concludes that, with embedded mitigation measures in place, the Scheme would not give rise to significant adverse air quality effects at human or ecological receptors. Mitigation measures to control construction dust, vehicle emissions and plant emissions are set out in the **Outline Construction Environmental Management Plan [APP-277]**, which includes measures such as dust suppression and site management controls. Additional measures to control construction vehicle emissions are set out in the **Outline Construction Traffic Management Plan [APP-287],** which includes restrictions on construction traffic routing and timing.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			The preparation, approval and implementation of the detailed Construction Environmental Management Plan, Construction Traffic Management Plan, Operational Environmental Management Plan and Battery Safety Management Plan, substantially in accordance with the outline plans, are secured through requirements in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that air quality impacts are appropriately controlled throughout the construction and operation of the Scheme.
GH-004	Landscape and Visual Ecology and Biodiversity	I also object to the environmental and landscape harm caused by industrial fencing, large-'scale visual structures, and the fragmentation of wildlife habitats. The proposal contradicts local and national Landscape Recovery objectives by creating impermeable barriers that block natural wildlife movement and erode the rural character of the area.	An assessment of landscape and visual effects is provided in the Landscape and Visual Impact Assessment (LVIA) presented in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**. The LVIA assesses effects on identified landscape and visual receptors, including residential properties and users of public rights of way, and identifies where significant effects may occur. The LVIA found no significant long term visual effects to Residential Properties as a consequence of the Scheme. The scale of development within the Order Limits has been significantly reduced from the layout assessed in the Preliminary Environmental Information Report (PEIR) through an iterative design process undertaken in response to consultation and in accordance with the mitigation hierarchy to avoid, reduce and mitigate adverse effects. As part of this design evolution, panels along the edge of the Cotswolds National Landscape and along the Fosse Way have been removed. Mitigation measures to address landscape and visual effects are set out in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**, Figure 3-4-1 to 3-4-5.2 **Landscape and Ecology Mitigation Plan [APP-084]** and secured within the **Outline Landscape and Ecological Mitigation Plan (LEMP) [APP-283]** and the **Outline Ecological Protection and Mitigation Strategy (EPMS) [APP-284]**. These documents include

Reference	Theme	Comments/Issues Raised	Applicant's Response
			proposals for new and enhanced planting, retention of existing hedgerows and woodland, and landscape integration measures to reduce visual effects over time. In addition, the Scheme design incorporates minimum offsets from existing landscape features, including residential properties, ancient woodland, woodland, hedgerows, public rights of way and watercourses, to further limit visual impacts. The preparation, approval and implementation of detailed landscape and ecological management plans, substantially in accordance with the **OLEMP [APP-283]** and **EPMS [APP-284]**, are secured through requirements in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that the identified mitigation measures are delivered and maintained throughout the lifetime of the Scheme. Potential impacts on ecology and biodiversity are fully assessed in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**. This assessment considers baseline ecological conditions and evaluates likely significant effects arising during the construction, operation and decommissioning phases of the Scheme. It identifies avoidance, mitigation and enhancement measures to address potential impacts on habitats and protected and notable species. It also identifies opportunities for ecological enhancement, including the creation and long-term management of habitats, and delivery of biodiversity net gain. The assessment concludes that, with the identified embedded and additional mitigation measures in place, no unacceptable significant adverse effects on ecology and biodiversity are anticipated. The Applicant notes that the approach to the assessment in relation to ecology and biodiversity in general is under discussion with Wiltshire Council and Natural England and is set out in the relevant **Statements of Common Ground** to be submitted at

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Deadline 1. During construction, specific measures are proposed to avoid disturbance and displacement of wildlife. These include protective buffers around sensitive habitats and features, timing restrictions on vegetation clearance, pre-construction ecological surveys, species-specific mitigation, and pollution prevention controls which are set out in the **Outline Ecological Protection and Mitigation Strategy (EPMS) [APP-284]**. Measures to protect trees and hedgerows are also set out in **ES Volume 1, Chapter 10 Arboriculture [APP-062]**. The Scheme will also result in the cessation of intensive arable farming within the Solar PV Sites. As identified in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**, this is expected to reduce the ongoing application of herbicides and pesticides, supporting improvements in habitat quality over the operational lifetime of the Scheme. The reversion of existing arable land within the Solar PV Sites to predominantly grassland habitats can be expected to benefit a wide range protected and notable species, as identified in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**. Mitigation and enhancement measures are detailed in the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]** and the **Outline Ecological Protection and Mitigation Strategy (OEPMS) [APP-284]**, which set out habitat creation, species protection measures, buffer zones and long-term ecological management. The preparation, approval and implementation of the detailed Landscape and Ecological Management Plan, substantially in accordance with the **OLEMP [APP-283]**, are secured through Requirement 7 in Schedule 2 of the **Draft Development Consent Order [APP-016]**. The preparation, approval and

Reference	Theme	Comments/Issues Raised	Applicant's Response
			implementation of the detailed Ecological Protection and Mitigation Strategy, substantially in accordance with the O**EPMS [APP-284]**, are secured through Requirement 8 in Schedule 2 of the **Draft Development Consent Order [APP-016]**. These requirements ensure that ecological protection and enhancement measures are delivered and maintained throughout construction and operation of the Scheme. The Applicant is confident that the proposed management and mitigation measures set out in the **Environmental Statement [APP-052 to APP-265]** are comprehensive and robust and that the Scheme aligns with national and local planning policy; this is outlined in the **Planning Statement [APP-267]**. Of particular relevance are Annex A: National Policy Statement Accordance Tables and Annex B: Local Policy Accordance Tables, of the Planning Statement which set out an appraisal of the Scheme against national and local planning policies.
GH-005	Socio-Economics, Tourism and Recreation Ecology and Biodiversity	Crucially, I object because the impacts are wide spread. The land within and around the proposed site is a shared rural asset used daily by residents from Norton, Farleaze, Foxley, Corston, Rodbourne, Sherston, Grittleton, and many other communities. They rely on this landscape for its rights of way, tranquillity, open views, wildlife, and the sense of separation between settlements. The proposal would industrialise these shared spaces, replacing a permeable, wildlife rich environment with fencing, noise, traffic, and infrastructure that	A detailed assessment of the likely significance of effects from the Scheme on the use and desirability of individual PRoWs and recreational access to the countryside is included in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** and **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]**. This assessment considers the impact on individual recreational routes, including their practical use, enjoyment and desirability. The assessment finds no significant residual effects to individual PROWs or the PROW network overall. However, residual significant effects are anticipated to some long-distance recreation routes during all phases of the Scheme due to their regional or national importance. The assessment in **ES Volume 1, Chapter 18: Human Health [APP-070]** goes on to assess the physical and mental health impacts of changes to recreation and countryside access under

Reference	Theme	Comments/Issues Raised	Applicant's Response
		would degrade the experience for every community around the site	the assessment topic 'open space, leisure and play', finding that no significant adverse effects are anticipated at any phase of the Scheme. The Applicant notes that the approach to recreation and access to the countryside has been agreed with Wiltshire Council's Public Health team and is currently being discussed with Wiltshire Council's Countryside Access Team. This is set out in the Statement of Common Ground with Wiltshire Council to be submitted at Deadline 1. Consultation with Wiltshire Council's Public Health Team has informed the approach to mental health considerations, as documented in **ES Volume 3, Appendix 18-1: Human Health Consultation [APP-244].** Through this engagement, the Applicant has committed to signposting locally available mental health and wellbeing resources to members of the public engaging with the Scheme, using information provided by Wiltshire Council's Public Health Team. The Applicant will continue to monitor consultation responses relating to mental health and will provide appropriate signposting to existing local support services where requested. The Applicant notes that the assessment methodology for health and wellbeing has been agreed with Wiltshire Council's Public Health team and is set out in the relevant Statement of Common Ground to be submitted at Deadline 1. The Applicant furthermore refers to the commitment for the provision of a community liaison group to be set up prior to construction commencing, who will act as the go-to body for queries, complaints or communication between members of the public and the construction contractors. This is secured through Requirement 4 of Schedule 2 to the **Draft DCO [APP-016]**. The Applicant also notes that these matters have been addressed in the Applicant's responses to this Relevant Representation above.

Reference	Theme	Comments/Issues Raised	Applicant's Response
GH-006	Socio-Economics, Tourism and Recreation Description and DCO Process Ecology and Biodiversity	This is not a localised impact. It is a regional loss of amenity, affecting thousands of people who walk, cycle, ride, and enjoy this landscape as part of their daily lives. The proposal would erase the rural qualities that bind these communities together and define this part of the South Cotswolds. In summary, the so-called 'Lime Down Solar Park' is a misnamed, inappropriate, and fundamentally unacceptable industrial proposal. It places an intolerable burden on the entire area and its neighbouring villages, industrialises a cherished landscape, endangers residents, fragments wildlife habitats, and permanently damages the environment and community life across the wider area. For these reasons, I strongly object to the proposal in its entirety.	The Applicant notes that these matters have been addressed in the Applicant's responses to this Relevant Representation above.
GH-007	Soils and Agriculture	This proposed development is enormous and covers circa 2,500 acres of agricultural land and placing major infrastructure - including a Battery Energy Storage System (BESS), substation, and solar arrays - just 300 metres from many homes. The entire village of Hullavington and Farleaze would lie within one mile of the proposed BESS itself, meaning every resident would be directly exposed to the risks, impacts, and consequences of this installation.	The Applicant has followed National Fire Chiefs Council (NFCC) guidance and commissioned a Plume Assessment Study to model toxic gas emissions and visibility impacts from a BESS fire on all sensitive receptors within a 1km radius of the BESS area. The fire emissions modelled in the report were based upon recent UK Health Security Agency (UKHSA) requests for DCO BESS projects which explore both immediate air quality impacts together with annual UK air quality requirements. The UKHSA is a statutory consultee for the Scheme and has confirmed that they are satisfied with the Applicant's submitted documentation and Plume Assessment Study methodology and results.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Six worst case BESS fire locations (i.e. locations within the BESS Area closest to sensitive receptors) have been modelled as depicted in **ES Volume 2, Figure 15-5: Battery Energy Storage System Fire Emissions Study Area [APP-166]**. The concentrations of carbon monoxide (CO), formaldehyde, hydrogen chloride (HCl), hydrogen cyanide (HCN), hydrogen fluoride (HF), ammonia (NH_3), nitrogen dioxide (NO2) and particulates from a potential BESS fire have been modelled using an air quality dispersion model to determine the likely effects on human health. A high-level visibility assessment has also been undertaken using the modelled particulates results to determine the effect of BESS fire emissions on visibility on the local road and rail network to inform the **Outline Battery Safety Management Plan (OBSMP) [APP-286].** The Plume Assessment Study has concluded that there are no significant toxic emission or visibility impacts at all sensitive receptor locations. The Applicant has also committed to commissioning an additional Plume Analysis Study at the detailed design stage as stipulated in Section 5.5.9 of the OBSMP and secured through the DCO: *"..at the detailed design stage a BESS system and site specific Plume Analysis study will be conducted to assess the environmental impact of a site incident to sensitive receptors within a 1 km radius. Toxic gas emissions to sensitive receptors must be below relevant public health exposure limit guidelines when the battery system of a BESS is fully consumed (burnt out), production of Particulate Matter (PM) and a visibility impact assessment on any transport links within a 1 km radius of the BESS area will also be included. The ERP produced at the detailed design stage (template outlined in Section 5.4.9 -5.4.11) will incorporate all necessary emergency response procedures*

Reference	Theme	Comments/Issues Raised	Applicant's Response
			and actions based upon thermal runaway test data supplied by the BESS system provider." As now mandated under NFPA 855 (2026) the Applicant will only be able to select a BESS system that has undertaken Large Scale Fire Testing (LSFT). At the detailed design stage, the selected BESS LSFT data will be leveraged to fully inform inputs for risk assessment tools which will be utilised together with detailed consequence modelling to provide a comprehensive site operations and emergency response safety audit, this is stipulated in the OBSMP pre-construction requirements (Section 6). An **OBSMP [APP-286]** has been prepared for the Scheme using guidance from Dorset and Wiltshire Fire and Rescue Service and incorporating recommendations of the National Fire Chiefs Council. The safety objectives for the design of the BESS site are listed in Section 2.4 of the OBSMP. The OBSMP will be amended at Deadline 1 to fully accommodate the latest BESS safety requirements contained in NFPA 855 (2026) ensuring that any credible risks associated with battery storage are either prevented or fully mitigated if a BESS failure occurs. Section 2.4.2 of the OBSMP stipulates that: *"Final BESS design and site layout will have been validated through mandatory Large Scale Fire Testing (LSFT) and rigorous consequence modelling to minimise the requirement for any D&WFRS intervention in a thermal runaway incident. LSFT must establish minimum equipment spacing distances that demonstrate there is no fire propagation to adjacent BESS enclosures or ESS equipment. D&WFRS intervention in worst case scenarios would typically be limited to boundary cooling of adjacent BESS and Energy Storage System (ESS) units to prevent the fire from spreading. This strategy will be finalised with D&WFRS and be clearly communicated in the Emergency Response Plan (ERP);*

Reference	Theme	Comments/Issues Raised	Applicant's Response
			• *To ensure that fire, smoke, and any release of toxic gases does not significantly impact site operatives, first responders, and the local community; and* • *To ensure that firewater run-off is contained and tested before release or, if necessary, removed by tanker and treated offsite."* As set out in the **OBSMP [APP-286]**, the BESS Area will have a robust and validated Emergency Response Plan (ERP), developed in consultation with Dorset & Wiltshire Fire and Rescue Service at the detailed design stage. Section 5.4 of the OBSMP specifies the typical emergency response protocols, procedures and safety information that will be included in ERPs. ERPs will be drafted and approved for all stages of the Scheme, including construction, operation and decommissioning. The Applicant's ERP template includes all requirements specified in both NFCC and NFPA 855 guidance and recommendations. Section 5 of the OBSMP covers all requisite firefighting requirements for the Scheme including fire service access, firefighting water supply, and emergency planning requirements. The Applicant is currently drafting a **Statement of Common Ground** with the Environment Agency (EA) on Scheme environmental protection issues including the BESS area drainage strategy. The agreed strategy document will be appended to the OBSMP at Deadline 1, to provide further assurance that all water pollution risks from a BESS fire are fully mitigated. The EA is a statutory consultee for the OBSMP and drainage strategies and must approve the final BSMP and drainage design at detailed design before construction of the BESS commences. The **OBSMP [APP-286]** is secured through Requirement 6 (Battery safety management) in Schedule 2 of the **Draft DCO [APP-016]**, which provides that Work No. 2 must not commence until a Battery Safety Management Plan has been submitted to

Reference	Theme	Comments/Issues Raised	Applicant's Response
			and approved by the relevant planning authority. The approved plan must be substantially in accordance with the Outline Battery Safety Management Plan. The Draft DCO also requires the relevant planning authority to consult with Dorset and Wiltshire Fire and Rescue Service and the Environment Agency before determining the application, and that the Battery Safety Management Plan must be implemented as approved.
GH-008	Hydrology, Flood Risk and Drainage	This proximity is not merely a matter of visual or acoustic intrusion. It represents a civil-'contingency-'level risk too serious to contemplate. Large-'scale lithium battery systems carry internationally recognised hazards associated with thermal runaway, fire, explosion, and toxic plume generation. These events are rare but catastrophic, and emergency planners treat them with extreme caution. No credible mitigation has been proposed for a failure event of this nature - and in reality, none could be envisaged. The applicant has not demonstrated how a major incident could be contained, controlled, or prevented from affecting the village, the school, the surrounding communities, or the nearby mainline railway. The siting of the BESS so close to homes and critical infrastructure is wholly inappropriate and represents an unacceptable and unmanageable risk to public safety.	The Applicant has followed National Fire Chiefs Council (NFCC) guidance and commissioned a Plume Assessment Study to model toxic gas emissions and visibility impacts from a BESS fire on all sensitive receptors within a 1km radius of the BESS area. The fire emissions modelled in the report were based upon recent UK Health Security Agency (UKHSA) requests for DCO BESS projects which explore both immediate air quality impacts together with annual UK air quality requirements. The UKHSA is a statutory consultee for the Scheme and has confirmed that they are satisfied with the Applicant's submitted documentation and Plume Assessment Study methodology and results. Six worst case BESS fire locations (i.e. locations within the BESS Area closest to sensitive receptors) have been modelled as depicted in **ES Volume 2, Figure 15-5: Battery Energy Storage System Fire Emissions Study Area [APP-166]**. The concentrations of carbon monoxide (CO), formaldehyde, hydrogen chloride (HCl), hydrogen cyanide (HCN), hydrogen fluoride (HF), ammonia (NH_3), nitrogen dioxide (NO2) and particulates from a potential BESS fire have been modelled using an air quality dispersion model to determine the likely effects on human health. A high-level visibility assessment has also been undertaken using the modelled particulates results to determine the effect of BESS fire emissions on visibility on the local road and rail network to inform the **Outline Battery Safety Management Plan (OBSMP) [APP-286].**

Reference	Theme	Comments/Issues Raised	Applicant's Response
			The Plume Assessment Study has concluded that there are no significant toxic emission or visibility impacts at all sensitive receptor locations. The Applicant has also committed to commissioning an additional Plume Analysis Study at the detailed design stage as stipulated in Section 5.5.9 of the OBSMP and secured through the DCO: "*..at the detailed design stage a BESS system and site specific Plume Analysis study will be conducted to assess the environmental impact of a site incident to sensitive receptors within a 1 km radius. Toxic gas emissions to sensitive receptors must be below relevant public health exposure limit guidelines when the battery system of a BESS is fully consumed (burnt out), production of Particulate Matter (PM) and a visibility impact assessment on any transport links within a 1 km radius of the BESS area will also be included. The ERP produced at the detailed design stage (template outlined in Section 5.4.9 -5.4.11) will incorporate all necessary emergency response procedures and actions based upon thermal runaway test data supplied by the BESS system provider*." As now mandated under NFPA 855 (2026) the Applicant will only be able to select a BESS system that has undertaken Large Scale Fire Testing (LSFT). At the detailed design stage, the selected BESS LSFT data will be leveraged to fully inform inputs for risk assessment tools which will be utilised together with detailed consequence modelling to provide a comprehensive site operations and emergency response safety audit, this is stipulated in the OBSMP pre-construction requirements (Section 6). An **OBSMP [APP-286]** has been prepared for the Scheme using guidance from Dorset and Wiltshire Fire and Rescue Service and incorporating recommendations of the National Fire Chiefs

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Council. The safety objectives for the design of the BESS site are listed in Section 2.4 of the OBSMP. The OBSMP will be amended at Deadline 1 to fully accommodate the latest BESS safety requirements contained in NFPA 855 (2026) ensuring that any credible risks associated with battery storage are either prevented or fully mitigated if a BESS failure occurs. Section 2.4.2 of the OBSMP stipulates that: *"Final BESS design and site layout will have been validated through mandatory Large Scale Fire Testing (LSFT) and rigorous consequence modelling to minimise the requirement for any D&WFRS intervention in a thermal runaway incident. LSFT must establish minimum equipment spacing distances that demonstrate there is no fire propagation to adjacent BESS enclosures or ESS equipment. D&WFRS intervention in worst case scenarios would typically be limited to boundary cooling of adjacent BESS and Energy Storage System (ESS) units to prevent the fire from spreading. This strategy will be finalised with D&WFRS and be clearly communicated in the Emergency Response Plan (ERP);* *• To ensure that fire, smoke, and any release of toxic gases does not significantly impact site operatives, first responders, and the local community; and* *• To ensure that firewater run-off is contained and tested before release or, if necessary, removed by tanker and treated offsite."* As set out in **OBSMP [APP-286]**, the BESS Area will have a robust and validated Emergency Response Plan (ERP), developed in consultation with Dorset & Wiltshire Fire and Rescue Service at the detailed design stage. Section 5.4 of the OBSMP specifies the typical emergency response protocols, procedures and safety information that will be included in ERPs. ERPs will be drafted and approved for all stages of the Scheme, including construction, operation and decommissioning. The Applicant's ERP template includes all requirements specified in both NFCC and NFPA 855 guidance and recommendations.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Section 5 of the OBSMP covers all requisite firefighting requirements for the Scheme including fire service access, firefighting water supply, and emergency planning requirements. The Applicant is currently drafting a **Statement of Common Ground** with the Environment Agency (EA) on Scheme environmental protection issues including the BESS area drainage strategy. The agreed strategy document will be appended to the OBSMP at Deadline 1, to provide further assurance that all water pollution risks from a BESS fire are fully mitigated. The EA is a statutory consultee for the OBSMP and drainage strategies and must approve the final BSMP and drainage design at detailed design before construction of the BESS commences. The **OBSMP [APP-286]** is secured through Requirement 6 (Battery safety management) in Schedule 2 of the **Draft DCO [APP-016]**, which provides that Work No. 2 must not commence until a Battery Safety Management Plan has been submitted to and approved by the relevant planning authority. The approved plan must be substantially in accordance with the Outline Battery Safety Management Plan. The Draft DCO also requires the relevant planning authority to consult with Dorset and Wiltshire Fire and Rescue Service and the Environment Agency before determining the application, and that the Battery Safety Management Plan must be implemented as approved.

6.12 Rory Sweet

Table 6-12 RR-4076

Reference	Theme	Comments/Issues Raised	Applicant's Response
RST-001	Site selection and Alternatives Climate Change and Energy Need	This development is completely inappropriate in location and should be in an industrial area or along motorways instead of beautiful countryside. The whole net zero concept is flawed anyway and all this is doing is reducing the value of our properties and ruining the countryside it is a disgrace.	National Policy Statement EN-3 Paras 2.10.11 and 2.10.18 explains that the availability of grid connection, suitable irradiance levels, and local topography are key inputs to the selection of sites suitable for large-scale solar generation developments. The number of locations within the UK at which large-scale solar generation is suitable is therefore likely to be limited, and this is a material issue when considering how the UK is to meet the urgent need for low carbon generation as is set out in the NPSs. This point is expanded upon in the **Statement of Need [APP-266]** in particular in Section 4.3. Chapter 8 of the **Statement of Need [APP-266]** provides evidence to support the suitability of the proposed location of the Scheme for large-scale solar plus storage in relation to the timeliness and availability of the grid connection, transmission system operability and the decarbonisation and energy security benefits the Scheme will bring forward from this location. As set out in **ES Volume 1, Chapter 4 Alternatives and Design Evolution [APP-056]** and the Site Selection Assessment Report at **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]** an appraisal of alternative sites within a 20km radius of the Existing National Grid Melksham Substation (being the grid connection location for this Scheme) has been undertaken, which concludes that there are no more suitable locations within the 20km search area than the proposed location for the Scheme. In relation to suggestions that brownfield land or alternative locations should be used, including rooftop, these matters are addressed in **ES Volume 1, Chapter 4 Alternatives and Design Evolution** and in the **Statement of Need [APP-056 and APP-266]**. The Applicant has considered alternatives, including previously developed land and other forms of solar deployment, as part of the site selection and design evolution process. As shown in Table 2-2 of **ES Volume 3, Appendix 4-1: Site**

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Selection Assessment Report [APP-185], the Applicant has considered previously developed land/brownfield land over 1 hectare within the area of search, based on the brownfield land registers of the relevant Local Planning Authorities, and concluded that none of the sites are large enough to provide a viable land parcel of at least 40 ha and sites were not considered to be available as they have planning permission for residential development and/or are allocated for residential/mixed use development. National policy and government guidance, as set out in the **Statement of Need [APP-266]**, recognise that while rooftop and smaller-scale solar installations are an important part of the energy mix, they cannot alone meet the scale of capacity required to achieve clean power and net zero objectives. Large-scale ground-mounted solar therefore remains necessary in addition to, not instead of, rooftop solar. In terms of the contribution of the Scheme to net zero, **ES Volume 1, Chapter 7: Climate Change [APP-059]** concludes that during the different stages of the Scheme (construction, operation and decommissioning), inevitable greenhouse gas (GHG) emissions will be generated with associated products, transport, energy and fuel-use. However, the GHG assessment shows that the emissions generated during construction of the Scheme will be totally offset by the clean energy generated during the operational phase, and the Scheme itself will provide beneficial impacts through a net reduction in GHG emissions compared to a scenario without the Scheme where energy must be generated by the baseline grid means and without the capacity for energy storage. Therefore, overall, there are beneficial significant residual effects on climate change anticipated as a result of the Scheme.

6.13 Victoria Brenner

Table 6-13 RR-4839

Reference	Theme	Comments/Issues Raised	Applicant's Response
VB-001	Human Health	We specifically moved to the middle of nowhere from a city for the mental health benefits - the fields of solar panels surrounding us will seriously impact this in a negative way.	Impacts on mental health and wellbeing are assessed in **ES Volume 1, Chapter 18: Human Health [APP-070]**. This chapter provides a comprehensive assessment of the Scheme's potential effects on human health, including mental health and wellbeing, through consideration of a broad range of health determinants. These include access to open space and recreation, transport and connectivity, community identity and cohesion, employment and income, noise and vibration, air quality, and access to health and social care services. The assessment applies a health "lens" to the findings of relevant technical chapters and concludes that, with the embedded mitigation and additional measures secured through the relevant management plans **[APP-277** to **APP-287]** secured by their respective requirements in Schedule 2 to the **Draft DCO [APP-016]**, the Scheme would not give rise to significant adverse effects on population health, including mental health and wellbeing. Mitigation measures include (but are not limited to) ensuring PROWs remain open as much as is practicable, HGV movements are set to defined routes and within set hours, community liaison and engagement is maintained, and construction impacts on noise and air quality are regulated. With specific regard to community liaison, this is directly secured through Requirement 4 in Schedule 2 to the **Draft DCO [APP-016]** through the provision of a community liaison group. This group will act as an intermediary between the public and the onsite contractors to ensure community concerns and any information they need are communicated and responded to, so as to reduce community anxiety and impacts on mental wellbeing, and to assist in directing the public to mental health support if required. The assessment in **ES Volume 1, Chapter 18: Human Health [APP-070]** focuses on communities within a 2 km Study

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Area surrounding the Scheme, identified as those most likely to experience potential health-related effects. Baseline analysis demonstrates that rates of poor mental health within the Study Area are generally lower than national averages, and the assessment considers potential pathways by which the Scheme could influence mental wellbeing, including changes to environment, amenity, access and community factors. Residual effects of the Scheme on health following mitigation are assessed as not significant at any phase of the Scheme. Consultation with Wiltshire Council's Public Health Team has informed the approach to mental health considerations, as documented in **ES Volume 3, Appendix 18-1: Human Health Consultation [APP-244].** Through this engagement, the Applicant has committed to signposting locally available mental health and wellbeing resources to members of the public engaging with the Scheme, using information provided by Wiltshire Council's Public Health Team. The Applicant will continue to monitor consultation responses relating to mental health and will provide appropriate signposting to existing local support services where requested. The Applicant notes that the assessment methodology for health and wellbeing has been agreed with Wiltshire Council's Public Health team and is set out in the relevant Statement of Common Ground to be submitted at Deadline 1.
VB-002	Socio-Economics, Tourism and Recreation	The value of my home has already decreased, and sale timeframe lengthened to goodness knows how long.	Impacts of the Scheme on property prices have not been assessed as these have been agreed by the Planning Inspectorate to be scoped out of assessment in the ES, as set out in **ES Volume 3, Appendix 1-2: Scoping Opinion Response Table [APP-181].**.
VB-003	Socio-Economics, Tourism and Recreation	Our home is at the end of a dead end track with no passing places, that is a haven for families of walkers / cyclists / riders who want or need to avoid traffic - again, the constant construction traffic	The closest construction route/link to this location is Fosse Way, and an assessment of this link is included at Annex H of **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233].**

Reference	Theme	Comments/Issues Raised	Applicant's Response
	Transport and Access	poses a serious risk - the death or injury of a dog or horse is significant in the face of months of large construction vehicles.	In regard to NMU users**, ES Volume 1, Appendix 13-1: Transport Assessment [APP-065]** at 13.10.42 assess the impact on Non-motorised user delay and amenity, including Fear and Intimidation. <u>NMU Delay</u> NMU delay is considered negligible given there is no existing pedestrian or cycle infrastructure on the construction routes and likely low numbers of existing NMU users. It is anticipated that PRoW which cross the Order Limits will generally remain open during the construction phase of the Scheme. There may be some slight perceptible delay to NMU movement if a construction vehicle is crossing a PRoW within the Order Limits. An **Outline PRoW and Permissive Path Management Plan [APP-282]** forms an embedded mitigation and will provide measures to ensure the effects of the construction phase on PRoW users is minimised. The **Outline PRoW and Permissive Path Management Plan [APP-282]** contain specific measures for the temporary diversion of footpath WT|GRIT|20 and bridleway WT|MALW|54, where access to Cable Route Corridor works east of Grittleton, and HGV access to Lime Down E are taken respectively. These diversions are proposed to ensure unreasonable effects to PROW users are not experienced during construction, replacement and decommissioning. <u>NMU Amenity</u> Pedestrian amenity is broadly defined as the relative pleasantness of a journey, and is considered to be affected by traffic flow, traffic composition and pavement width/separation from traffic. The construction routes on the road network have little existing pedestrian infrastructure and no footways, making

Reference	Theme	Comments/Issues Raised	Applicant's Response
			them already unattractive as walking routes with no pedestrian amenity so this cannot be assessed. Fear and Intimidation for other NMU's can be assessed. Highway widths of construction routes have been assessed **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233**] and provide sufficient width for HGV traffic to comfortably pass cyclists. **ES Volume 1, Appendix 13-1: Transport Assessment [APP-065]** concludes that the level of flow change will not result in a step change in fear and intimidation as defined in the **IEMA guidance at tables 3.1, 3.2** and **3.3**. **ES Volume 1, Appendix 13-1: Transport Assessment [APP-065]** concludes that on all links in the study area the significance of effect is Minor Adverse (temporary). <u>Mitigation</u> An **OCTMP [APP-287]** supports the DCO Application and presents outline measures which restrict construction deliveries to the proposed construction routes and separates the public and recreational users from hazards, including, traffic management measures such as signage and banksmen, fencing, and dust and noise control. An **OCTMP [APP-287]** supports the DCO Application and includes outline measures to minimise transport and access impacts as far as practicable. This includes road condition surveys to ensure any damage to the highway network caused by construction traffic is identified and rectified, management of construction deliveries to avoid the requirement for HGVs generated by the Scheme passing each other in opposite directions on the local roads, and restricted hours of deliveries outside of peak hours. A final CTMP would be prepared post consent and must be substantially in accordance with the

Reference	Theme	Comments/Issues Raised	Applicant's Response
			OCTMP [APP-287] and approved by the relevant local planning authorities. The **Outline CTMP [APP-287]** secures measures to coordinate construction deliveries by HGVs to arrive and depart between 09:30 and 16:30 where possible, to avoid peak network hours of 08:00–09:00 and 17:00–18:00. It also includes a community liaison element to keep local communities informed about the construction process and to provide a contact for feedback should any issues arise. Compliance with the CTMP will be monitored by the Developer, Contractor and Wiltshire Council as local highway authority. The preparation, approval and implementation of the final CTMP, substantially in accordance with the outline CTMP, are secured through Requirement 15 of Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring construction traffic impacts are appropriately managed throughout the construction phase of the Scheme.
VB-004	Landscape and Visual Transport and Access	On the original Lime Down applications the failed to recognise our home as a dwelling! It has since been recognised but AFTER the fields immediately adjacent to us have been selected for development. Lime Down Assessment documents confirm that the impact on our home of the construction and 1st year of operation will be "Major / Moderate / Adverse / Significant." There will be visible panels on both sides of our homes, less than 50m from our windows, which are currently completely rural with long views and incredible sunsets over Farmland and	The Applicant places significant value on local knowledge and confirms that the concerns of Grain Store Barn residents were afforded consideration through direct engagement including residents' participation in statutory consultation events, a dedicated site visit and a meeting with the Applicant where specific plans and localised impacts were discussed. As a direct result of this active dialogue and the iterative design process, the Applicant confirmed amendments to the Scheme to include a further setback of panel infrastructure away from these properties. These changes were confirmed to residents in writing and are reflected in the final application design, specifically within **ES Volume 2, Figure 3-1: Indicative Site Layout Plan [APP-081]** and the **Landscape and Ecology Mitigation Plan [APP-084]**.

Reference	Theme	Comments/Issues Raised	Applicant's Response
		the Fosse Way. Increased construction traffic on local single lane roads and tiny villages will pose a serious danger and risk of death or injury to local road users - dog walkers, horse riders, cyclists and school children. The Lime Down documentation confirms they will be impacted and will be high risk.	The Applicant confirms that the final application documentation accurately identifies residential receptors, including the Grain Store Barn, and acknowledges that a correction to a layer on one map during Statutory Consultation was corrected to show the property had been excluded from the project boundary. The proposed design incorporates screening and substantial buffers beyond the 50m minimum distance, to beyond a nearby telecoms line, to maintain the privacy and amenity of residents, as detailed in the **Outline Landscape and Ecological Management Plan (LEMP) [APP-283]**. The assessment presented in Annex H of **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]** demonstrates adequate carriageway width or frequency of passing place opportunity to pass at least an HGV and a light vehicle as requested in comments provided by Wiltshire Council in its response (August 2025) to the Transport Assessment Scoping Note and confirmed in Paragraph 4 of 'Appendix A - Highways and Transport Document Review - Detailed Comments'. This confirms that no passing bay or widening improvements are needed to accommodate these movements on the construction route outside of the Order Limits. The distances between passing points outside of the Order Limits are all within 150 m with forward visibility extending to the next passing point and beyond. This is within the generally accepted distance of 200 metres. As set out in the **Outline Construction Traffic Management Plan (Outline CTMP) [APP-287]**, a booking system will be set up to manage arrivals and departures to the Order Limits. This will be implemented in coordination with banksmen, which will be able to hold back any cross-over, should there be any delays on the roads. This will prevent HGVs generated by the Scheme passing each other in opposite directions on the local roads

Reference	Theme	Comments/Issues Raised	Applicant's Response
			forming part of the construction routes and will be confirmed as part of the final CTMP. Excessive widening of existing rural routes to allow two HGVs to pass would be over engineering, because of the following reasons: • temporary nature of the construction period; • trip generation of 50 HGVs on the route to Lime Down A-C is an estimate of the deliveries on a peak day, so does not represent a daily average; • trip generation of 50 HGVs on the route to Lime Down A-C is based on the worst-case assumptions, including but not limited to, all phases and Solar PV Sites being constructed simultaneously and a 50% uplift; • average number of HGV construction movements along the Route to Lime Down A-C route is only 32 per day/7 per hour/one every 8 minutes (less than the journey time along the route); • assuming a realistic construction programme, the average number of HGV construction movements along the route to Lime Down A-C is only 17 per day/less than 3 per hour/one every 25 minutes (less than the journey time along the route) • delivery times during the construction phase are limited to those times set out in the **Outline CTMP [APP-287]**. There will be no HGV trips outside of these hours; • impact on hedgerow, trees and character; and • low level of existing HGVs on the route to Lime Down A-C (average number of existing HGV movements is only 20 per day, with some of these movements occurring outside of proposed construction hours set out in the **Outline CTMP [APP-287]**.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Further detail of trip generation has also been added to **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]** which will be submitted at Deadline 1 of Examination. The **Outline CTMP [APP-287]** secures measures to coordinate construction deliveries by HGVs to arrive and depart between 09:30 and 16:30 where possible, to avoid peak network hours of 08:00–09:00 and 17:00–18:00. It also includes a community liaison element to keep local communities informed about the construction process and to provide a contact for feedback should any issues arise. Compliance with the CTMP will be monitored by the Developer, Contractor and Wiltshire Council as local highway authority. The preparation, approval and implementation of the final CTMP, substantially in accordance with the outline CTMP, are secured through Requirement 15 of Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring construction traffic impacts are appropriately managed throughout the construction phase of the Scheme. To provide further comfort, additional information has been added to **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]** which will be submitted at Deadline 1 of Examination. This demonstrates that there is adequate carriageway width and/or passing place opportunity for two HGVs.
VB-005	Human Health	We specifically moved to the middle of nowhere from a city for the mental health benefits - the fields of solar panels surrounding us will seriously impact this in a negative way.	Impacts on mental health and wellbeing are assessed in **ES Volume 1, Chapter 18: Human Health [APP-070]**. This chapter provides a comprehensive assessment of the Scheme's potential effects on human health, including mental health and wellbeing, through consideration of a broad range of health determinants. These include access to open space and recreation, transport and connectivity, community identity and cohesion, employment and income, noise and vibration, air quality, and access to health and social care services. The assessment applies a health "lens"

Reference	Theme	Comments/Issues Raised	Applicant's Response
			to the findings of relevant technical chapters and concludes that, with the embedded mitigation and additional measures secured through the relevant management plans **[APP-277** to **APP-287]** secured by their respective requirements in Schedule 2 to the **Draft DCO [APP-016]**, the Scheme would not give rise to significant adverse effects on population health, including mental health and wellbeing. Mitigation measures include (but are not limited to) ensuring PROWs remain open as much as is practicable, HGV movements are set to defined routes and within set hours, community liaison and engagement is maintained, and construction impacts on noise and air quality are regulated. With specific regard to community liaison, this is directly secured through Requirement 4 in Schedule 2 to the **Draft DCO [APP-016]** through the provision of a community liaison group. This group will act as an intermediary between the public and the onsite contractors to ensure community concerns and any information they need are communicated and responded to, so as to reduce community anxiety and impacts on mental wellbeing, and to assist in directing the public to mental health support if required. The assessment in **ES Volume 1, Chapter 18: Human Health [APP-070]** focuses on communities within a 2 km Study Area surrounding the Scheme, identified as those most likely to experience potential health-related effects. Baseline analysis demonstrates that rates of poor mental health within the Study Area are generally lower than national averages, and the assessment considers potential pathways by which the Scheme could influence mental wellbeing, including changes to environment, amenity, access and community factors. Residual effects of the Scheme on health following mitigation are assessed as not significant at any phase of the Scheme.

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			Consultation with Wiltshire Council's Public Health Team has informed the approach to mental health considerations, as documented in **ES Volume 3, Appendix 18-1: Human Health Consultation [APP-244].** Through this engagement, the Applicant has committed to signposting locally available mental health and wellbeing resources to members of the public engaging with the Scheme, using information provided by Wiltshire Council's Public Health Team. The Applicant will continue to monitor consultation responses relating to mental health and will provide appropriate signposting to existing local support services where requested. The Applicant notes that the assessment methodology for health and wellbeing has been agreed with Wiltshire Council's Public Health team and is set out in the relevant Statement of Common Ground to be submitted at Deadline 1.

6.14 Mostyn Neil Hamilton

Table 6-14 RR-3247

Reference	Theme	Comments/Issues Raised	Applicant's Response
MNH-001	Cultural Heritage	IN THE MATTER OF THE PLANNING ACT 2008 PINS Ref: EN010168 Application by Lime Down Solar Park Limited for an Order granting Development Consent for the 'Lime Down Solar Project' RELEVANT REPRESENTATIONS of NEIL HAMILTON, (Redacted) HERITAGE - ESPECIALLY, GRADE I LISTED BRADFIELD MANOR (Redacted) It is a medieval Gothic building dating back to the 14th century. From Domesday, until it was sold in 1992 by Mr John Branston, the manor was the centre of an agricultural unit, stretching northwards to the ancient woodland, Bradfield Wood. Mr Branston has put 180 acres of farm-land immediately surrounding Bradfield Manor into the Lime Down Solar (LDS) industrial complex. Lime Down is an invented name designed to sound 'cuddly' and it is the polar opposite of a 'park,' as it is misleadingly described. This 180 acres extends in an arc around Bradfield Manor from NE to SW, obliterating the landscape and filling virtually all the space between Bradfield Manor and Bradfield Wood. If LDS were built, it would completely wreck the setting of this Grade I listed building.	**ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, supported by **Appendix 12.1: Heritage Statement [APP-219],** identified that there was a potential for a moderate / minor adverse effect on Bradfield Manor Farmhouse, which is not significant (less than substantial harm at the lower end in NPPF terms). Site visits were undertaken with Historic England on the 28th March 2025, which included visiting land adjacent to Grade I Listed Bradfield Manor Farmhouse and Rodbourne Conservation Area. A second site visit with Historic England was undertaken in the grounds of Bradfield Manor Farmhouse on the 22nd May 2025 (see table 12-2 in **Chapter 12: Cultural Heritage [APP-064]**). Feedback provided during the site visits was used to inform the Scheme design and assessment provided in **Chapter 12: Cultural Heritage [APP-064].** As stated in **Appendix 12.1: Heritage Statement [APP-219]** when considering the contribution of setting to the significance of the Grade I Listed Bradfield Manor Farmhouse (NHLE: 1198808), the asset is largely defined and experienced from within the Bradfield Manor Farmhouse grounds, in particular the walled courtyard to the south-west of the asset, where the full architectural interest of its south-facing primary elevation can be appreciated. Lime Down D is located within agricultural land to the north of asset. Following advice provided by Historic England panels in Field D5 were set back away from Grade I Listed Bradfield Manor Farmhouse and enhanced screening is proposed along existing hedgerows. Views of the proposed BESS and 400 kV Substation from Bradfield Manor Farmhouse will be largely mitigated by the proposed new woodland belt along the south-eastern boundary of Field D3 which, in combination with the existing woodland block west of D1 and south of D22, provides extensive screening in views to and from Bradfield Manor Farmhouse. It was identified that there would be a moderate / minor (not significant) adverse effect to

Reference	Theme	Comments/Issues Raised	Applicant's Response
		Grade I listed buildings are exceptionally rare; there are only 9380 in the whole of England, 295 of which are in Wiltshire. They constitute less than 2.5% of all listed buildings. Most Grade I listings are for major national landmarks like Buckingham Palace, Westminster Abbey or, in Wiltshire, Salisbury Cathedral, Malmesbury Abbey and major stately homes like Longleat, Wilton House and Lacock Abbey. There are very few Grade I listed smaller residential dwellings like Bradfield Manor, which is a rare surviving medieval hall house. It is, therefore, a building of exceptional historic and architectural interest even within the category of Grade I buildings. The setting of which, and the views from its rooms above the ground floor, will be completely ruined by the proposed footprint of LD. LDS is a 'nationally significant infrastructure project'. But Grade I listed buildings are also 'nationally significant' and great weight should be given to preserving and protecting them from the kind of vandalism proposed here. In addition to the acres of solar panels, LDS has (Redacted) us with proposals for the BESS and a 400 kV transmission station. The former will include up to 200 shipping-container	the asset (less than substantial harm at the lower end in NPPF terms) as a result of indirect (i.e. setting) impacts. The Applicant wishes to clarify that there are no 50ft high pylons proposed in the application. The maximum possible envelope of the busbars associated with the 400kv substation have been assessed using clearly defined design parameters, up to a maximum height of 13 metres to the top of the busbars, as set out in **Table 3-1 of ES Volume 1, Chapter 3: The Scheme [APP-055]**.

Reference	Theme	Comments/Issues Raised	Applicant's Response
		sized battery units, with associated noise impact from the cooling fans, and the latter will include a 50ft high pylon. The effect of LDS on Bradfield Manor (and other listed buildings, landscapes etc) should be a major part of the Inquiry.	
MNH-002	Cultural Heritage	IN THE MATTER OF THE PLANNING ACT 2008 PINS Ref: EN010168 Application by Lime Down Solar Park Limited for an Order granting Development Consent for the 'Lime Down Solar Project' RELEVANT REPRESENTATIONS of NEIL HAMILTON, (Redacted) HERITAGE - ESPECIALLY, GRADE I LISTED BRADFIELD MANOR (Redacted) It is a medieval Gothic building dating back to the 14th century. From Domesday, until it was sold in 1992 by Mr John Branston, the manor was the centre of an agricultural unit, stretching northwards to the ancient woodland, Bradfield Wood. Mr Branston has put 180 acres of farm-land immediately surrounding Bradfield Manor into the Lime Down Solar (LDS) industrial complex. Lime Down is an invented name designed to sound 'cuddly' and it is the polar opposite of a 'park,' as it is misleadingly described.	**ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, supported by **Appendix 12.1: Heritage Statement [APP-219],** identified that there was a potential for a moderate / minor adverse effect on Bradfield Manor Farmhouse, which is not significant (less than substantial harm at the lower end in NPPF terms). Site visits were undertaken with Historic England on the 28th March 2025, which included visiting land adjacent to Grade I Listed Bradfield Manor Farmhouse and Rodbourne Conservation Area. A second site visit with Historic England was undertaken in the grounds of Bradfield Manor Farmhouse on the 22nd May 2025 (see table 12-2 in **Chapter 12: Cultural Heritage [APP-064]**). Feedback provided during the site visits was used to inform the Scheme design and assessment provided in **Chapter 12: Cultural Heritage [APP-064].** As stated in **Appendix 12.1: Heritage Statement [APP-219]** when considering the contribution of setting to the significance of the Grade I Listed Bradfield Manor Farmhouse (NHLE: 1198808), the asset is largely defined and experienced from within the Bradfield Manor Farmhouse grounds, in particular the walled courtyard to the south-west of the asset, where the full architectural interest of its south-facing primary elevation can be appreciated. Lime Down D is located within agricultural land to the north of asset. Following advice provided by Historic England panels in Field D5 were set back away from Grade I

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		This 180 acres extends in an arc around Bradfield Manor from NE to SW, obliterating the landscape and filling virtually all the space between Bradfield Manor and Bradfield Wood. If LDS were built, it would completely wreck the setting of this Grade I listed building. Grade I listed buildings are exceptionally rare; there are only 9380 in the whole of England, 295 of which are in Wiltshire. They constitute less than 2.5% of all listed buildings. Most Grade I listings are for major national landmarks like Buckingham Palace, Westminster Abbey or, in Wiltshire, Salisbury Cathedral, Malmesbury Abbey and major stately homes like Longleat, Wilton House and Lacock Abbey. There are very few Grade I listed smaller residential dwellings like Bradfield Manor, which is a rare surviving medieval hall house. It is, therefore, a building of exceptional historic and architectural interest even within the category of Grade I buildings. The setting of which, and the views from its rooms above the ground floor, will be completely ruined by the proposed footprint of LD. LDS is a 'nationally significant infrastructure project'. But Grade I listed buildings are also 'nationally significant' and great weight should	Listed Bradfield Manor Farmhouse and enhanced screening is proposed along existing hedgerows. Views of the proposed BESS and 400 kV Substation from Bradfield Manor Farmhouse will be largely mitigated by the proposed new woodland belt along the south-eastern boundary of Field D3 which, in combination with the existing woodland block west of D1 and south of D22, provides extensive screening in views to and from Bradfield Manor Farmhouse. It was identified that there would be a moderate / minor (not significant) adverse effect to the asset (less than substantial harm at the lower end in NPPF terms) as a result of indirect (i.e. setting) impacts. The Applicant wishes to clarify that there are no 50ft high pylons proposed in the application. The maximum possible envelope of the busbars associated with the 400kv substation have been assessed using clearly defined design parameters, up to a maximum height of 13 metres to the top of the busbars, as set out in **Table 3-1 of ES Volume 1, Chapter 3: The Scheme [APP-055]**.

Reference	Theme	Comments/Issues Raised	Applicant's Response
		be given to preserving and protecting them from the kind of vandalism proposed here. In addition to the acres of solar panels, LDS has (Redacted) us with proposals for the BESS and a 400 kV transmission station. The former will include up to 200 shipping-container sized battery units, with associated noise impact from the cooling fans, and the latter will include a 50ft high pylon. The effect of LDS on Bradfield Manor (and other listed buildings, landscapes etc) should be a major part of the Inquiry.	
MNH-003	Landscape and Visual Site selection and Alternatives Climate Change and Energy Need	2. DISPROPORTIONATE QUANTITIES OF LAND REQUIRED TO GENERATE A GIVEN AMOUNT OF ELECTRICITY BY SOLAR I accept that Government policy is to achieve 'net zero' by 2050; a timescale which is physically impossible to achieve, considering that only 20% of CO2 emissions derive from power generation. However, there is still a balancing exercise to be carried out by PINS. Were it not so, there would be no point in an Inquiry. It is legitimate for PINS to consider in this balancing exercise, the disproportionately small actual output of solar power from the proposed panels and the disproportionate	The **Statement of Need [APP-266]** describes that there is an urgent and unprecedented need for new low carbon generation in the UK to meet our climate change, energy security and affordability targets. Further, the Government considers that a secure, reliable, affordable, net zero consistent system in 2050 is likely to be composed predominantly of wind and solar (NPS EN-1, Para 3.3.20). Further, Section 2.9 of the **Statement of Need [APP-266]** describes that the government is seeking a large capacity of new low carbon schemes to come forwards to prioritise projects needed for 2030, while maintaining a robust pipeline of projects beyond 2030 towards meeting net zero by 2050. Figures 28 and 29 of the Statement of Need and related text (Section 8.5) demonstrate that a multi-technology approach to electricity supply, including solar, can reduce the effects of weather variability on output and is capable of closely matching a future projection of national electricity demand on a month-average level.

Reference	Theme	Comments/Issues Raised	Applicant's Response
		substantial damage caused to other legitimate interests (like Grade I listed buildings and the landscape) by the monumental scale of the scheme. The public presentations of LDS have been deliberately misleading. According to the developer, 'the project is designed to deliver approximately 500 megawatts (MW) of renewable electricity, which is enough to power roughly 115,000 homes annually.' This disguises the reality that, in the winter, very little solar generation is possible because none can be generated in the dark or with low light levels during the day. On the 8 January as I write this, solar power generated 0.00% of its theoretical capacity during the early hours (GMT), as it was nighttime. The UK's total solar capacity reached 21.50 GW by this date, but its annual average capacity factor remains approximately 10% due to the northern climate. So, to reach LDS's claimed output figures, vast quantities of land are required compared with other forms of power generation (including other renewables). In my submission, in the balancing of interests by PINS, this should weigh in favour of the objections and against the scheme.	Section 9.4 of the **Planning Statement [APP-267]** sets out the planning balance, considering the positive, neutral and negative impacts of the Scheme. Taking these into account and having regard to all important and relevant matters, it is concluded that there are no adverse impacts of sufficient weight, either on their own or collectively, that would mean the DCO should not be made. The adverse impacts identified are clearly outweighed by the substantial public benefits that would arise from the provision of low carbon energy to meet the need identified in NPS EN-1. The Applicant also notes the comment regarding output figures and land requirements. **Section 6.7.6 and 6.7.7 of The Statement of Need [APP-266]** set out that large-scale solar schemes are efficient in comparison to other technologies in terms of the energy they generate over their lifetime on a per unit area basis. Furthermore, solar technology can also generate more energy per hectare of land than other existing low carbon electricity generation technologies. For example, solar can generate between 25 and 50 times the energy output per unit area of growing crops for energy. By following good design principles, solar schemes can generate a similar amount of energy per hectare of land as onshore wind. provides a comparative analysis of energy generation per unit of land, demonstrating that large-scale ground-mounted solar schemes are highly efficient. **Section 6.7.1 of the Statement of Need [APP-266]** also sets out that NPS EN-3 indicates that along with associated infrastructure, a solar farm typically requires between 2 to 4 acres for each MW output. Different configurations have different performance characteristics in terms of acres/MW(p). The illustrative design for the Scheme lies within that range. However, while MW(p) is an important measure in relation to the maximum power which can be generated from a scheme, it is not the only metric by which the decarbonisation and energy

Reference	Theme	Comments/Issues Raised	Applicant's Response
			security benefits brought forwards by solar schemes can or should be measured.
MNH-004	Description and DCO Process Site selection and Alternatives	3. STRATEGIC PLANNING Given the scale of solar NSIPs, they should be as compact as possible and near to a grid connection. I believe that the dispersed footprint of LDS and its 20km distance from the grid connection at Melksham make this project unprecedented in its unsuitability. It seems that the disparate sites (each of which qualifies as an NSIP in its own right), have been stitched together without any strategic planning and derive solely from a random collection of landowners prepared to sign option agreements to line their own pockets at the expense of their neighbours. This kind of development occurred in the 1930s as 'ribbon development' and led to the Town & Country Planning Act 1947, introduced to replace random despoliation of the countryside with strategic planning, including the introduction of green belts and other public goods. As a matter of general policy, given the rash of solar NSIP proposals currently being promoted, PINS should promote compaction in site design and proximity to a grid	The Applicant's approach to site selection is set out in detail in **ES Volume 3, Appendix 4-1: Site Selection Assessment Report (The SSAR) [APP-185]**. This includes how the Applicant has sought to prefer contiguous land parcels or land parcels close to one another when selecting the Solar PV Sites. The **SSAR [APP-185]** also explains how sites closer to the point of connection were initially considered, before the search area was expanded on the basis that no suitable sites closer to the point of connection were identified.

Reference	Theme	Comments/Issues Raised	Applicant's Response
		connection as a desirable feature for recommending consent. A project design like LDS, 2 miles long and 4 miles wide, with 5 random parcels of land, connected by cable and connected to the grid by a cable requiring 15 miles of trench over land which will be acquired by CPOs, or the threat of CPOs, is flawed in principle. PINS should make recommendations which are consistent with best practice planning principles and not those which fly in their face.	
MNH-005	Landscape and Visual	LANDSCAPE The monumental scale of the proposed solar panels is unprecedented. Disgracefully, LDS has not yet announced definitively the exact specification of the panels which will be used but we know that they will be up to 4.5m (15ft) high and there are likely to be at least 650,000 of them. LDS say that they will be well-screened but this is impossible given the undulating nature of the landscape and the fact that the 4.5m panels are the height of a double-decker bus. Proper screening will take a generation to grow naturally but, even then, the nature of the landscape will have changed, eliminating the current vistas from, for example, Bradfield Manor, where the imposition of 180 acres of giant solar panels will completely wreck its	The height of the solar PV panels has been assessed using clearly defined design parameters, including a maximum height of 4.5 metres above ground level at maximum tilt, as set out in **ES Volume 1, Chapter 3: The Scheme [APP-055]**. These parameters represent a realistic worst-case scenario for the purposes of the Environmental Impact Assessment. The landscape and visual effects of the Scheme, including the effects of the maximum panel height, are assessed in the Landscape and Visual Impact Assessment (LVIA) presented in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**. The LVIA assesses effects on identified landscape and visual receptors during construction, operation and decommissioning, using the maximum design parameters to ensure a robust assessment. Mitigation measures to address landscape and visual effects, including measures that reduce the perceived height and prominence of panels in views, are set out in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**, Figure 3-4-1 to 3-4-5.2 **Landscape and Ecology Mitigation Plan [APP-084]** and detailed within the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]**. These include new

Reference	Theme	Comments/Issues Raised	Applicant's Response
		setting Nine Cotswolds villages will be adversely affected by the scheme, which has been randomly developed according to which landowners have been willing to line their own pockets at the expense of their neighbours, whose homes and neighbourhoods will be severely damaged financially as well as in terms of quality of life.	and enhanced planting, retention of existing hedgerows and woodland, and landscape integration measures to reduce visual effects over time. The preparation, approval and implementation of the detailed Landscape and Ecological Management Plan, substantially in accordance with the **OLEMP [APP-283]**, are secured through Requirement 7 in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that the identified mitigation measures are delivered and maintained throughout the lifetime of the Scheme. The landscape and visual effects of the Scheme, including the effectiveness and phasing of proposed screening and planting, are assessed in the Landscape and Visual Impact Assessment (LVIA) presented in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**. The LVIA considers landscape and visual effects over time, including during the early years of the Scheme before planting is fully established, and identifies where significant effects may occur. NPS EN-1 recognises at para 5.10.5 that *"Virtually all nationally significant energy infrastructure projects will have adverse effects on the landscape, but there may also be beneficial landscape character impacts arising from mitigation.*" The full assessment of effects of the Scheme on Bradfield Manor Farmhouse (receptor No RI068) is set out ES Chapter Volume 3, Appendix 8-3-2-2: Landscape and Visual Assessment Sheets (Significant) (APP-191). The assessment finds that there would be Moderate (Significant) effects during Construction and Year 1 and effects would reduce to Moderate/ Minor (non-significant by Year 15 and No effect following Decommissioning. Mitigation measures are detailed in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**, Figure 3-4-1 to 3-4-5.2 **Landscape and Ecology Mitigation Plan [APP-084]** and the **Outline Landscape and Ecological Management Plan**

Reference	Theme	Comments/Issues Raised	Applicant's Response
			(OLEMP) [APP-283]. Proposed planting comprises a mix of native species designed to enhance biodiversity and resilience, with planting design prioritising long-term effectiveness and landscape integration. The **OLEMP [APP-283]** sets out the approach to establishment, maintenance and management of planting to ensure its effectiveness over the lifetime of the Scheme. The LVIA includes verified viewpoints with both summer and winter photography to demonstrate year-round changes to the landscape. Photomontages at Year 15 illustrate the effectiveness of established planting, while also demonstrating the intended retention of openness across the receiving landscape. It is recognised that from upper floors of this property, there would be filtered views of construction of proposed solar array within southern fields of Lime Down D, (D5, D3, D2 and D1) and that views would be filtered through existing hedgerow vegetation located between the Scheme and the dwelling. There would be glimpsed filtered views of construction of the BESS within D1. Views of the 400kv substation would be screened by the existing woodland to the west of D1 and south of D22. Vegetation within the curtilage of the property would screen ground floor and immediate garden views. The assessment also notes the proposals include for a green corridor along the southern boundary of D3 and hedgerow reinforcement along the boundaries of D1, D2, D3, D5 and the wider Site. And that although the effect of this would be limited initially, by Year 15 mitigation planting would screen views of proposed infrastructure in southern fields of Lime Down D and would integrate with the existing vegetated field margins. The preparation, approval and implementation of the detailed Landscape and Ecological Management Plan, substantially in accordance with the **OLEMP [APP-283]**, are secured through Requirement 7 in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that mitigation planting

Reference	Theme	Comments/Issues Raised	Applicant's Response
			and screening measures are delivered and maintained throughout the lifetime of the Scheme.
MNH-006	Climate Change and Energy Need Construction and Decommissioning	CARBON FOOTPRINT The dispersed nature of the site design, referred to in point 3 above, also has implications for LDS's carbon footprint, which should be exhaustively examined in every particular. The sole justification of the scheme is its alleged contribution to achieving net zero objectives. It has no commercial justification without enormous subsidies from taxpayers and consumers, largely extracted via consumers' bills, which recoup the extra costs imposed through renewables obligations, carbon taxes and manipulated contracts for differences to favour intermittent suppliers. In order to balance the competing policy objectives inherent in such large projects, the public needs to have a transparent and reliable evaluation of their individual carbon footprint. As of early 2026, it is estimated that 68% of solar panels imported by the UK come directly from China. This represents an increase from 61% in 2023. The reliance on Chinese production is even more pronounced when examining the underlying	The **ES Volume 1, Chapter 7: Climate Change [APP-059]** assessment has used a reasonable conservative assumption that materials will be sourced from China for the purposes of estimating GHG emissions. This does not obligate the developer to use materials from any particular supplier or country of origin but represents a reasonable assessment scenario given that China are the largest manufacturer of solar panels. The equipment proposed for Lime Down Solar Park will be sourced from established and responsible supply chains. Island Green Power is part of the Solar Energy UK Supply Chain Commitment, which binds the Applicant to ensuring that our supply chains are free of slavery. As part of this, the solar sector in the UK and Europe has launched the Solar Stewardship Initiative, which independently inspects and certifies individual factories for sustainable and ethical practices. **ES Volume 1, Chapter 7: Climate Change [APP-059]** demonstrates that there is an overall net saving as a result of the scheme on GHG emissions compared to a without scheme scenario. Regarding commercial justification, the Scheme is entirely funded by the Applicant, and not via subsidies. As set out in Section 2,3 of the **Funding Statement [APP-019]**, the Applicant has the ability to procure the financial resources necessary to fund the works to be authorised by the DCO. The Applicant's **Statement of Need [APP-266]** provides evidence that an unprecedented capacity of new low-carbon generation schemes is urgently needed for the UK to meet its legally binding climate change targets. The government has confirmed that solar energy is at the heart of the Clean Power 2030 Mission [NPS EN-3 (2025) Paras 2.10.1 & 2.10.2]. The

Reference	Theme	Comments/Issues Raised	Applicant's Response
		components and materials rather than just final assembly: Polysilicon Sourcing: An investigation found that 97% of solar panels installed in the UK contain polysilicon sourced from China. Regional Concentration: Roughly 40% of the materials used in UK solar panels are estimated to originate from a single region,(Redacted), which has faced international scrutiny regarding ethical sourcing and forced labour. This is relevant because of the obligations imposed by the UK's Modern Slavery Act. Market Components: Chinese firms also account for approximately 60% of the market for power inverters (the devices that convert solar energy into usable electricity) in the UK. Much of the reduction in the UK's CO2 emissions has resulted from the collapse of energy-intensive heavy industry, caused by the UK having the highest industrial energy prices in the world (4 times the USA's and twice those in France). A major factor in this is the inherent need to double generating capacity to cope with the intermittency of renewables. This de-industrialisation of the UK has contributed almost nothing to reducing global emissions. It has merely shifted the accounting for CO2 emissions from the UK's carbon	Statement of Need confirms that the need for the Scheme is urgent and that substantial weight should be given to the need for the Scheme [NPS EN-1 (2023) Para 3.2.9-3.2.10]. The Applicant is confident that the proposed management and mitigation measures set out in the **Environmental Statement [APP-052 to APP-265]** are comprehensive and robust and that the Scheme aligns with national and local planning policy; this is outlined in the **Planning Statement [APP-267]**. Of particular relevance are Annex A: National Policy Statement Accordance Tables and Annex B: Local Policy Accordance Tables, of the Planning Statement which set out an appraisal of the Scheme against national and local planning policies.

Reference	Theme	Comments/Issues Raised	Applicant's Response
		balance sheet to China, India etc. and other countries whose commitment to emissions reductions is merely performative and whose top priority is economic growth. China produces over 30% of global CO2 emissions; the UK, less than 1%. Yet China is still massively expanding coal-fired generative capacity. The Finland-based Centre for Research on Energy and Clean Air (CREA) and Global Energy Monitor (GEM) in the United States, reported that China began construction on 94.5 GW of coal power projects in 2024; 93% of the global total. For Lime Down Solar to be justified, it must make a real, not an illusory, contribution to reducing the UK's CO2 emissions. This requires a full audit of the CO2 emissions created during the construction and transport of solar panels, the construction of the site infrastructure, the mining of the chemicals used in the manufacture of the panels, mostly deriving from countries with very poor environmental records etc. Without reliable information on the true carbon cost of LDS, all its claims of producing 'green' energy are meaningless. One of Wiltshire Council's primary technical objections is that construction emissions would delay	

Reference	Theme	Comments/Issues Raised	Applicant's Response
		the project's 'carbon break-even' point until 2076, meaning it would take approximately 50 years to offset the carbon footprint of its building phase. Clearly, if there is only a minimal real reduction in CO2 emissions over the 60-year maximum lifetime of the scheme, the harms caused to other desirable policy objectives e.g. heritage and landscape protection, food security, etc, need to be given far greater weight in the balancing exercise of the decision-making process. This aspect needs to be exhaustively examined with expert evidence.	
MNH-007	Noise and Vibration Other Environmental Matters	6. NOISE North Wiltshire is still very rural and relatively tranquil. Traffic noise is minimal for most residents, apart from agricultural activity at certain times of year. Bradfield Manor is affected by the main rail link from Paddington to South Wales but the few trains per hour flash past in about 25 seconds so the impact is negligible. By contrast, the noise of LDS BESS cooling systems will be audible 24 hours a day for up to 60 years. Furthermore, extreme noise disruption will be caused during the lengthy construction period, with hundreds of huge lorries carrying	An **Outline Construction Traffic Management Plan (Outline CTMP) [APP-287]** supports the DCO Application and includes outline measures to minimise transport and access impacts as far as practicable. This includes road condition surveys to ensure any damage to the highway network caused by construction traffic is identified and rectified, management of construction deliveries to avoid the requirement for HGVs generated by the Scheme passing each other in opposite directions on the local roads, and restricted hours of deliveries outside of peak hours. A final CTMP would be prepared post consent and must be substantially in accordance with the **Outline CTMP [APP-287]** and approved by the relevant local planning authorities. The noise and vibration impacts arising from construction activities are assessed in Section 14.10 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**. Mitigation measures are committed to through the **Outline Construction**

Reference	Theme	Comments/Issues Raised	Applicant's Response
		heavy loads on roads unsuited to such traffic. Perhaps worse still, will be the intolerable noise nuisance caused by the scheme's colossal piling requirements for securing in the ground its 650,000 panels. This promises to make our lives at (Redacted)(and others affected elsewhere) a living hell. Noise can travel long distances depending on atmospheric conditions. For example, on certain days noise from the M4 and the motor racing track at Castle Combe can clearly be heard from Bradfield Manor, which is up to 4 miles distant. The constant hum of inverters and the sound of cooling fans for the BESS will originate only a few hundred metres from Bradfield Manor and are bound to affect it adversely. All this needs to be exhaustively examined during the Inquiry.	**Environmental Management Plan (Outline CEMP) [APP-277]**. The preparation, approval and implementation of the Construction Environmental Management Plan, substantially in accordance with the **Outline CEMP [APP-277]**, is secured through Requirement 13 in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that construction noise and vibration are appropriately controlled. With these measures in place, the assessment concludes that no significant effects from construction noise or vibration are expected. The Applicant also notes that noise from the installation of solar PV panels will be spread across the site over the course of the construction period and therefore will only be at the predicted levels presented in Table 14-18 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]** for relevant sensitive receptors when works are occurring at the relevant associated site. As a reasonable worst-case this assessment includes the noise from piling rigs that are larger and louder than those used in practice. The assessment also includes the noise from construction traffic. A noise monitoring programme agreed with Wiltshire Council will be carried out during construction. The noise impacts from the operation of the Scheme and its components are assessed in Section 14.10 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**. As shown in Table 8 of **ES Volume 3, Appendix 14-4: Noise Modelling [APP-237]**, levels would typically be below or slightly above the existing background sound in the area. The levels have been calculated, using the appropriate international standard, on a worst-case assumption that wind is blowing from the source of the noise to the receptor locations, as stated in paragraph 14.4.15 of **ES Volume 1, Chapter 14: Noise and Vibration**

Reference	Theme	Comments/Issues Raised	Applicant's Response
			[APP-066]. Due to its length, noise from the M4 will travel further than noise from static plant within the Scheme. The **Outline Operational Environmental Management Plan [APP-278]** commits to noise levels from the Scheme at residential dwellings being the same as or below those modelled in the ES. This provides assurance that, while operational noise will occasionally be audible, it will be close to the existing background sound level at Bradfield Manor Farmhouse. The preparation, approval and implementation of the detailed OEMP, substantially in accordance with the outline plan, is secured through Requirement 14 of Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring operational noise is appropriately controlled throughout the lifetime of the Scheme.
MNH-008	Site selection and Alternatives Construction and Decommissioning	7.CABLING This is one of the most bizarre features of LDS's scheme. 400kV of electricity will need to be transmitted by underground cable buried in a wide trench, filled with insulation and heat-dispersing stones, for a distance of 15 miles. The Cable Route Corridor has a footprint of 50 metres along most of its length in order to accommodate construction activities, increasing to 665 metres in specific locations. This is an unprecedented feature not found in any other UK NSIP. In addition, the cabling will have to go: (a) under the main railway line from Paddington to South Wales, (b) under the M4 and (c) under the main railway line from	The Applicant's approach to site selection is set out in further detail in **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]** (The SSAR). The SSAR explains how sites closer to the point of connection were initially considered, before the search area was expanded on the basis no suitable sites closer to the point of connection were identified. The Applicant has followed National Fire Chiefs Council (NFCC) guidance and commissioned a Plume Assessment Study to model toxic gas emissions and visibility impacts from a BESS fire on all sensitive receptors within a 1km radius of the BESS area. The fire emissions modelled in the report were based upon recent UK Health Security Agency (UKHSA) requests for DCO BESS projects which explore both immediate air quality impacts together with annual UK air quality requirements. The UKHSA is a statutory consultee for the Scheme and has confirmed that they are satisfied with the Applicant's submitted documentation and Plume Assessment Study methodology and results.

Reference	Theme	Comments/Issues Raised	Applicant's Response
		Paddington to Bath and Bristol. The BESS is also proposed to be sited immediately adjacent to the London-South Wales railway, where the line is in a 10 metres deep cutting, which has implications for dispersal of the vast quantities of water which would be used in response to thermal runaway and also act as a sink for heavier-than-air gases which would be released. The BESS does not have to be near the panels; it could be anywhere accessible to the cable route. (LDS rejected a site adjacent to the grid connection at Whitley in favour of the current proposed site). A more suitable BESS site needs to be found, not least because of the possibility of thermal runaway disrupting transport links and the impossibility of extinguishing such chemical reactions, not to mention the colossal quantities of water needed to cool the batteries if such a disaster occurred. There is no natural water anywhere near the proposed site. It would need to be brought in by tanker and stored in a reservoir. There is also nowhere for water to go naturally if it had to be used - except possibly into the railway cutting, which is 10 metres deep at this point. There are clear public safety issues which need to be exhaustively examined, as illustrated by the thermal runaway at Moss Landing in	Six worst case BESS fire locations (i.e. locations within the BESS Area closest to sensitive receptors) have been modelled as depicted in **ES Volume 2, Figure 15-5: Battery Energy Storage System Fire Emissions Study Area [APP-166]**. The concentrations of carbon monoxide (CO), formaldehyde, hydrogen chloride (HCl), hydrogen cyanide (HCN), hydrogen fluoride (HF), ammonia (NH_3), nitrogen dioxide (NO2) and particulates from a potential BESS fire have been modelled using an air quality dispersion model to determine the likely effects on human health. A high-level visibility assessment has also been undertaken using the modelled particulates results to determine the effect of BESS fire emissions on visibility on the local road and rail network to inform the **Outline Battery Safety Management Plan (OBSMP) [APP-286].** The Plume Assessment Study has concluded that there are no significant toxic emission or visibility impacts at all sensitive receptor locations. The Applicant has also committed to commissioning an additional Plume Analysis Study at the detailed design stage as stipulated in Section 5.5.9 of the OBSMP and secured through the DCO: "*..at the detailed design stage a BESS system and site specific Plume Analysis study will be conducted to assess the environmental impact of a site incident to sensitive receptors within a 1 km radius. Toxic gas emissions to sensitive receptors must be below relevant public health exposure limit guidelines when the battery system of a BESS is fully consumed (burnt out), production of Particulate Matter (PM) and a visibility impact assessment on any transport links within a 1 km radius of the BESS area will also be included. The ERP produced at the detailed design stage (template outlined in Section 5.4.9 -5.4.11) will incorporate all necessary emergency response procedures and actions based upon thermal runaway test data supplied by the BESS system provider.*"

Reference	Theme	Comments/Issues Raised	Applicant's Response
		California a year ago. There can be no justification for taking ANY risks with the siting of the BESS, given the CPO powers which a DCO grants. It should be sited near the grid connection, with good access for fire services, sufficient water supply and infrastructure to carry it away without creating unacceptable flooding risks.	As now mandated under NFPA 855 (2026) the Applicant will only be able to select a BESS system that has undertaken Large Scale Fire Testing (LSFT). At the detailed design stage, the selected BESS LSFT data will be leveraged to fully inform inputs for risk assessment tools which will be utilised together with detailed consequence modelling to provide a comprehensive site operations and emergency response safety audit, this is stipulated in the OBSMP pre-construction requirements (Section 6). An **OBSMP [APP-286]** has been prepared for the Scheme using guidance from Dorset and Wiltshire Fire and Rescue Service and incorporating recommendations of the National Fire Chiefs Council. The safety objectives for the design of the BESS site are listed in Section 2.4 of the OBSMP. The OBSMP will be amended at Deadline 1 to fully accommodate the latest BESS safety requirements contained in NFPA 855 (2026) ensuring that any credible risks associated with battery storage are either prevented or fully mitigated if a BESS failure occurs. Section 2.4.2 of the OBSMP stipulates that: *"Final BESS design and site layout will have been validated through mandatory Large Scale Fire Testing (LSFT) and rigorous consequence modelling to minimise the requirement for any D&WFRS intervention in a thermal runaway incident. LSFT must establish minimum equipment spacing distances that demonstrate there is no fire propagation to adjacent BESS enclosures or ESS equipment. D&WFRS intervention in worst case scenarios would typically be limited to boundary cooling of adjacent BESS and Energy Storage System (ESS) units to prevent the fire from spreading. This strategy will be finalised*

Reference	Theme	Comments/Issues Raised	Applicant's Response
			with D&WFRS and be clearly communicated in the Emergency Response Plan (ERP); *• To ensure that fire, smoke, and any release of toxic gases does not significantly impact site operatives, first responders, and the local community; and* *• To ensure that firewater run-off is contained and tested before release or, if necessary, removed by tanker and treated offsite."* As set out in the **OBSMP [APP-286]**, the BESS Area will have a robust and validated Emergency Response Plan (ERP), developed in consultation with Dorset & Wiltshire Fire and Rescue Service at the detailed design stage. Section 5.4 of the OBSMP specifies the typical emergency response protocols, procedures and safety information that will be included in ERPs. ERPs will be drafted and approved for all stages of the Scheme, including construction, operation, and decommissioning. The Applicant's ERP template includes all requirements specified in both NFCC and NFPA 855 guidance and recommendations. Section 5.4.9 – 5.4.11 of the OBSMP stipulates that the ERP will follow NFCC and NFPA 855 (2026) guidelines and stipulates the minimum content that an ERP must contain, including: *"Emergency procedures for all credible hazards and risks, including building, infrastructure and vehicle fire, wildfires, impacts on local respondents, impacts on transport infrastructure."*

Reference	Theme	Comments/Issues Raised	Applicant's Response
			All risk assessments to be conducted at detailed design for BESS projects required by the Health and Safety Executive (HSE) to assess fire and explosion risk are stipulated in Section 6.1.5. Further explosion prevention, mitigation, and safety requirements for the Scheme are stipulated in the OBSMP Sections: 1.1.6 – 1.1.7, 4.1.3 – 4.1.10, 4.1.18, 4.1.27, 4.1.30 - 4.1.33, 4.1.36 – 4.1.39, 5.1.3, and 5.1.6. Section 5 of the OBSMP covers all requisite firefighting requirements for the Scheme including fire service access, firefighting water supply, and emergency planning requirements. The Applicant is in the process of agreeing a Statement of Common Ground (SOCG) with D&WFRS to provide assurance that all safety and emergency response requirements are fulfilled. The Applicant is currently drafting a Statement of Common Ground (SOCG) with the Environment Agency (EA) on Scheme environmental protection issues including the BESS area drainage strategy. The agreed strategy document will be appended to the OBSMP at Deadline 1, to provide further assurance that all water pollution risks from a BESS fire are fully mitigated. The EA is a statutory consultee for the OBSMP and drainage strategies and must approve the final BSMP and drainage design at detailed design before construction of the BESS commences. The **OBSMP [APP-286]** is secured through Requirement 6 (Battery safety management) in Schedule 2 of the **Draft DCO**

Reference	Theme	Comments/Issues Raised	Applicant's Response
			[APP-016], which provides that Work No. 2 must not commence until a Battery Safety Management Plan has been submitted to and approved by the relevant planning authority. The approved plan must be substantially in accordance with the Outline Battery Safety Management Plan. The Draft DCO also requires the relevant planning authority to consult with Dorset and Wiltshire Fire and Rescue Service and the Environment Agency before determining the application, and that the Battery Safety Management Plan must be implemented as approved.
MNH-009	Hydrology, Flood Risk and Drainage	8. FLOODING The lane between Bradfield Manor and the adjacent fields selected for solar panels floods badly every year. Similar problems occur elsewhere in the dispersed LDS site. Malmesbury, in particular, regularly experiences severe flooding. The river catchment system is barely capable of accommodating flash floods now, let alone the exacerbated water flows which the inherent nature of massive impermeable ceramic panels will cause, as a result of water concentration at the point of run-off and soil compaction. No strategic approach to solar NSIPs would reasonably countenance the configuration of the LDS scheme, quite apart from its distance from the grid connection. Given the constricted nature of the streams which connect to the River Avon, severe flooding seems likely to be exacerbated without any substantial alleviation	The Applicant acknowledges that local flooding affects lanes and settlements in the area, including Malmesbury, and that this is a matter of concern to local people. The potential effects of the Scheme on hydrology and flood risk have been assessed in **Environmental Statement Volume 1, Chapter 11 Hydrology, Flood Risk and Drainage [APP-063]**, supported by the **Flood Risk Assessment and Drainage Strategy [APP-210 to APP-218]**. These assessments consider all relevant sources of flood risk and construction phase mechanisms and conclude that the Scheme would not increase flood risk elsewhere or give rise to significant adverse effects on flood risk receptors. The Applicant does not agree that solar PV arrays are "massive impermeable" surfaces that inherently exacerbate runoff. National policy recognises that ground mounted solar PV generally drains to ground and does not create significant drainage impacts where ground cover is maintained (**NPS EN-3 paragraph 3.10.75**). The design approach distinguishes between panelled areas and hardstanding associated with supporting electrical infrastructure. Panelled areas allow rainfall to drain to the existing ground surface, while engineered and controlled drainage is provided where infrastructure such as access tracks, substations or the BESS introduces impermeable surfaces. These drainage controls are secured through the **Flood Risk Assessment and Drainage Strategy [APP-210 to APP-218]** and the **Draft Development Consent Order [APP-016]** discharge process.

Reference	Theme	Comments/Issues Raised	Applicant's Response
		being possible through an engineering solution. This also needs to be exhaustively examined.	
MNH-010	Transport and Access	9. TRAFFIC Traffic on our country lanes has increased significantly in the last 20 years since we moved to the area. I used to be a keen runner but was forced to give up running on the lanes for reasons of safety. The verges are unsuitable as refuges and the narrowness of the lanes conspires with the volume of traffic to make the experience now both unpleasant and risky. In the narrowest parts of the lanes the verges are regularly damaged by vehicles trying to pass each other, producing ruts and potholes. With increased water flows from the fields covered with thousands of solar panels, this problem can only get worse. Little alleviation is possible without changing the character of the country lanes through widening, straightening and replacing our rural country character by a soul-less urbanised wilderness.	The assessment presented in Annex H of **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]** demonstrates adequate carriageway width or frequency of passing place opportunity to pass at least an HGV and a light vehicle as requested in comments provided by Wiltshire Council in its response (August 2025) to the Transport Assessment Scoping Note and confirmed in Paragraph 4 of 'Appendix A - Highways and Transport Document Review - Detailed Comments'. This confirms that no passing bay or widening improvements are needed to accommodate these movements on the construction route outside of the Order Limits. The distances between passing points outside of the Order Limits are all within 150 m with forward visibility extending to the next passing point and beyond. This is within the generally accepted distance of 200 metres. In relation to the concern that solar panels would increase runoff affecting local lanes and verges, the assessment presented in **Environmental Statement Volume 1, Chapter 11 Hydrology, Flood Risk and Drainage [APP-063]** concludes that the Scheme would not increase surface water runoff rates or volumes leaving the Site. Solar PV panels drain to the existing ground surface and maintain infiltration and overland flow processes, and therefore would not be expected to increase water flows affecting surrounding roads or drainage pathways. As set out in the **OCTMP [APP-287]**, a booking system will be set up to manage arrivals and departures to the Order Limits. This will be implemented in coordination with banksmen, which will be able to hold back any cross-over, should there be any

Reference	Theme	Comments/Issues Raised	Applicant's Response
			delays on the roads. This will prevent HGVs generated by the Scheme passing each other in opposite directions on the local roads forming part of the construction routes and will be confirmed as part of the final CTMP. In response to paragraph 14.7, excessive widening of existing rural routes to allow two HGVs to pass would be over engineering, because of the following reasons: • temporary nature of the construction period; • trip generation of 76 HGVs on the route to Lime Down D is an estimate of the deliveries on a peak day, so does not represent a daily average; • trip generation of 76 HGVs on the route to Lime Down D is based on the worst-case assumptions, including but not limited to, all phases and Solar PV Sites being constructed simultaneously and a 50% uplift; • average number of HGV construction movements along the route to Lime Down D is only 50 per day/7 per hour/one every 8 minutes (less than the journey time along the route); - assuming a realistic construction programme, the average number of HGV construction movements along the route to Lime Down D is only 32 per day/5 per hour/one every 13 minutes (less than the journey time along the route); • delivery times during the construction phase are limited to those times set out in the **OCTMP [APP-287]**. There will be no HGV construction trips outside of these hours;

Reference	Theme	Comments/Issues Raised	Applicant's Response
			• there would be a much greater impact on hedgerow, trees and character; and • low level of existing HGVs on the route to Lime Down D (average number of existing HGV movements is only 46 per day, with some of these movements occurring outside of proposed construction hours set out in the **OCTMP [APP-287]**) Further detail of trip generation has also been added to **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]** which will be submitted at Deadline 1 of Examination. To provide further comfort, additional information has been added to **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]** which will be submitted at Deadline 1 of Examination. This demonstrates that there is adequate carriageway width and/or passing place opportunity for two HGVs.
MNH-011	Description and DCO Process Cultural Heritage	10. ENVIRONMENTAL STATEMENT NATIONAL POLICY STATEMENT FOR ENERGY NATIONAL PLANNING POLICY FRAMEWORK The Environmental Statement (ES) plays down the potential for 'Likely Significant Impacts' and does not allow a reasonable determination of the planning balance in accordance with National Policy Statement for Energy (EN-1) and the National Planning Policy Framework. The reasons for this conclusion can be summarised as follows: The ES concludes the impact of	The potential effects of the Scheme on cultural heritage assets, including cumulative effects, are assessed in **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, supported by **ES Volume 3, Appendix 12-1: Heritage Statement [APP-219]**. The assessment identifies heritage assets, considers their significance and the contribution of setting, and evaluates effects during construction, operation and decommissioning phases of the Scheme. The cumulative impacts have been assessed with consideration to the Scheme and other proposed and identified developments are assessed in Section 12.12 of **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**. This approach is in line with the methodology detailed in Section 6.8 of **ES Volume 1, Chapter 6: Environmental Impact Assessment Methodology [APP-058]**, consultation undertaken with Wilshire Council (see Section 12.2 of **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, as well as guidance and

Reference	Theme	Comments/Issues Raised	Applicant's Response
		development would give rise to 'less than substantial harm' to cultural heritage assets based on an assessment of each asset in isolation. Lime Down affects a substantial number of assets and their settings, including Grade I assets like Bradfield Manor whose setting is substantially impacted by the proposed BESS and associated security infrastructure. Furthermore, the ES does not assess the cumulative impact the proposals have across the quantum of heritage assets, which collectively results in substantial harm. The cumulative impact across such a wide range of heritage assets that make up the historic character of this part of Wiltshire, and the magnitude of the collective impacts, is significant and should be considered as such especially when applying Regulation 3 of The Infrastructure Planning (Decisions) Regulations 2010. The cumulative magnitude of the effects on heritage assets weighs significantly against the proposals in any balancing exercise and has been downplayed. There is also no evidence of how harm has sought to be avoided in accordance with S.66 of the Planning (Listed Buildings and Conservation Areas) Act 1990. Paragraph 5.9.28 of National Policy Statement for Energy (EN-1) also tells decision makers that substantial	policy (i.e. Paragraph 56 of Historic England Advice Note 15: Commercial Renewable Energy Development and the Historic Environment and Nationally Significant Infrastructure Projects: Advice on Cumulative Effects Assessment). The Applicant notes that regulation 3 of the Infrastructure Planning (Decisions) Regulations 2010 relevantly requires that the Secretary of State must have regard to the desirability of preserving a listed building or its setting or any features of special architectural or historic interest which it possesses when deciding an application which affects a listed building or its setting. The Applicant considers that the assessment in **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, supported by **ES Volume 3, Appendix 12-1: Heritage Statement [APP-219]** appropriately enables the Secretary of State to consider those elements in respect of the Scheme. As detailed in Section 12.3 of **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, the cultural heritage assessment has been undertaken in accordance with relevant legislation, policy and guidance, including the Planning (Listed Buildings and Conservation Areas) Act 1990 and Overarching National Policy Statement for Energy (EN-1) (January 2024). Where harm to heritage assets has been identified this has been assessed to comprise 'less than substantial harm' (see **ES Volume 3, Appendix 12-1: Heritage Statement [APP-219]**). The Applicant highlights paragraph 5.9.33 of NPS EN-1 which states that "*Where the proposed development will lead to less than substantial harm to the significance of the designated heritage asset, this harm should be weighed against the public benefits of the proposal, including, where appropriate securing its optimum viable use*." The public benefits of the scheme are detailed in **ES Volume 1, Chapter 5: Energy Need, Legislative Context and Energy Policy [APP-057]**. Paragraphs 8.2.127 to 8.3.124 of the **Planning Statement [APP-267]** provide an appraisal of the Scheme in relation to the historic environment, specifically those assets where there

Reference	Theme	Comments/Issues Raised	Applicant's Response
		harm to the setting of listed buildings, especially Grade I buildings should be wholly exceptional. This is a very high bar to pass. 5.9.29 of EN-1 also asks decision makers to refuse DCOs unless all four criteria (a-d) are met. The applicant has not responded to any of the criteria, and it stands that permission should be refused.	is less than substantial harm, as confirmed in **ES Volume 3, Appendix 12-1: Heritage Statement [APP-219]**. Paragraph 8.3.131 of the **Planning Statement [APP-267]** confirms that as there is no anticipated substantial harm to, or loss of, designated heritage assets as a result of the Scheme, the policy tests regarding substantial harm set out in NPS EN-1 paragraphs 5.9.29 to 5.9.31 do not apply. Paragraph 8.3.138 of the **Planning Statement [APP-267]** concludes that as the Scheme complies with the relevant policies in relation to historic environment and no residual significant effects are anticipated, it is considered that the historic environment should be given neutral weight in the planning balance. Section 9.4 of the **Planning Statement [APP-267]** sets out the planning balance, considering the positive, neutral and negative impacts of the Scheme. Taking these into account and having regard to all important and relevant matters, it is concluded that there are no adverse impacts of sufficient weight, either on their own or collectively, that would mean the DCO should not be made. The adverse impacts identified are clearly outweighed by the substantial public benefits that would arise from the provision of low carbon energy to meet the need identified in NPS EN-1.
MNH-012	Hydrology, Flood Risk and Drainage	Paragraph 174 of the National Planning Policy is concerned with flood risk. It explains flooding from any source, including fluvial and surface water should not be permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding. Section 5.8 of the corresponding National Policy Statement for Energy (EN-1) supports the NPPF in this regard, noting the requirement to apply the sequential test where relevant.	The Applicant confirms that the Sequential Test has been undertaken in accordance with national policy, including consideration of flood risk constraints and the ability to locate supporting infrastructure in areas at lowest flood risk. The Sequential Test and associated justification are reported in the **Planning Statement [APP-574]** and demonstrate that the Scheme has applied a sequential approach to siting, including locating critical infrastructure such as BESS and substations within Flood Zone 1. Section 8 of the **Planning Statement [APP-267]** provides an appraisal of the Scheme against planning policy. Furthermore, **Annex A: National Policy Accordance Tables** and **Annex B: Local Policy Accordance Tables of the Planning Statement [APP-267]** set out in detail how the Scheme complies with

Reference	Theme	Comments/Issues Raised	Applicant's Response
		Parts of Lime Down are within both the fluvial and surface water flood zones where there is a high likelihood of flooding. The Sequential Test was therefore applied and presented as Annex C to the Planning Statement. The Sequential Test is very limited in the number of sites and options it tests. For example, it does not consider whether within the alternative sites tested, areas liable to flood risk could be avoided as compared with Lime Down where the applicant confirms flood risk areas cannot be avoided. As such the sequential test has not been met.	national and local planning policy. This includes Paragraph 174 of the National Planning Policy Framework which is considered from pages 625 to 632 of **Annex B: Local Policy Accordance Tables of the Planning Statement [APP-267]**.
MNH-013	Ecology and Biodiversity	Section 9 of the ES addresses ecology and biodiversity. It indicates that before mitigation there is a wide range of likely significant adverse effects at a Site, Local and District level. It suggests, through additional rather than embedded mitigation, these effects can be reduced to two likely significant effects: Hedgerows - adverse significant at local level in the short term and neutral not significant in the medium to long term. Breeding birds - adverse significant at a local level (skylark), adverse significant at a site level (yellow wagtail, corn bunting, grey partridge, and quail) A landscape and ecological management plan [LEMP] is the proposed method of mitigation leading to an apparent reduction of	The flood risk and drainage assessment recognises the presence of Flood Zones within parts of the Order Limits and applies Scheme design measures and controls so the Scheme would be safe for its lifetime and would not increase flood risk elsewhere, with mitigation secured through the DCO. **ES Volume 1, Chapter 11 Hydrology, Flood Risk and Drainage [APP-063]**. No amendments to the application documents are required. The Applicant acknowledges that some adverse ecological effects are unavoidable as a result of the Scheme. These are transparently reported within **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]** and are summarised within the residual effects summary tables (Table 9-14 and 9-15). The Chapter provides a balanced assessment of likely significant effects, identifying residual effects where these remain after mitigation. Unavoidable adverse impacts, including displacement of ground-nesting birds and loss of hedgerows, have been minimised through careful design and are subsequently addressed through mitigation, compensation and long-term management to be secured via DCO Requirements including the **Outline Landscape and**

Reference	Theme	Comments/Issues Raised	Applicant's Response
		significant ecological effects down to the two listed above. However, these two significant impacts are not avoided, adequately mitigated or compensated for. This is contrary to paragraph 5.4.42 of National Policy EN-1. In accordance with paragraph 5.4.43 of EN-1, the Secretary of State shall give significant weight to residual harm and consent may be refused on this ground alone. In summary, the National Policy for Energy EN-1 is clear on matters of heritage, flood risk and ecology. In each case matters can individually represent a reason to refuse a DCO such as Lime Down. Likewise, the cumulative impact would further justify a refusal. Expanding this further, paragraph 4.1.3 of EN-1 explains 'Given the level and urgency of need for infrastructure of the types covered by the energy NPSs set out in Part 3 of this NPS, the Secretary of State will start with a presumption in favour of granting consent to applications for energy NSIPs. That presumption applies unless any more specific and relevant policies set out in the relevant NPSs clearly indicate that consent should be refused.' As demonstrated above, policies in respect of heritage, ecology and flood risk set out in NPS EN-1 confirm on	**Ecological Management Plan (Outline LEMP) [APP-283]** and the **Outline Ecological Protection and Mitigation Strategy (Outline EPMS) [APP-284].** Residual significant effects on habitats and species are clearly set out within **ES Chapter 9 [APP-061]** and are limited to short-term loss of hedgerows and displacement of ground nesting birds, which have been mitigated for as far as possible within the Scheme in the Applicant's view. **ES Chapter 9 [APP-061]** also identifies significant residual beneficial benefits during the Operation and Maintenance phase of the Scheme for a range of ecological features, including other neutral grassland, woodland, ponds, hedgerows, watercourses, badgers, bats, dormice, brown hare, harvest mouse, hedgehog, polecat, amphibians, reptiles, breeding birds, overwintering birds and terrestrial invertebrates. In accordance with Policy EN-1 the residual adverse effects of the Scheme will be balanced against the Scheme's benefits in decision making by the Secretary of State. Section 8 of the **Planning Statement [APP-267]** provides an appraisal of the Scheme against planning policy, including heritage, flood risk and ecology policies. Paragraphs 8.3.26 to 8.3.67 of the **Planning Statement [APP-267]** consider ecology, concluding that it has been demonstrated that the majority of adverse effects on biodiversity as a result of the Scheme are avoided through the careful use of embedded (including overall Scheme design) and additional mitigation. Whilst two residual significant adverse effects are identified in relation to hedgerows and 'breeding birds - ground nesting birds of open habitat', the effects are localised and the Scheme also delivers ecological enhancements in accordance with national and local policy. Paragraphs 8.3.86 to 8.3.105 of the **Planning Statement [APP-267]** consider flood risk and conclude that the Scheme complies with the relevant policies. Paragraphs 8.3.106 to 8.3.138 of the **Planning Statement [APP-267]** consider the historic environment and conclude that the Scheme complies with the relevant policies in relation to

Reference	Theme	Comments/Issues Raised	Applicant's Response
		each matter that consent should be refused.	historic environment. Furthermore, **Annex A: National Policy Accordance Tables** and **Annex B: Local Policy Accordance Tables of the Planning Statement [APP-267]** set out in detail how the Scheme complies with national and local planning policy, including heritage, flood risk and ecology policies. Section 9.4 of the **Planning Statement [APP-267]** sets out the planning balance, considering the positive, neutral and negative impacts of the Scheme. Taking these into account and having regard to all important and relevant matters, it is concluded that there are no adverse impacts of sufficient weight, either on their own or collectively, that would mean the DCO should not be made. The adverse impacts identified are clearly outweighed by the substantial public benefits that would arise from the provision of low carbon energy to meet the need identified in NPS EN-1. Section 9.5 of the **Planning Statement [APP-267]** considers the critical national priority presumption and how the Scheme complies with the tests set out in NPS EN-1 and therefore why the CNP presumption applies to the Scheme. As set out in paragraph 9.5.6 of the **Planning Statement [APP-267]**, it is considered that even without applying the CNP presumption, the planning case is firmly in favour of development consent being granted.
MNH-014	Soils and Agriculture	CONCLUSION I request the Examining Authority to give the deepest possible consideration to all the points made above, which are far from exhaustive of all the possible objections to this dystopian scheme. 8 January 2026	The Applicant notes that matters have been addressed in the Applicant's responses to this Relevant Representation above.

6.15 Naomi Reynolds

Table 6-15 RR-3411

Reference	Theme	Comments/Issues Raised	Applicant's Response
NR-001	Soils and Agriculture Transport and Access Ecology and Biodiversity	I oppose the use of productive agricultural land and green field sites for large scale solar farms as I am concerned about our countries national security and our ability to be able to feed ourselves. As well as the impact this development will have on my local community and area particularly during the building works. The disruption in the lanes and villages surrounding the development will be severe as these lanes and villages already receive a lot of through traffic and the lanes are already in a poor state, the number of lorries having to use the lanes to access the development will cause further damage to the roads and verges, increase the risk of accidents and delays and damage the wildlife in the hedgerows and fields bordering the roads.	<u>Use of Agricultural Land</u> An assessment of the potential effects of the Scheme on soils and agricultural land is provided in **ES Volume 1, Chapter 17 Soils and Agriculture [APP-069]**. This chapter considers baseline agricultural land quality, including Best and Most Versatile (BMV) land, and assesses likely significant effects arising from construction, operation and decommissioning of the Scheme, together with embedded mitigation measures. The areas of each Agricultural Land Classification (ALC) grade affected by the Scheme are set out in **ES Chapter 17**, Section 17.7. Of the agricultural land within the Solar PV Sites, approximately 477.4 hectares (around 67%) is classified as Subgrade 3b or Grade 4 and is therefore not BMV land. There is no Grade 1 land, around 30.8 hectares (approximately 4%) of Grade 2 land, and approximately 209.3 hectares (around 29%) of Subgrade 3a land. The distribution of ALC grades is shown in **ES Volume 2, Figure 17-2: Agricultural Land Classification Mapping [APP-172]**. The Applicant has had regard to agricultural land quality in the design and site selection process and has sought, where practicable, to locate infrastructure on lower quality land. The Scheme will result in a temporary but long-term and reversible loss of agricultural land for the operational life of the Scheme. As set out in **ES Chapter 17**, Section 17.10, this gives rise to a temporary, long-term moderate adverse effect on agricultural land overall, and a temporary, long-term major/moderate adverse effect on BMV land, both of which are assessed as significant. These effects are fully reported in the ES and are a matter for the Secretary of State to weigh in the planning balance against the need for the Scheme and its wider benefits. There are no significant permanent effects on

Reference	Theme	Comments/Issues Raised	Applicant's Response
			agricultural land, as all land will be returned to its original use and condition as far as practicable following decommissioning. In relation to suggestions that brownfield land or alternative locations should be used, including rooftop, these matters are addressed in **ES Volume 1, Chapter 4 Alternatives and Design Evolution** and in the **Statement of Need [APP-056 and APP-266]**. The Applicant has considered alternatives, including previously developed land and other forms of solar deployment, as part of the site selection and design evolution process. As shown in Table 2-2 of **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]**, the Applicant has considered previously developed land/brownfield land over 1 hectare within the area of search, based on the brownfield land registers of the relevant Local Planning Authorities, and concluded that none of the sites are large enough to provide a viable land parcel of at least 40 ha and sites were not considered to be available as they have planning permission for residential development and/or are allocated for residential/mixed use development. National policy and government guidance, as set out in the **Statement of Need [APP-266]**, recognise that while rooftop and smaller-scale solar installations are an important part of the energy mix, they cannot alone meet the scale of capacity required to achieve clean power and net zero objectives. Large-scale ground-mounted solar therefore remains necessary in addition to, not instead of, rooftop solar. Food Security The Applicant does not consider that food security will be compromised by the Scheme (or solar energy more widely). The latest figures to September 2024 indicate that solar occupied around 21,200 ha of agricultural land in the UK. In 2025, 545,000

Reference	Theme	Comments/Issues Raised	Applicant's Response
			ha of arable land in England were left uncropped (source: Department for Environment, Food & Rural Affairs, Agricultural land use in England at 1 June 2025). It should also be noted that The latest figures to September 2024 indicate that solar occupied around 21,200 ha of agricultural land in the UK. In 2025, 545,000 ha of arable land in England were left uncropped (source: Department for Environment, Food & Rural Affairs, Agricultural land use in England at 1 June 2025). It should also be noted that food security is not identified as an issue within the suite of Energy National Policy Statements or the National Planning Policy Framework (NPPF). Further, the Government's UK Solar Roadmap (2025 UK Solar Roadmap (2025) states that solar development is not considered to compromise food security, but that the but that the climate and nature crisis and nature crisis poses the greatest long-term risk to food security security- a risk which the Scheme directly helps to address by providing a secure, low-carbon source of electricity. As set out in Section 2 of the **Outline Decommissioning Strategy [APP-279],** post-decommissioning of the Scheme, the landowners would choose how the land is to be used and managed. The landowner may return all of the land to arable use, although it is likely that established habitats such as hedgerows and woodland would be retained given their potential benefits to agricultural land and the wider farming estate. Construction Phase The likely significant effects of the Scheme during the construction phase are assessed throughout the **ES [APP-052 to APP-265]**, including effects on traffic and transport, noise and vibration, air quality, landscape and visual amenity, ecology, and local communities.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Where likely significant effects are identified, appropriate mitigation measures are incorporated into the Scheme. Measures to limit disruption during construction are set out in the **Outline Construction Environmental Management Plan (CEMP) [APP-277]**. Requirement 13 in Schedule 2 to the **Draft DCO [APP-016]** secures that no part of the authorised development may commence until a CEMP is submitted to and approved by the relevant planning authority. The CEMP must be substantially in accordance with the **Outline CEMP [APP-277]**, and all construction works associated must be carried out in accordance with the approved CEMP. <u>Transport and Access</u> The effects of construction traffic on the local highway network are assessed in **ES Volume 1, Chapter 13: Transport and Access [APP-065]**, which considers construction vehicle routing, traffic volumes and potential impacts on highway safety and road condition. The assessment concludes that, with appropriate management measures in place, construction traffic effects can be appropriately controlled. Mitigation measures to manage construction traffic and protect local roads are set out in the **Outline Construction Traffic Management Plan (Outline CTMP) [APP-287]**. The **Outline CTMP [APP-287]** has been developed to minimise impacts on the local highway network and includes measures for routing, scheduling of deliveries and liaison with the local highway authority. A road condition and dilapidation survey of minor roads not typically used by HGV traffic is included as a measure within the

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Outline CTMP. Any damage to verges or carriageway surfaces caused by construction vehicles will be rectified to the satisfaction of the local highway authority. The preparation, approval and implementation of the final CTMP, substantially in accordance with the outline CTMP, are secured through Requirement 15 of Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring construction traffic impacts, including potential damage to local roads, are appropriately managed throughout the construction phase of the Scheme. The potential effects of construction traffic on highway safety and accident risk are assessed in **ES Volume 1, Chapter 13: Transport and Access [APP-065]**, which considers changes in traffic flows, HGV movements and accident risk on the local road network. Links experiencing traffic increases above defined assessment thresholds were taken forward for detailed analysis. Supporting technical evidence is provided in **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]**, which includes an assessment of baseline accident data and predicted changes in collision risk arising from construction traffic. The assessment concludes that the level of construction traffic associated with the Scheme is unlikely to materially affect road safety on links within the Study Area, and no significant adverse effects on accident risk are anticipated. <u>Ecology and Biodiversity</u> Potential impacts on ecology and biodiversity are fully assessed in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**. This assessment considers baseline ecological conditions and evaluates likely significant effects arising during the

Reference	Theme	Comments/Issues Raised	Applicant's Response
			construction, operation and decommissioning phases of the Scheme. It identifies avoidance, mitigation and enhancement measures to address potential impacts on habitats and protected and notable species. It also identifies opportunities for ecological enhancement, including the creation and long-term management of habitats, and delivery of biodiversity net gain. The assessment concludes that, with the identified embedded and additional mitigation measures in place, no unacceptable significant adverse effects on ecology and biodiversity are anticipated. The Applicant is discussing the approach to the assessment in relation to ecology and biodiversity in general with Wiltshire Council and Natural England and this discussion is set out in the relevant **Statements of Common Ground** to be submitted at Deadline 1. During construction, specific measures are proposed to avoid disturbance and displacement of wildlife. These include protective buffers around sensitive habitats and features, timing restrictions on vegetation clearance, pre-construction ecological surveys, species-specific mitigation, and pollution prevention controls which are set out in the **Outline Ecological Protection and Mitigation Strategy (EPMS) [APP-284]**. Measures to protect trees and hedgerows are also set out in **ES Volume 1, Chapter 10 Arboriculture [APP-062]**. The Scheme will also result in the cessation of intensive arable farming within the Solar PV Sites. As identified in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**, this is expected to reduce the ongoing application of herbicides and pesticides, supporting improvements in habitat quality over the operational lifetime of the Scheme. The reversion of existing arable land within the Solar PV Sites to predominantly grassland habitats can be expected to benefit a wide range protected and notable species, as identified in **ES Volume 1, Chapter 9:**

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Ecology and Biodiversity [APP-061]. Mitigation and enhancement measures are detailed in the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]** and the **Outline Ecological Protection and Mitigation Strategy (OEPMS) [APP-284]**, which set out habitat creation, species protection measures, buffer zones and long-term ecological management. The preparation, approval and implementation of the detailed Landscape and Ecological Management Plan, substantially in accordance with the **OLEMP [APP-283]**, are secured through Requirement 7 in Schedule 2 of the **Draft Development Consent Order [APP-016]**. The preparation, approval and implementation of the detailed Ecological Protection and Mitigation Strategy, substantially in accordance with the **OEPMS [APP-284]**, are secured through Requirement 8 in Schedule 2 of the **Draft Development Consent Order [APP-016]**. These requirements ensure that ecological protection and enhancement measures are delivered and maintained throughout construction and operation of the Scheme.

6.16 Deirdre Booty

Table 6-16 RR-1127

Reference	Theme	Comments/Issues Raised	Applicant's Response
DB-001	Ecology and Biodiversity Soils and Agriculture	I object to this project for the following reasons Loss of arable land is a threat to biodiversity. Loss of this land is a threat to our future food security , once it's lost it's gone forever.	Potential impacts on ecology and biodiversity are fully assessed in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**. This assessment considers baseline ecological conditions and evaluates likely significant effects arising during the construction, operation and decommissioning phases of the Scheme. It identifies avoidance, mitigation and enhancement measures to address potential impacts on habitats and protected and notable species. It also identifies opportunities for ecological enhancement, including the creation and long-term management of habitats, and delivery of biodiversity net gain. The assessment concludes that, with the identified embedded and additional mitigation measures in place, no unacceptable significant adverse effects on ecology and biodiversity are anticipated. The assessment identifies embedded and additional mitigation measures and concludes that, with these measures in place, no unacceptable significant adverse effects on ecology and biodiversity are anticipated The Applicant is discussing the approach to the assessment in relation to ecology and biodiversity in general with Wiltshire Council and Natural England and this discussion is set out in the relevant **Statements of Common Ground** to be submitted at Deadline 1. During construction, specific measures are proposed to avoid disturbance and displacement of wildlife. These include protective buffers around sensitive habitats and features, timing restrictions on vegetation clearance, pre-construction ecological surveys, species-specific mitigation, and pollution prevention controls which are set out in the **Outline Ecological Protection and Mitigation Strategy (EPMS) [APP-284]**. Measures to protect trees and hedgerows are also set out in **ES Volume 1, Chapter 10 Arboriculture [APP-062]**.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			The Scheme will also result in the cessation of intensive arable farming within the Solar PV Sites. As identified in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**, this is expected to reduce the ongoing application of herbicides and pesticides, supporting improvements in habitat quality over the operational lifetime of the Scheme. The reversion of existing arable land within the Solar PV Sites to predominantly grassland habitats can be expected to benefit a wide range protected and notable species, as identified in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061].** Mitigation and enhancement measures are detailed in the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]** and the **Outline Ecological Protection and Mitigation Strategy (OEPMS) [APP-284]**, which set out habitat creation, species protection measures, buffer zones and long-term ecological management. The preparation, approval and implementation of the detailed Landscape and Ecological Management Plan, substantially in accordance with the **OLEMP [APP-283]**, are secured through Requirement 7 in Schedule 2 of the **Draft Development Consent Order [APP-016]**. The preparation, approval and implementation of the detailed Ecological Protection and Mitigation Strategy, substantially in accordance with the **OEPMS [APP-284]**, are secured through Requirement 8 in Schedule 2 of the **Draft Development Consent Order [APP-016]**. These requirements ensure that ecological protection and enhancement measures are delivered and maintained throughout construction and operation of the Scheme. <u>Soils and Agriculture</u> The effects of the Scheme on agricultural land and food production are assessed in **ES Volume 1, Chapter 17: Soils**

Reference	Theme	Comments/Issues Raised	Applicant's Response
			and Agriculture [APP-069], with supporting agricultural land classification data provided in **ES Volume 3, Appendix 17-1: Agricultural Land Classification and Soil Resource Survey Report [APP-243].** The assessment confirms that land would be removed from arable rotation for the operational life of the Scheme, anticipated to be approximately 60 years. While the primary agricultural use would cease during this period, the soil resource would be retained and would continue to perform its ecological functions. The assessment notes that reduced disturbance associated with the Scheme allows soils to recover from previous intensive agricultural use, with benefits to soil structure and soil biology over time. The Applicant does not consider that food security will be compromised by the Scheme (or solar energy more widely). The latest figures to September 2024 indicate that solar occupied around 21,200 ha of agricultural land in the UK. In 2025, 545,000 ha of arable land in England were left uncropped (source: Department for Environment, Food & Rural Affairs, Agricultural land use in England at 1 June 2025). It should also be noted that food security is not identified as an issue within the suite of Energy National Policy Statements or the National Planning Policy Framework (NPPF). Further, the Government's UK Solar Roadmap (2025) states that solar development is not considered to compromise food security, but that the climate and nature crisis poses the greatest long-term risk to food security- a risk which the Scheme directly helps to address by providing a secure, low-carbon source of electricity. As set out in Section 2 of the **Outline Decommissioning Strategy [APP-279],** post-decommissioning of the Scheme, the landowners would choose how the land is to be used and managed. The landowner may return all of the land to arable

Reference	Theme	Comments/Issues Raised	Applicant's Response
			use, although it is likely that established habitats such as hedgerows and woodland would be retained given their potential benefits to agricultural land and the wider farming estate.
DB-002	Other Environmental Matters	Risk to our dark skies due to industrial type security lighting .	TRhe effects of ighting is considered in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**, which considers its implications during construction, operational and decommissioning on landscape and visual receptors. The Landscape and Visual Impact Assessment (LVIA) has considered the construction, operational and decommissioning lighting proposals for the Scheme, with details of lighting design, directionality and intermittent lighting set out in **ES Volume 1, Chapter 3: The Scheme [APP-055]** and further discussed in **ES Volume 1, Chapter 20: Other Environmental Matters [APP-072].** The Scheme has been designed to minimise the need for external lighting. Lighting is not required within the Solar PV Arrays during the operational phase. Motion-sensing security lighting will be provided within substations and the BESS Area and will be used only for maintenance and security purposes. Temporary site lighting during construction and decommissioning will be required to enable safe working during hours of darkness. This lighting will be designed, as far as reasonably practicable, to minimise light spill outside the Site and Cable Route Corridor, particularly towards residential properties, highways and ecological receptors. Standard good practice measures will be employed to minimise glare and light spill during construction, operation and decommissioning. There will be no lighting on perimeter fencing. Measures to control construction lighting are set out in the **Outline Construction Environmental Management Plan [APP-277]**, and operational lighting controls form part of the

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Outline Operational Environmental Management Plan [APP-278]. The preparation, approval and implementation of detailed management plans, substantially in accordance with these outline plans, are secured through requirements in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring lighting impacts are appropriately controlled throughout the lifetime of the Scheme.
DB-003	Hydrology, Flood Risk and Drainage	Increased risk to flooding in an area already vulnerable. Our country lanes are not suitable for such heavy industry traffic . Why not retro fit all warehouses in the local area (near junction 17 for example) not just solar panels on the roof but cladding the walls, save the land for our children and future generations.	An assessment of the effects of the Scheme on flood risk both within the Site and the surrounding area is provided in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [APP-063]**, with supporting information provided in **ES Volume 3, Appendix 11-1 to 11-9: Flood Risk Assessment and Drainage Strategy [APP-210 to APP-218]**. The assessment concludes that, with the embedded mitigation measures secured, the Scheme would not result in a material increase in off-site flood risk, including to adjacent communities and downstream receptors, and that any on-site flood risk would be managed such that the Scheme remains safe and operable for its lifetime. The assessment has been prepared in accordance with national policy and best practice guidance and in consultation with the Environment Agency and Lead Local Flood Authority and is set out in the relevant **Statement of Common Ground** to be submitted at Deadline 1. The **Outline Construction Environmental Management Plan (Outline CEMP) [APP-277]** has been developed to control construction-phase risks and ensure there is no material increase in off-site flood risk. In accordance with NPS EN-3 (paragraph 2.10.84), the assessment differentiates between solar PV panel areas, which drain to the existing ground and therefore do not generally give rise to significant drainage effects, and associated infrastructure (for example access tracks,

Reference	Theme	Comments/Issues Raised	Applicant's Response
			temporary construction compounds, substations and the BESS) where runoff controls are required. Where drainage measures are necessary, these include permeable surfacing, infiltration features, swales and attenuation storage to manage surface water and maintain greenfield runoff behaviour, as applicable. Requirement 13 in Schedule 2 to the **Draft DCO [APP-016]** secures that no part of the authorised development can commence until a CEMP is submitted to and approved by the relevant planning authority. The CEMP must be substantially in accordance with the Outline CEMP, and all construction works associated must be carried out in accordance with the approved CEMP. The capacity of local roads and infrastructure to accommodate construction vehicles is assessed in **ES Volume 1, Chapter 13: Transport and Access [APP-065]**, which considers construction traffic volumes, vehicle types, route suitability and network performance. The assessment concludes that, with appropriate mitigation in place, there would be no significant adverse impacts on the local highway network. Supporting technical information is provided in **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]**, which identifies specific locations where traffic management measures or passing arrangements may be required on narrower sections of construction routes. The assessment presented in Annex H of **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]** demonstrates adequate carriageway width or frequency of passing place opportunity to pass at least an HGV and a light vehicle as requested in comments provided by Wiltshire Council. All construction routes also include passing points to allow two HGVs to pass.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Mitigation measures to manage construction traffic are set out in the **Outline CTMP [APP-287]**. The Outline CTMP is designed to minimise the effects of construction traffic on local roads and includes measures for vehicle routing, delivery scheduling and liaison with the local highway authority. The preparation, approval and implementation of the final CTMP, substantially in accordance with the outline CTMP, are secured through Requirement 15 of Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring construction traffic impacts on local roads and infrastructure are appropriately managed throughout the construction phase of the Scheme. In relation to suggestions that brownfield land or alternative locations should be used, including rooftops, these matters are addressed in **ES Volume 1, Chapter 4 Alternatives and Design Evolution** and in the **Statement of Need [APP-056 and APP-266]**. The Applicant has considered alternatives, including previously developed land and other forms of solar deployment, as part of the site selection and design evolution process. As shown in Table 2-2 of **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]**, the Applicant has considered previously developed land/brownfield land over 1 hectare within the area of search, based on the brownfield land registers of the relevant Local Planning Authorities, and concluded that none of the sites are large enough to provide a viable land parcel of at least 40 ha and sites were not considered to be available as they have planning permission for residential development and/or are allocated for residential/mixed use development. National policy and government guidance, as set out in the **Statement of Need [APP-266]**, recognise that while rooftop and smaller-scale solar installations are an important part of the

Reference	Theme	Comments/Issues Raised	Applicant's Response
			energy mix, they cannot alone meet the scale of capacity required to achieve clean power and net zero objectives. Large-scale ground-mounted solar therefore remains necessary in addition to, not instead of, rooftop solar.

6.17 Christopher Smith

Table 6-17 RR-0841

Reference	Theme	Comments/Issues Raised	Applicant's Response
CS-001	Description and DCO Process	I object to the Lime Down Solar Park proposal for a number of reasons. TECHNOLOGY AND COST Efficiency I object because the solar photovoltaic (PV) technology being proposed is inherently inefficient compared with other forms of energy generation. Solar panels convert roughly 15-22 % of sunlight into electricity and this relatively low conversion rate means solar farms require vast amounts of land to produce the same energy that a smaller footprint of fossil fuel or nuclear can generate. Solar farms in Britain are particularly poor in this regard and the World Bank, in its Photovoltaic Power Potential report from 2020, has found the UK to be the second-worst country for solar power.	Solar energy is at the heart of the Clean Power 2030 Mission (January 2026 revised NPS EN-3, Para 2.10.2) and it is the Government's view that a secure, reliable, affordable, net zero consistent system in 2050 is likely to be composed predominantly of wind and solar (NPS EN-1, Para 3.3.20). Sunlight, the input energy source for solar, is abundant, predictable, renewable, low carbon and free. Solar PV is a well-established and widely deployed form of renewable electricity generation that is capable of delivering reliable, large-scale low-carbon power over the lifetime of the Scheme. While technological efficiencies are expected to continue to improve over time, this does not reduce the effectiveness of solar PV as a means of reducing greenhouse gas emissions either now or in the future. The Scheme has been designed to allow for the replacement and upgrading of components during its operational life, enabling the use of more efficient technology as it becomes available, within the parameters assessed. This approach ensures that the Scheme remains effective and adaptable while continuing to deliver meaningful carbon savings Section 7.7 of the **Statement of Need [APP-266]** compares the annual energy generated per square kilometre from solar, from onshore wind and from crop-to-energy (biofuels) technology. The analysis shows that large-scale ground-mount solar schemes which maximise their annual output, are likely to produce a greater quantity of low carbon electricity per acre than the output from a crop-to-biogas application; and that the energy production from land under solar is of a similar order of magnitude to the energy production from land under onshore wind. Finally, the fact that other countries may experience higher

Reference	Theme	Comments/Issues Raised	Applicant's Response
			solar irradiation levels than the UK, means that they too could pursue solar generation to support their climate change plans. However, any such statistic cannot be used to demonstrate that solar in the UK does not work or should not be pursued. Government policy is clear that solar should be pursued in the UK with urgency because of the significant benefits it will bring to the UK energy system, consumers and to help meet UK clean power targets
CS-002	Climate Change and Energy Need	Reliability Solar energy is also intermittent and unreliable -" it only generates power when the sun is shining. Clouds, seasons, and night-time reduce production. This intermittency reduces reliability and increases the need for backup power sources. This a particular problem in Britain as, when it is most needed, in winter with low temperatures, there are/can be long periods of little sun and no wind again leading to the need for backup power sources. Such conditions can simultaneously prevail across Europe leading to a loss of interconnection supplies.	Figures 28 and 29 of the **Statement of Need [APP-266]** and related text (Section 8.5) demonstrate that a multi-technology approach to electricity supply, including solar, can reduce the effects of weather variability on output and is capable of closely matching a future projection of national electricity demand on a month-average level.
CS-003	Description and DCO Process Climate Change and Energy Need Site selection and Alternatives	Cost It is an expensive source of electricity. Solar power using Feed-in-Tariffs cost £229/MWh in FY2024/25 and with the cost of grid balancing and backup added, gives a total of £262/MWh, or more than three times the cost of gas-fired electricity, which is currently around £80/MWh including carbon costs of about £28/MWh. ROC-funded	Section 9.3 of the **Statement of Need [APP-266]** provides analysis of government data which show that solar is now a leading low-cost generation technology. Further, solar generation provides price protection for GB consumers by shielding them from the effects of volatile international energy markets, including gas. NPS EN-3 states that the government has "*committed to sustained growth in solar capacity to ensure that we are on a pathway that allows us to meet net zero emissions. As such*

Reference	Theme	Comments/Issues Raised	Applicant's Response
		solar, with a market value of around £67/MWh so far in 2025/26 plus an average of 1.44 Renewables Obligations certificates which have a buy-out value of ~£97/MWh, giving a basic cost of £163/MWh. Adding the grid balancing and backup costs gives a total of £196/MWh. Many new solar farms have come online this year and have brought down the average strike price for active Contracts-for Difference in 2025/26 to ~£69/MWh, of which about £67/MWh is the market price and about £2/MWh is subsidies. This looks competitive until the extra balancing and backup costs are added, bringing the total to ~£102/MWh. It is unlikely that solar is going to get any cheaper, because new projects were awarded at £72/MWh in AR6, higher than the current weighted average, and 20-year index-linked contracts at £78/MWh are being offered in AR7. In short, the full cost of even the cheapest solar projects is more expensive than gas.	*solar is a key part of the government's strategy for low-cost decarbonisation of the energy sector*" (Para 2.10.9). The Feed in Tariff scheme and the Renewables Obligation scheme are both closed to new entrants (such as the Scheme). The awarding, or mechanics of a Contract for Difference(CfD) is not a matter for this application, as it is a competitive process managed by a Government owned entity. The Applicant confirms that while the Scheme may be eligible to apply in future should it be consented, developers must submit bids into wider allocation rounds, where various technologies compete to secure an agreement for a set electricity price. This industry-standard mechanism is designed to provide necessary certainties that low-carbon energy is delivered at the least cost to the consumer.
CS-004	Ecology and Biodiversity	ENVIRONMENTAL IMPACT Habitat Disruption I object to this proposal due to habitat disruption. The extensive land area required will lead to ecosystem disruption and wildlife displacement. The conversion of land will disrupt natural processes. Clearing and	Potential impacts of the Scheme on ecology and biodiversity are assessed in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**, which considers baseline conditions and evaluates likely effects during construction, operation and decommissioning. The assessment identifies embedded and additional mitigation measures and concludes that, with these measures in place, no unacceptable significant adverse effects on ecology and biodiversity are anticipated.

Reference	Theme	Comments/Issues Raised	Applicant's Response
		grading during construction will cause soil erosion and increase sediment runoff into waterways. This area already floods, and covering the land with panels, tracks and infrastructure increases runoff and reduces natural absorption. There are serious questions about the drainage, water protection and downstream impacts. Solar panels create shading effects, altering ground temperature and moisture, which impacts plant growth and soil fertility. Fencing can impede animal movement, fragmenting habitats and limiting access to resources. This fragmentation can make it harder for species to find food, migrate, or reproduce. Highly reflective surfaces can disorient birds and insects, increasing collision risks. This can all contribute to local declines in vulnerable species. Large arrays of dark panels can create localized heat islands, potentially altering microclimates and there are concerns about unintended consequences on flora and fauna.	Potential effects relating to surface water runoff are assessed in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [APP-063]**, with supporting detail provided in the Flood Risk Assessment and Drainage Strategy appendices. The assessment considers how ground disturbance, construction traffic and installation of infrastructure could affect infiltration and runoff, and evaluates the implications for flood risk both within the Site and in surrounding areas. The assessment concludes that, with appropriate mitigation in place, the Scheme would not increase surface water runoff or flood risk. Surface water management and construction-phase controls to prevent increased runoff are secured through the **Outline Construction Environmental Management Plan [APP-277]** and the **Outline Drainage Strategy [APP-281]**, which include measures to control sediment, runoff and pollution during earthworks and infrastructure installation. The Scheme design incorporates fencing around the Solar PV Arrays that is permeable to wildlife, with the exception of deer. This means animals (excluding deer only) will be able to freely access habitats within the Solar PV Sites without the need for wildlife gates. In addition, wide buffers are retained around the peripheries of the Solar PV Sites to allow wildlife, including deer, to move between favoured habitats. These measures are described in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]** and detailed in the **Outline Ecological Protection and Mitigation Strategy (OEPMS) [APP-284]**. Evidence from published research indicates that large-scale solar arrays do not give rise to significant or widespread heat island effects. An 18-month study by Fthenakis and Yu (2013) found that solar arrays are typically fully cooled during night-time hours, meaning that sustained heat retention and associated heat island effects are unlikely to occur.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Further research by Barron-Gafford et al. (2016) concluded that any temperature increases associated with solar PV installations are localised and do not extend beyond the immediate boundary of the solar farm. As such, any microclimatic effects are limited in extent and rapidly dissipate with distance from the panels. On this basis, the microclimate and heat island effects associated with the Scheme are not considered to be significant, and no meaningful thermal stress, discomfort or change in local weather conditions is anticipated for nearby residents or surrounding land uses.
CS-005	Soils and Agriculture	Adverse Effect on Agriculture and Food Security I object to this proposal due to its detrimental effect on farmland. The development will displace valuable agricultural land which is a short-sighted approach in an uncertain world where food security should be a priority for every nation.	An assessment of the potential effects of the Scheme on soils and agricultural land is provided in **ES Volume 1, Chapter 17 Soils and Agriculture [APP-069]**. This chapter considers baseline agricultural land quality, including Best and Most Versatile (BMV) land, and assesses likely significant effects arising from construction, operation and decommissioning of the Scheme, together with embedded mitigation measures. The areas of each Agricultural Land Classification (ALC) grade affected by the Scheme are set out in Section 17.7 of **ES Volume 1, Chapter 17: Soils and Agriculture [APP-069]**. Of the agricultural land within the Solar PV Sites, approximately 477.4 hectares (around 67%) is classified as Subgrade 3b or Grade 4 and is therefore not BMV land. There is no Grade 1 land, around 30.8 hectares (approximately 4%) of Grade 2 land, and approximately 209.3 hectares (around 29%) of Subgrade 3a land. The distribution of ALC grades is shown in **ES Volume 2, Figure 17-2: Agricultural Land Classification Mapping [APP-172]**. The Applicant has had regard to agricultural land quality in the design and site selection process and has sought, where practicable, to locate infrastructure on lower quality land, as detailed in **ES Volume 3, Appendix 4-1 Site Selection**

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Assessment Report. The Scheme will result in a temporary but long-term and reversible loss of agricultural land for the operational life of the Scheme. As set out in **ES Volume 1, Chapter 17 Soils and Agriculture [APP 069]**, Section 17.10, this gives rise to a temporary, long-term moderate adverse effect on agricultural land overall, and a temporary, long-term major/moderate adverse effect on BMV land, both of which are assessed as significant. These effects are fully reported in the ES and are a matter for the Secretary of State to weigh in the planning balance against the need for the Scheme and its wider benefits. There are no significant permanent effects on agricultural land, as all land will be returned to its original use and condition as far as practicable following decommissioning. The Applicant is discussing the approach to assessing the quality of the agricultural land with Natural England and this discussion is set out in the relevant Statement of Common Ground to be submitted at Deadline 1. Measures to avoid and minimise effects on soils and agricultural land are embedded within the Scheme design and secured through Schedule 2, Requirement 17 of the **Draft DCO [APP-016]** which includes the preparation and implementation of a Soil Resources Management Plan (SRMP) in accordance with the **Outline SRMP [APP-280].** The SRMP will control soil handling, storage and reinstatement during construction, operation and decommissioning, and a requirement to prepare and implement a Decommissioning Strategy in accordance with the **Outline Decommissioning Strategy [APP-279],** which is secured by Schedule 2, Requirement 20 of the **Draft DCO [APP-016]**. Through the establishment and maintenance of long-term

Reference	Theme	Comments/Issues Raised	Applicant's Response
			grassland beneath and between the solar arrays, soil health, quality and structure are anticipated to improve over the lifetime of the Scheme, resulting in a temporary, moderate beneficial effect on soil resources at decommissioning, which is assessed as significant (Sections 17.10 and 17.12 of **ES Volume 1, Chapter 17: Soils and Agriculture [APP-069]**). The Applicant does not consider that food security will be compromised by the Scheme (or solar energy more widely). The latest figures to September 2024 indicate that solar occupied around 21,200 ha of agricultural land in the UK. In 2025, 545,000 ha of arable land in England were left uncropped (source: Department for Environment, Food & Rural Affairs, Agricultural land use in England at 1 June 2025). It should also be noted that food security is not identified as an issue within the suite of Energy National Policy Statements or the National Planning Policy Framework (NPPF). Further, the Government's UK Solar Roadmap (2025) states that solar development is not considered to compromise food security, but that the climate and nature crisis poses the greatest long-term risk to food security- a risk which the Scheme directly helps to address by providing a secure, low-carbon source of electricity. As set out in Section 2 of the **Outline Decommissioning Strategy [APP-279],** post-decommissioning of the Scheme, the landowners would choose how the land is to be used and managed. The landowner may return all of the land to arable use, although it is likely that established habitats such as hedgerows and woodland would be retained given their potential benefits to agricultural land and the wider farming estate.

Reference	Theme	Comments/Issues Raised	Applicant's Response
CS-006	Landscape and Visual	Adverse Effect on Landscape I object to this proposal because of the adverse visual effect on the local landscape. Large solar installations fundamentally alter landscapes. The panels, inverters, transformers, BESSs and fencing will create an industrial appearance that is very unattractive and completely out of place in the countryside; this will worsen the daily living experience for residents and will diminish the appeal of this area for visitors, with a knock-on effect on local businesses.	An assessment of landscape and visual effects is provided in the Landscape and Visual Impact Assessment (LVIA) presented in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**. The LVIA assesses effects on identified landscape and visual receptors, including residential properties and users of public rights of way, and identifies where significant effects may occur. The LVIA **[APP-060]** recognises there would be Significant adverse effects on the Landscape character within the 1 km Study Area of the Site initially as a result of the change in land use from agricultural land to solar infrastucture. However, these effects would reduce to non-significant once the extensive mitigation measures mature. The LVIA found no significant long term visual effects to Residential Properties as a consequence of the Scheme. **ES Volume 3, Appendix 8-3-3: Summary of Visual Effects [APP-192]** provides a summary of the visual effects on Private Receptors. The scale of development within the Order Limits has been significantly reduced from the layout assessed in the Preliminary Environmental Information Report (PEIR) through an iterative design process undertaken in response to consultation and in accordance with the mitigation hierarchy to avoid, reduce and mitigate adverse effects. As part of this design evolution, panels along the edge of the Cotswolds National Landscape and along the Fosse Way have been removed. These measures are set out in Section 8.9 of the **LVIA [APP-060].** Mitigation measures to address landscape and visual effects are set out in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**, Figure 3-4-1 to 3-4-5.2 **Landscape and**

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Ecology Mitigation Plan [APP-084] and detailed within the **Outline Landscape and Ecological Mitigation Plan (OLEMP) [APP-283]** and the **Outline Ecological Protection and Mitigation Strategy (OEPMS) [APP-284]**. These documents include proposals for new and enhanced planting, retention of existing hedgerows and woodland, and landscape integration measures to reduce visual effects over time. In addition, the Scheme design incorporates minimum offsets from existing landscape features, including residential properties, ancient woodland, woodland, hedgerows, public rights of way and watercourses, to further limit visual impacts. The preparation, approval and implementation of detailed landscape and ecological management plans, substantially in accordance with the **OLEMP [APP-283]** and **OEPMS [APP-284]**, are secured through requirements in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that the identified mitigation measures are delivered and maintained throughout the lifetime of the Scheme. An assessment of the likely effects of the Scheme on the local economy and employment is provided in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]**. This chapter considers potential impacts on construction and engineering sectors, agricultural activity, tourism-related businesses, and wider local economic conditions during construction, operation and decommissioning. Supporting evidence is provided in **ES Volume 3, Appendix 16-3: Socio-Economics, Tourism and Recreation – Summary of Non-Significant Effects [APP-242]**, which summarises that effects on the local economy and economic prosperity are assessed as negligible to minor beneficial, with construction expenditure and employment generation

Reference	Theme	Comments/Issues Raised	Applicant's Response
			contributing positive, temporary effects on local economic activity. The assessment therefore concludes that the Scheme would not result in significant adverse effects on local businesses or the wider local economy, and that socio-economic benefits, including job creation and local supply-chain opportunities, are expected during the construction phase, with more modest economic and skills and supply chain opportunities during the operational phase. The Applicant notes that the approach to assessment of socio-economic effects has been agreed with Wiltshire Council's Economic and Regeneration Team, with the exception of matters relating to agricultural employment, which the Applicant is discussing with the team. This is set out in the Statement of Common Ground with Wiltshire Council to be submitted at Deadline 1.
CS-007	Cultural Heritage	The proposed site is rich in history with Roman roads, medieval landscapes, listed buildings and archaeological assets, all within or beside the site. There are 118 archaeological assets, of which at least 23 will be damaged, according to Island Green Power, the applicant. Once disturbed or damaged, this heritage cannot be replaced.	The potential effects of the Scheme on archaeological assets are fully assessed in **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, supported by detailed technical appendices in **ES Volume 3, Appendices 12-2 to 12-5 [APP-220 to APP-229]**. The assessment considers baseline archaeological conditions, identifies known and potential archaeological assets within the study area, and evaluates likely effects during construction, operation and decommissioning. The chapter concluded that, following mitigation, the residual effects on any archaeological assets, would be neutral/negligible and therefore not significant (see **Volume 3, Appendix 12-8 Cultural Heritage Impact Assessment Tables [APP-232]**). The assessment is informed by desk-based research, geophysical surveys and evaluation trenching, which have been undertaken to identify areas of archaeological potential and to

Reference	Theme	Comments/Issues Raised	Applicant's Response
			refine the Scheme design where practicable to avoid harm. Where impacts cannot be avoided, embedded mitigation measures are set out in Section 12.9 of **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, with additional mitigation detailed in Section 12.11. The Applicant notes that the approach to the assessment in relation to archaeological sites has been agreed with Historic England and Wiltshire Council and the methodology for the mitigation strategy is under discussion and is set out in the relevant Statements of Common Ground to be submitted at Deadline 1**.** An overarching archaeological mitigation strategy is provided in **ES Volume 3, Appendix 12-6: Outline Archaeological Mitigation Strategy [APP-230]**, which sets out the framework for further archaeological investigation, recording and protection where ground disturbance is required. The preparation, approval and implementation of detailed archaeological Written Schemes of Investigation for each part of the Proposed Development, substantially in accordance with the **Appendix 12-6 Outline Archaeological Mitigation Strategy [APP-230]**, are secured through Requirement 12 of Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that appropriate protection, recording and mitigation are delivered during the relevant part of the Proposed Development.
CS-008	Noise and Vibration	Noise Pollution I object because of the noise pollution that it will produce. We have a very small solar farm (tiny in comparison to Lime Down) north of Hullavington which can be heard from some	The noise impacts from the operation of the Scheme and its components are assessed in Section 14.10 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**. As explained in Section 14.4 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]** noise from moveable panels would not be audible at residential properties. As shown in Table 8 of **ES Volume 3, Appendix 14-4: Noise Modelling [APP-237]**, levels

Reference	Theme	Comments/Issues Raised	Applicant's Response
		hundreds of yards away given the right atmospheric conditions. Given the size of Lime Down and, in particular, its BESSs and movable panels, the noise levels will be a lot higher and affect many more houses and villages. The predicted 'incessant hum' from cooling fans, inverters, and transformers would severely impact residents' ability to sleep, enjoy their homes, or use their gardens. The models used to simulate likely noise levels are known to be flawed and it is highly likely that noise levels will be much higher than modelled.	would typically be below or slightly above the existing background sound in the area. The levels have been calculated, using the appropriate international standard, on a worst-case assumption that wind is blowing from the source of the noise to the receptor locations, as stated in paragraph 14.4.15 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**. The **Outline Operational Environmental Management Plan [APP-278]** commits to noise levels from the Scheme at residential dwellings being the same as or below those modelled in the ES. This is likely to include a significant number of silencer units and enclosures and provides assurance that significant effects from operational noise will be avoided, while allowing flexibility in how this is achieved. The preparation, approval and implementation of the detailed OEMP, substantially in accordance with the outline plan, are secured through Requirement 14 of Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring operational noise is appropriately controlled throughout the lifetime of the Scheme.
CS-009	Construction and Decommissioning	Manufacture and Disposal I object because solar farms are environmentally destructive, firstly in their construction due to the mining and other activities required to produce the materials to make solar panels and lithium batteries. Their life is relatively limited and there are significant concerns about the disposal of them, particularly that companies are not putting aside sufficient funding to cover eventual disposal costs.	The environmental effects associated with the manufacture, resource extraction, and disposal of Scheme components are assessed in **ES Volume 1, Chapter 7: Climate Change [APP-059]** and **Chapter 20: Other Environmental Matters [APP-072]**. The Applicant confirms that the Scheme would not give rise to significant effects in relation to minerals, materials or waste, and that embedded mitigation measures and good practice would be applied throughout the construction, operation & decommissioning phases. The ES also identifies embedded mitigation measures across the Scheme, including the use of durable components with long operational lifespans, allowances for replacement over time, and the recyclability of key components such as solar panels, batteries and electrical equipment. These measures reduce the

Reference	Theme	Comments/Issues Raised	Applicant's Response
			need for ongoing extraction of virgin materials and limit long-term environmental impacts. The Materials and Waste assessment also confirms that the Scheme will follow the waste hierarchy, prioritising reuse and recycling wherever reasonably practicable, with disposal as a last resort. An **Outline Site Waste Management Plan [APP-281]**, **Outline Construction Environmental Management Plan [APP-277]**, **Outline Operational Environmental Management Plan [APP-278]** and **Outline Decommissioning Strategy [APP-279]** have been submitted with the Application, which set out how waste — including BESS components — will be managed during construction, operation and decommissioning. These documents commit to segregation of materials on-site and to the use of appropriately licensed waste contractors and facilities.
CS-010	Other Environmental Matters	SAFETY HAZARDS I object to this proposal due to its inherent safety risks. Although rare, battery storage systems can experience thermal runaway, leading to fires that are difficult to extinguish and can produce toxic smoke. Globally there have been many instances of such fires in recent years and they represent a significant safety risk when, as will be the case for Lime Down, they are sited near homes and schools. From my own perspective, as a Hullavington resident, the village will be within a mile of the proposed BESS, meaning I and every other resident will be directly exposed to the risks, impacts, and consequences of this installation. The applicant has not	The Applicant has followed National Fire Chiefs Council (NFCC) guidance and commissioned a Plume Assessment Study to model toxic gas emissions and visibility impacts from a BESS fire on all sensitive receptors within a 1km radius of the BESS area, as detailed in **ES Volume 3, Appendix 15-2: BESS Fire Emissions Modelling [APP-239]**. The fire emissions modelled in the report were based upon recent UK Health Security Agency (UKHSA) requests for DCO BESS projects which explore both immediate air quality impacts together with annual UK air quality requirements. The UKHSA is a statutory consultee for the Scheme and has confirmed that they are satisfied with the Applicant's submitted documentation and Plume Assessment Study methodology and results. Six worst case BESS fire locations (i.e. locations within the BESS Area closest to sensitive receptors) have been modelled as depicted in **ES Volume 2, Figure 15-5: Battery Energy Storage System Fire Emissions Study Area [APP-166]**. The concentrations of carbon monoxide (CO), formaldehyde,

Reference	Theme	Comments/Issues Raised	Applicant's Response
		demonstrated how a major incident could be contained, controlled, or prevented from affecting the village, the school, the surrounding communities, or the nearby mainline railway. The siting of the BESS so close to homes and critical infrastructure is wholly inappropriate and represents an unacceptable and unmanageable risk to public safety.	hydrogen chloride (HCl), hydrogen cyanide (HCN), hydrogen fluoride (HF), ammonia (NH_3), nitrogen dioxide (NO_2) and particulates from a potential BESS fire have been modelled using an air quality dispersion model to determine the likely effects on human health. A high-level visibility assessment has also been undertaken using the modelled particulates results to determine the effect of BESS fire emissions on visibility on the local road and rail network to inform the **Outline Battery Safety Management Plan (OBSMP) [APP-286].** The Plume Assessment Study has concluded that there are no significant toxic emission or visibility impacts at all sensitive receptor locations. The Applicant has also committed to commissioning an additional Plume Analysis Study at the detailed design stage as stipulated in Section 5.5.9 of the OBSMP and secured through the DCO: "*..at the detailed design stage a BESS system and site specific Plume Analysis study will be conducted to assess the environmental impact of a site incident to sensitive receptors within a 1 km radius. Toxic gas emissions to sensitive receptors must be below relevant public health exposure limit guidelines when the battery system of a BESS is fully consumed (burnt out), production of Particulate Matter (PM) and a visibility impact assessment on any transport links within a 1 km radius of the BESS area will also be included. The ERP produced at the detailed design stage (template outlined in Section 5.4.9 -5.4.11) will incorporate all necessary emergency response procedures and actions based upon thermal runaway test data supplied by the BESS system provider*." The Scheme layout also incorporates separation distances between battery containers to ensure that any isolated fire

Reference	Theme	Comments/Issues Raised	Applicant's Response
			would not become widespread or lead to a major incident. As shown on **ES Volume 2, Figure 3-1: Indicative Site Layout Plan [APP-081]**, the battery containers will be located more than 200 metres from the nearest Public Right of Way and more than 500 metres from any residential receptors. The **Outline Battery Safety Management Plan (OBSMP) [APP-286]** was prepared for the Scheme using guidance from Dorset and Wiltshire Fire and Rescue Service and incorporating recommendations of the National Fire Chiefs Council. Section 5 of the OBSMP covers all requisite firefighting requirements for the Scheme including fire service access, firefighting water supply, and emergency planning requirements. The Applicant is in the process of agreeing a Statement of Common Ground (SOCG) with D&WFRS to provide assurance that all safety and emergency response requirements are fulfilled, details are set out in the relevant **Statement of Common Ground** to be submitted at Deadline 1. Section 6.1.1 of the OBSMP confirms that at the detailed design stage, the selected BESS will have undertaken Large Scale Fire Testing (LSFT) to fully inform inputs for risk assessment tools which will be utilised together with detailed consequence modelling to provide a comprehensive site operations and emergency response safety audit. LSFT is a mandatory requirement under National Fire Protection Association- NFPA 855 (2026) safety standards to demonstrate thermal insulation protection capabilities of the BESS enclosure design, validate minimum equipment spacing distances, and demonstrate that deflagrations do not occur and/or can be safely constrained. All risk assessments to be conducted at detailed design for BESS projects required by the Health and Safety Executive (HSE) to assess fire and explosion risk are stipulated in Section

Reference	Theme	Comments/Issues Raised	Applicant's Response
			6.1.5 of the OBSMP. As set out in the **Outline Battery Safety Management Plan (OBSMP) [APP-286]**, the BESS Area will have a robust and validated Emergency Response Plan (ERP), developed in consultation with Dorset & Wiltshire Fire and Rescue Service at the detailed design stage. Section 5.4 of the OBSMP specifies the typical emergency response protocols, procedures and safety information that will be included in the ERP. The ERP will apply to all stages of the Scheme, including construction, operation, and decommissioning. Section 5.4.9 – 5.4.11 of the OBSMP stipulates that the ERP will follow NFCC and NFPA 855 (2026) guidelines and stipulates the minimum content that an ERP must contain, including: *"Emergency procedures for all credible hazards and risks, including building, infrastructure and vehicle fire, wildfires, impacts on local respondents, impacts on transport infrastructure."* The **OBSMP [APP-286]** is secured through Requirement 6 (Battery safety management) in Schedule 2 of the **Draft DCO [APP-016]**, which provides that Work No. 2 (which relates to works required to construct the BESS) must not commence until a Battery Safety Management Plan has been submitted to and approved by the relevant planning authority. The approved plan must be substantially in accordance with the Outline Battery Safety Management Plan. The Draft DCO also requires the relevant planning authority to consult with Dorset and Wiltshire Fire and Rescue Service and the Environment Agency before determining the application for approval of the Battery Safety Management Plan, and that the Battery Safety Management Plan must be implemented as approved.
CS-011	Transport and Access	CONSTRUCTION TRAFFIC I object to the construction traffic	The trip generation for the construction phase has been calculated based on a detailed and realistic breakdown of the

Reference	Theme	Comments/Issues Raised	Applicant's Response
		proposals, which rely on narrow rural lanes that are physically incapable of safely accommodating the volume of HGVs required. Independent analysis shows the applicant has underestimated traffic by over 40%, meaning more than 100 HGV movements per day on single track roads used by schoolchildren, walkers, cyclists, and local residents. This creates an unacceptable and unmanageable safety risk, particularly where there are no pavements, limited verges, blind bends, and multiple public rights of way. Many of the local cycling and walking routes use the very lanes and rights of way that would be dominated by HGV traffic, construction noise, dust, and industrial fencing. What are currently peaceful, restorative walks and cycle rides will become unpleasant, unsafe, and in some cases effectively unusable. These walks connect residents to nature, link villages, support local businesses, and attract visitors. The proposal would destroy the qualities that make these routes special, replacing them with noise, intimidation, and industrialisation.	likely quantities and material volumes required to build out the various sites and cable routes. A breakdown of Solar PV Sites Trip Generation Calculations is provided at **Annex E to ES Vol 3, 6.3 Appendix 13-1 Transport Assessment [APP-233].** This presents specific assessed quantities of material volumes and component type/numbers for each Lime Down Solar PV Site. Further notes have been added for clarity, with an additional breakdown of Trip Generation based on construction phasing. In relation to modules and mounting structures a1.2 'Ratio' factor is included, and this figure represents a reduced loading factor per HGV, based on the difference in size between a High Cube and a standard container. The assessments assume standard sized containers, presenting a reasonable-worst case assessment. In practice a majority of modules and mounting structures will be delivered by HQ containers, reducing the assumed number of HGVs, with the exception of Lime Down Site E and the eastern section of Site D, which are accessible via the low bridge on the A429. Aggregate volumes for access tracks for example have been assessed on a site-by site basis in accordance with each sites relative size. This is included within the calculations at **Annex E to ES Volume 3, Appendix 13-1: Transport Assessment [APP-233**]. There will be no site wide reprofiling required. It has been assumed that any excavated material will be reused on site. In the event of any spoil being taken off site, this will be undertaken by the same tippers used for incoming supply of aggregate. This has been clarified at Paragraph XX of **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233**].

Reference	Theme	Comments/Issues Raised	Applicant's Response
			In addition, the impact of these trips in the ES and Transport Assessment has been assessed based on worst case assumptions, including all phases and Solar PV Sites being constructed simultaneously and a 50% uplift to represent a peak day. This approach overestimates the trip generation in the construction period. The worked example below illustrates this: The construction route to Lime Down A-C included in **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233**] includes a peak day trip generation of 50 HGVs based on the worst-case assumptions, assuming all phases and Solar PV Sites being constructed simultaneously, plus a 50% uplift; 50 HGVs represents an estimate of the deliveries on a peak day, so does not represent a daily average; The daily average number of HGV construction movements is only 32 per day/7 per hour/one every 8 minutes (less than the journey time along the route); assuming a realistic construction programme, the average number of HGV construction movements along the route to Lime Down A-C is only 17 per day/less than 3 per hour/one every 25 minutes (less than the journey time along the route) In summary the trip generation and assessment work included in the DCO application is robust. An assessment of the effects of construction activities on air quality is provided in **ES Volume 1, Chapter 15: Air Quality [APP-067]**. The assessment considers potential emissions from construction dust, construction vehicle exhausts and Non-Road Mobile Machinery (NRMM), and has been undertaken in accordance with relevant best practice guidance. Further detail on the construction dust assessment is provided in **ES Volume 3, Appendix 15-1: Construction Dust Methodology and**

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Assessment [APP-238]. The assessment concludes that, with embedded mitigation measures in place, construction-phase air quality effects would not be significant. Mitigation measures to control dust and emissions during construction are set out in the **Outline Construction Environmental Management Plan [APP-277]** and the **Outline Construction Traffic Management Plan [APP-287]**. These include measures such as dust suppression, site management controls, routing and scheduling of construction traffic, and management of plant and machinery. The preparation, approval and implementation of detailed construction management plans, substantially in accordance with the outline plans, are secured through Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that air quality impacts during construction are appropriately controlled. The Applicant confirms that impacts to PROWs, unsurfaced roads, and the recreational use of the highway network have been assessed in **ES Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** and the supporting **ES Volume 3 Appendix 16-2 Tourism and Recreation Receptor Tables [APP-241]**. Consideration of the likely impact on views, character and the desirability of these routes to users has been fundamental to the assessment of likely significant effects. The Applicant confirms that the majority of significant adverse effects can be mitigated, however understands that some significant adverse effects to users of routes in Lime Down E cannot be mitigated further during construction. Otherwise, no significant adverse effects to PROW and recreational highway users are anticipated at any phase of the Scheme Mitigation

Reference	Theme	Comments/Issues Raised	Applicant's Response
			measures as set out in the **OCTMP [APP-287]** and **OPROWPPMP [APP-282]**, secured respectively by Requirements 15 and 16 in Schedule 2 to the **Draft DCO [APP-016]**, are deemed to be sufficient to ensure user safety, and maintain functional access to highways and PROWs for recreational use.
CS-012	Ecology and Biodiversity Landscape and Visual Socio-Economics, Tourism and Recreation	SUMMARY The Lime Down Solar Park is an inappropriate, and unacceptable industrial proposal that is going to devastate a large area of Wiltshire countryside. It will cause severe and lasting adverse effects on the inhabitants of the many villages in its footprint; it will industrialise a large area of unspoilt and historic countryside; it will fragment wildlife habitats and permanently damage the local environment, and it will endanger residents and wildlife both in its construction, subsequent operation and eventual disposal. For all of the above reasons, I strongly object to the proposal.	The Applicant notes that these matters have been addressed in the Applicant's responses to this Relevant Representation above.

6.18 Eva Elisabeth Sweet

Table 6-18 RR-1409

Reference	Theme	Comments/Issues Raised	Applicant's Response
EES-001	Socio-Economics, Tourism and Recreation	I own an equine facility that sits right in the middle of a proposed solar project, which will severely impact how the property can be used. It would completely prevent the proper exercise of the horses, forcing me to spend money to move them elsewhere for this purpose. I'm also trying to sell my property, and like many of my neighbours, I know this large-scale solar development will drastically reduce the value of the house, land, and associated assets. On a personal level, it's tearing apart a close-knit community that has always been supportive of one another.	The equestrian facilities at Ladyswood Farm & Stud have been assessed as a specific receptor in **ES Volume 3 Appendix 16-2 Tourism and Recreation Receptor Tables [APP-241]**. During construction, a medium-term temporary moderate-minor adverse effect is anticipated, as a result of proximity to Solar PV Arrays, a construction compound, cabling works, and HGV traffic on access and hacking routes. The Applicant has sought to mitigate these as much as possible through removing Solar PV Array areas (fields designated B2-B4 and A11-A12), and embedding design, transport, and PROW mitigation into the Scheme ahead of DCO submission. This has included providing landscape screening around Solar PV infrastructure, siting the construction compound in B1 as far as practicable from the paddocks at Ladyswood Farm & Stud, providing banksmen and speed limits where accesses interact with PROWs, through specifying HGV access routes to the Scheme, and through ensuring PROWs are kept open as much as practicable through construction, and entirely during the operational phase of the Scheme. These measures are secured through the **Works Plan [APP-007]**, **Outline LEMP [APP-283]**, **Outline CEMP[APP-0277]**, **Outline CTMP [APP-287]** and **oPROWPPMP [APP-282]** by Requirements 5, 7, 13, 15, and 16 respectively in Schedule 2 to the **Draft DCO [APP-016]**. As a result, it is not anticipate that the effects on Ladyswood Farm & Stud are anticipated to be significant. This also applied to individually assessed PROWs around Ladyswood, which subject to implementation of mitigation are not anticipated to experience significant adverse effects at any phase of the Scheme. Impacts of the Scheme on property prices have not been assessed as these have been agreed by the Planning Inspectorate to be scoped out of assessment in the ES, as set out in **ES Volume 3, Appendix 1-2 Scoping Opinion Response Table [APP-181]**. Resultantly, other impacts on the local property

Reference	Theme	Comments/Issues Raised	Applicant's Response
			market have not been assessed either. That notwithstanding, the Applicant has sought to minimise impacts upon residential properties and residential amenity through the mitigation measures secured by requirements in Schedule 2 to the **Draft DCO [APP-016]**. The Applicant has also assessed likely impacts on community and social wellbeing, and on the impacts of the Scheme on sense of community and sense of place (under then assessment category 'community identity, culture, resilience and influence') in **ES Chapter 18: Human Health [APP-070].** The assessment concludes that there are no significant adverse effects anticipated to population and community or social health and wellbeing. Consultation with Wiltshire Council's Public Health Team has informed the approach to mental health considerations, as documented in **ES Volume 3, Appendix 18-1: Human Health Consultation [APP-244].** Through this engagement, the Applicant has committed to signposting locally available mental health and wellbeing resources to members of the public engaging with the Scheme, using information provided by Wiltshire Council's Public Health Team. The Applicant will continue to monitor consultation responses relating to mental health and will provide appropriate signposting to existing local support services where requested. The Applicant notes that the assessment methodology for health and wellbeing has been agreed with Wiltshire Council's Public Health team and is set out in the relevant Statement of Common Ground to be submitted at Deadline 1**.**
EES-002	Landscape and Visual	It's simply unacceptable that such a massive project is even being considered, as it would scar one of the UK's most diverse rural landscapes.	The Scheme has been designed to deliver the greatest possible benefit from the available land and the available grid connection, whilst avoiding, minimising and/or mitigating harmful environmental effects. As per the description set out in **ES Volume 1, Chapter 3: The**

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Scheme [APP-055] the total area within the DCO Order Limits encompasses approximately 1,237 hectares (ha). Of this, the 'Solar PV Sites' comprise approximately 749.1 ha of land. Around 479.5 ha of this land is proposed as being required for installation of solar PV, battery storage, and associated infrastructure. The remaining 269.5 ha would provide areas dedicated to ecological mitigation, measurable Biodiversity Net Gain (BNG) delivery, landscaping, offsets and agricultural land managed for environmental enhancement and habitat creation. The Applicant remains committed to delivering a Scheme that makes a meaningful contribution to the UK's transition to net zero, while also seeking to minimise adverse impacts and maximise opportunities for environmental enhancement and community benefits.

6.19 Isobel Blackett

Table 6-19 RR-1961

Reference	Theme	Comments/Issues Raised	Applicant's Response
IB-001	Site selection and Alternatives Landscape and Visual	The Location is Fundamentally Wrong Poor Site Selection: The applicant chose this site primarily for commercial convenience (dealing with a few large landowners), not because it's the best environmental or community location. Better, less harmful locations closer to the grid connection were ignored. Harm to a Protected Landscape: The scheme borders the Cotswolds National Landscape (an Area of Outstanding Natural Beauty). Large parts of it are in the "*setting*" of this protected area. Industrial solar panels will damage the views, character, and tranquillity that the designation is meant to protect. Surrounding Villages: For residents in places like Norton, the scheme will mean being almost surrounded by solar development, turning their rural setting into an "*industrialised energy-generating landscape*."	National Policy Statement EN-3 Paras 2.10.11 and 2.10.18 explain that the availability of grid connection, suitable irradiance levels, and local topography are key inputs to the selection of sites suitable for large-scale solar generation developments. The number of locations within the UK at which large-scale solar generation is suitable is therefore likely to be limited, and this is a material issue when considering how the UK is to meet the urgent need for low carbon generation as is set out in the NPSs. This point is expanded upon in the **Statement of Need [APP-266]** in particular in Section 4.3. Chapter 8 of the **Statement of Need [APP-266]** provides evidence to support the suitability of the proposed location of the Scheme for large-scale solar plus storage in relation to the timeliness and availability of the grid connection, transmission system operability and the decarbonisation and energy security benefits the Scheme will bring forward from this location. As set out in **ES Volume 1, Chapter 4 Alternatives and Design Evolution [APP-056]** and the Site Selection Assessment Report at **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]** an appraisal of alternative sites within a 20km radius of the Existing National Grid Melksham Substation has been undertaken, which concludes that there are no more suitable locations within the 20km search area than the proposed location for the Scheme. The Cotswolds National Landscape (CNL) is fully assessed as a standalone receptor within **ES Volume 3, Appendix 8.6: Assessment of Effects on the Cotswolds National Landscape and its Special Qualities [APP-197]**. This assessment considers the effects of the Scheme on landscape character, visual amenity and the special qualities of the CNL including tranquillity. It is recognised that Sites A, B and C are within the settting of the CNL because of its proximity and visual relationship. In respect of visual amenity, some short-term

Reference	Theme	Comments/Issues Raised	Applicant's Response
			adverse effects would be experienced by a small number of visual receptors with views to and from the CNL. However, these would reduce over time as a result of the proposed mitigation. The assessment found that there would be some short term harm to landscape character within the setting of the CNL but due to the avoidance measures embedded within the Scheme, harm to the CNL itself would be minimal with beneficial effects in the long term which would further the purposes of the designation. The assessment of effects on the special qualities of the CNL scoped out 3 SQs as there is no association with the Site. The assessment found that there are no direct effects on the remaining SQs. There are some Minor/ Negligible short-term effects on a small number of visual receptors within the setting of the CNL which effect SQ7 -Tranquillity and SQ13 Archaeology and historic associations. However, these effects are mitigated by Year 15 when proposed vegetation has matured. The assessment also found that there would be beneficial effects on SQ 6 – Biodiversity and nature recovery as a result of the delivery of approximately 119.7 hectares of flower-rich neutral grassland (as defined in the BNG assessment) and SQ 12 - An accessible landscape as a result of the delivery of approximately 12.8km of new permissive paths within the setting of the CNL. The remaining SQs would remain entirely intact. The Scheme was refined through an iterative design process to avoid and reduce effects on the CNL and its setting. Panels along the edge of the CNL were removed from the Order Limits in fields C2, C3 and C4 where significant visual effects on receptors within the CNL were identified. Panels were also removed from fields C1, C6, C8, the western section of C9 and the majority of C10, with this land now proposed for ecological mitigation to protect the setting of the CNL. In addition, panels within fields A11 and A12 were removed and the land repurposed for ecological mitigation to protect the setting of the CNL towards Sherston.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			All land parcels adjacent to the CNL are proposed to deliver habitat enhancement, informed by the CNL Management Plan and the Cotswolds National Landscape Strategy and Guidelines, to further the purposes of the designation. An assessment of landscape and visual effects is provided in the Landscape and Visual Impact Assessment (LVIA) presented in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**. The LVIA assesses effects on identified landscape and visual receptors, including residential properties and users of public rights of way, and identifies where significant effects may occur. The LVIA found no significant long term visual effects to Residential Properties as a consequence of the Scheme. **ES Volume 3, Appendix 8-3-3: Summary of Visual Effects [APP-192]** provides a summary of the visual effects on Private Receptors Mitigation measures to address landscape and visual effects are set out in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**, Figure 3-4-1 to 3-4-5.2 **Landscape and Ecology Mitigation Plan [APP-084]** and detailed within the **Outline Landscape and Ecological Mitigation Plan (LEMP) [APP-283]** and the **Outline Ecological Protection and Mitigation Strategy (EPMS) [APP-284]**. These documents include proposals for new and enhanced planting, retention of existing hedgerows and woodland, and landscape integration measures to reduce visual effects over time. In addition, the Scheme design incorporates minimum offsets from existing landscape features, including residential properties, ancient woodland, woodland, hedgerows, public rights of way and watercourses, to further limit visual impacts. The preparation, approval and implementation of the detailed

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Landscape and Ecological Management Plan, substantially in accordance with the **OLEMP [APP-283]**, are secured through Requirement 7 in Schedule 2 of the **Draft Development Consent Order [APP-016]**. The preparation, approval and implementation of the detailed Ecological Protection and Mitigation Strategy, substantially in accordance with the **Outline EPMS [APP-284]**, are secured through Requirement 8 in Schedule 2 of the **Draft Development Consent Order [APP-016]**. These requirements ensure that the identified mitigation and enhancement measures are delivered and maintained throughout the lifetime of the Scheme.
IB-002	Landscape and Visual	Major Impact on the Countryside Understated Harm: The applicant's own assessment admits significant visual harm for 15 years, but claims it gets better after that. Objectors argue the harm will be worse and longer-lasting because: They underestimate how sensitive the landscape is. They over-rely on new tree planting to screen views, which is unreliable (trees die, get felled) and itself changes the historic character of the area with its open views and low hedges. The visual simulations are misleading-"they don't show the worst-case (winter), don't show the view from footpaths crossing the site, and don't show the effects of glint and glare from the panels.	The Applicant notes that matters relating to landscape and visual impact have been addressed in the Applicant's responses to this Relevant Representation above. The landscape and visual effects of the Scheme, including the effectiveness and phasing of proposed screening and planting, are assessed in the Landscape and Visual Impact Assessment (LVIA) presented in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**. The **LVIA [APP-060]** considers landscape and visual effects over time, including during the early years of the Scheme before planting is fully established, and identifies where significant effects may occur. NPS EN-1 recognises at para 5.10.5 that "*Virtually all nationally significant energy infrastructure projects will have adverse effects on the landscape, but there may also be beneficial landscape character impacts arising from mitigation*." Mitigation measures are detailed in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**, Figure 3-4-1 to 3-4-5.2 **Landscape and Ecology Mitigation Plan [APP-084]** and the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]**. Proposed planting comprises a mix of native species designed to enhance biodiversity and resilience, with planting design prioritising long-term effectiveness and

Reference	Theme	Comments/Issues Raised	Applicant's Response
			landscape integration. The **OLEMP [APP-283]** sets out the approach to establishment, maintenance and management of planting to ensure its effectiveness over the lifetime of the Scheme. The LVIA includes verified viewpoints with both summer and winter photography to demonstrate year-round changes to the landscape. Photomontages at Year 15 illustrate the effectiveness of established planting, while also demonstrating the intended retention of openness across the receiving landscape. Hedgerows on the western edge of fields within Lime Down C, which border the Cotswolds National Landscape, are proposed to be maintained at approximately 1.5 metres (or as existing if greater) to retain open views within the setting of the Cotswolds National Landscape. This management approach is set out in the **OLEMP [APP-283]**. The photomontages in APP-103-105 for selected viewpoints agreed with Wiltshire Council show the proposals at Year 1 in winter which represents the worst-case scenario in terms of screening and Year 5 Summer which represents the best-case scenario. The photomontages are representative of the landscape and visual changes in the landscape and not glint and glare. The preparation, approval and implementation of the detailed Landscape and Ecological Management Plan, substantially in accordance with the **OLEMP [APP-283]**, are secured through Requirement 7 in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that mitigation planting and screening measures are delivered and maintained throughout the lifetime of the Scheme.

6.20 Alexander Frost

Table 6-20 RR-0098

Reference	Theme	Comments/Issues Raised	Applicant's Response
AF-001	Climate Change and Energy Need	I strongly object to the Lime Down proposal. We have yet to see genuinely independent evidence of material net carbon savings for the Lime Down proposal. I read Wilts County Council's Climate Team's calculation that carbon neutrality will not be achieved until 2076. Indeed will even carbon neutral impact may never be reached? The IGP team never offered me any assurances here when directly questioned.	It is not clear how the 2076 year of offset conclusion has been reached. **ES Volume 1, Chapter 7 Climate Change [APP-059]** demonstrates that there is an overall net saving as a result of the scheme on GHG emissions compared to a without scheme scenario. As the Scheme will require replacement of components, and will generate some minimal emissions during operation, it is not considered that a 'break-even' date is a useful measure of the Scheme's beneficial effect. However, as the GHG electricity generation intensity figure for the Scheme is anticipated to sit continually below the forecast grid average for 2029, GHG emissions savings are expected to be achieved throughout the lifetime of the Scheme compared to a generation scenario in the absence of the Scheme. Therefore, the GHG emissions during construction, operation, and decommissioning of the Scheme can be considered to be 'offset' by the net positive impact of the Scheme on GHG emissions and the UK's ability to meet its carbon targets. The **ES [APP-052 to APP-265]** and environmental and ecological surveys have been undertaken by competent experts with considerable experience assessing similar schemes. Details of qualifications, experience and professional institute membership are provided within **ES Volume 3, Appendix 1-1 Statement of Competence [APP-180]**.
AF-002	Description and DCO Process	Note they are reported to have paid £9.2m in a process of research across the project that has been very selective in the evidence they have drawn. This is held to massive inconsistencies with other reports produced with genuine neutrality such as that of Wiltshire County Council.	The **ES [APP-052 to APP-265]** and environmental and ecological surveys have been undertaken by competent experts with considerable experience assessing similar schemes. Details are provided within **ES Volume 3, Appendix 1-1 Statement of Competence [APP-180]**. The assessments contained in the ES are appropriately detailed and robust. The Applicant stands by the conclusions contained in these assessments and supporting documents.

Reference	Theme	Comments/Issues Raised	Applicant's Response
AF-003	Description and DCO Process Site selection and Alternatives	In terms of alternative sites across Wiltshire, (Redacted) have been very clear they can only make big money on cheaply acquired land from troubled farmers. This has nothing to do with this being the most appropriate site. Please consider the endless studies which aren't being considered here such at UKWA's Walking on Sunshine - "*Just five percent of warehouses in the UK have solar panels on the roof. That means there is at least 18,500 acres of untapped potential*.' Why are reports like Walking on Sunshine (UKWA) which highlight far more appropriate sites for solar being ignored?	In relation to suggestions that brownfield land or alternative locations should be used, including rooftop, these matters are addressed in **ES Volume 1, Chapter 4 Alternatives and Design Evolution** and in the **Statement of Need [APP-056 and APP-266]**. The Applicant has considered alternatives, including previously developed land and other forms of solar deployment, as part of the site selection and design evolution process. In terms of site selection, the Applicant followed a staged approach to assessment, taking into consideration a range of planning, environmental and operational factors. **ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP-056]** and **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]** explains the methodology that has been applied when identifying and evaluating potential sites for the Scheme. It identifies a number of potential development areas for the Scheme and presents how each of those areas perform against a range of planning, environmental and operational constraints and opportunities. This report concludes that there are no more suitable and available locations within the search area than the proposed location for the Scheme, based on the criteria identified. National policy and government guidance, as set out in the **Statement of Need [APP-266]**, recognise that while rooftop and smaller-scale solar installations are an important part of the energy mix, they cannot alone meet the scale of capacity required to achieve clean power and net zero objectives. Large-scale ground-mounted solar therefore remains necessary in addition to, not instead of, rooftop solar.
AF-004	Hydrology, Flood Risk and Drainage	Our farm and the surrounding area have been flooded on repeated occasions in recent years. The clay-based soil makes the area highly	The Applicant acknowledges the experience of localised flooding on roads and farmland and recognises that flooding is an existing issue within the area. Assessments in **ES Volume 1, Chapter 11 Hydrology, Flood Risk and Drainage [APP-063]**

Reference	Theme	Comments/Issues Raised	Applicant's Response
		vulnerable. The waterways can handle substantial water levels but the heightened run-off caused by the solar panels would make this a very much higher risk situation. Not least in that the run-off may well be contaminated by the solar panels. There are a number of reports to suggest that the chemicals in a degenerating panel will pollute the water supplies in a devastating way.	have been undertaken in accordance with national and local policy and guidance and conclude that the Scheme would not increase flood risk at the Site or elsewhere or give rise to significant adverse effects on flood risk receptors, including downstream communities. The assessment considers fluvial, surface water and construction-phase mechanisms and is informed by site-specific hydraulic modelling, topographic data and historic flood information. The Applicant does not agree that the Scheme would inevitably increase runoff or exacerbate flooding. National policy recognises that ground-mounted solar PV generally drains to ground and does not create significant drainage impacts where ground cover is maintained (NPS EN-3 paragraph 3.10.75). The assessment distinguishes between panelled areas, where rainfall drains to ground beneath and between panels, and hardstanding associated with supporting electrical infrastructure, where engineered and controlled drainage is provided. The existing baseline comprises intensively managed agricultural land subject to trafficking, compaction and periods of bare ground, while the Scheme introduces permanent grass cover and reduced trafficking, improving infiltration capacity relative to baseline conditions. Scheme-specific drainage controls are secured through Requirement 11 of the **Draft Development Consent Order [APP-016].** In relation to private boreholes and groundwater resources, the Applicant does not agree that construction vibration or operation would pose a catastrophic risk to water supply. Groundwater receptors, pollution pathways and abstraction sensitivities are assessed through the hydrology and ground conditions assessments, with mitigation secured to avoid significant adverse effects on controlled waters. Construction-phase pollution prevention, incident response and emergency planning measures are secured through the construction management

Reference	Theme	Comments/Issues Raised	Applicant's Response
			framework, and firefighting water collection and containment for BESS is addressed through the battery safety and drainage controls. **Outline Construction Environmental Management Plan [APP-277]**. The Applicant does not agree that the Scheme would inevitably increase runoff or exacerbate flooding. National policy recognises that ground-mounted solar PV generally drains to ground and does not create significant drainage impacts where ground cover is maintained (NPS EN-3 paragraph 3.10.75). The assessment distinguishes between panelled areas, where rainfall drains to ground beneath and between panels, and hardstanding associated with supporting electrical infrastructure, where engineered and controlled drainage is provided. The existing baseline comprises intensively managed agricultural land subject to trafficking, compaction and periods of bare ground, while the Scheme introduces permanent grass cover and reduced trafficking, improving infiltration capacity relative to baseline conditions. Scheme-specific drainage controls are secured through the DCO discharge process. **Draft Development Consent Order [APP-016]**.
AF-005	Other Environmental Matters	The Battery Energy Storage System introduces the danger of toxic gas emissions and fires, which are notoriously difficult to extinguish. Such incidents have already caused multiday evacuations elsewhere. We would be just 1 mile away from the BESS and would fear for our lives if another fire was to occur. I'm sure the trainline that borders the proposed site would also be one that GWR might fear posses a high-risk situation. At times like these you start to think of	The Battery Energy Storage System (BESS) containers proposed for the Scheme will incorporate built-in safety features for fire avoidance, detection and suppression. The Scheme layout also incorporates separation distances between battery containers to ensure that any isolated fire would not become widespread or lead to a major incident. As shown on **ES Volume 2, Figure 3-1: Indicative Site Layout Plan [APP-081]**, the battery containers will be located more than 200 metres from the nearest Public Right of Way and more than 500 metres from any residential receptors. The Applicant notes that the approach to BESS safety is being discussed with Dorset and Wiltshire Fire and Rescue Service (D&WFRS) and is set out in the relevant **Statement of**

Reference	Theme	Comments/Issues Raised	Applicant's Response
		the lack of risk assessment in Grenfell Tower as reference points.	**Common Ground** to be submitted at Deadline 1. An **Outline Battery Safety Management Plan (OBSMP) [APP-286]** has been prepared for the Scheme using guidance from Dorset and Wiltshire Fire and Rescue Service and incorporating recommendations of the National Fire Chiefs Council. The OBSMP ensures that risks associated with battery storage are appropriately mitigated. Section 6.1.1 of the OBSMP confirms that at the detailed design stage, the selected BESS will have undertaken Large Scale Fire Testing (LSFT) to fully inform inputs for risk assessment tools which will be utilised together with detailed consequence modelling to provide a comprehensive site operations and emergency response safety audit. LSFT is a mandatory requirement under NFPA 855 (2026) safety standards to demonstrate thermal insulation protection capabilities of the BESS enclosure design, validate minimum equipment spacing distances, and demonstrate that deflagrations do not occur and/or can be safely constrained. As set out in **Outline Battery Safety Management Plan (OBSMP) [APP-286]**, the BESS Area will have a robust and validated Emergency Response Plan (ERP), developed in consultation with Dorset & Wiltshire Fire and Rescue Service at the detailed design stage. Section 5.4 of the OBSMP specifies the typical emergency response protocols, procedures and safety information that will be included in the ERP. The ERP will apply to all stages of the Scheme, including construction, operation and decommissioning. Potential effects of toxic gases arising from a BESS fire are assessed in **ES Volume 1, Chapter 15: Air Quality [APP-067]** and in **ES Volume 1, Chapter 20: Other Environmental Matters [APP-072]**, Section 20.7: Major Accidents and

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Disasters. An assessment of how these fumes could affect sensitive receptors within a 1 km radius of the BESS Area, including residential properties and ecological receptors, is provided in **ES Volume 1, Chapter 15: Air Quality [APP-067]**. This assessment concludes that no significant off-site impacts are predicted should a fire event occur. In the unlikely event of a fire, the precautionary measures set out in the **Outline Battery Safety Management Plan (OBSMP) [APP-286]** — including advice to remain indoors and close windows — would further reduce potential impacts to residents. The **OBSMP [APP-286]** is secured through Requirement 6 (Battery safety management) in Schedule 2 of the **Draft DCO [APP-016]**, which provides that Work No. 2 (relating to the construction of the BESS) must not commence until a Battery Safety Management Plan has been submitted to and approved by the relevant planning authority. The approved plan must be substantially in accordance with the Outline Battery Safety Management Plan. The Draft DCO also requires the relevant planning authority to consult with Dorset and Wiltshire Fire and Rescue Service and the Environment Agency before determining the application, and that the Battery Safety Management Plan must be implemented as approved. The Applicant is confident that the assessment and proposed mitigation and safety measures set out above are appropriate, proportionate and robust.
AF-006	Transport and Access	We have 4 children we get to school from our house situated outside Sherston and are dependent on the road networks. Given the construction stage will last up to two years and will bring more than 20,000 articulated lorries, HGVs and vans transporting materials to site creating noise and	Construction vehicle movements will be managed through a Construction Traffic Management Plan. An **Outline Construction Traffic Management Plan (CTMP) [APP-287]** has been prepared and submitted with the DCO application. The aim of the CTMP is to ensure that the effect of the construction phase on the local highway network is minimised. The **Outline CTMP [APP-287]** sets out measures to coordinate

Reference	Theme	Comments/Issues Raised	Applicant's Response
		pollution, and endangering pedestrians, cyclists and horse riders it will make it almost impossible to lead ordinary lives.	construction deliveries by HGVs to arrive and depart between 09:30 and 16:30 where possible, to avoid peak network hours of 08:00–09:00 and 17:00–18:00. It also includes a community liaison element to keep local communities informed about the construction process and to provide a contact for feedback should any issues arise. Compliance with the CTMP will be monitored by the Developer, Contractor and Wiltshire Council as local highway authority. The preparation, approval and implementation of the final CTMP, substantially in accordance with the outline CTMP, are secured through Requirement 15 of Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring construction traffic impacts are appropriately managed throughout the construction phase of the Scheme. The potential effects of construction traffic on the local highway network are assessed in **ES Volume 1, Chapter 13: Transport and Access [APP-065]**, which considers construction vehicle movements, traffic volumes, road safety and effects on road users. This included the capacity of local roads and infrastructure to accommodate construction vehicles with consideration of construction traffic volumes, vehicle types, route suitability, and network performance. The assessment concludes that the level of construction traffic associated with the Scheme is unlikely to materially affect road safety on links within the Study Area, and no significant adverse effects on accident risk are anticipated. The assessment additionally concludes that with appropriate mitigation such as the CTMP in place, there would be no significant adverse impacts on the local highway network during the construction, operation and maintenance, and decommissioning phases of the Scheme.

Reference	Theme	Comments/Issues Raised	Applicant's Response
AF-007	Cultural Heritage	We moved to Sherston in 2018 and have endeavoured to treasure and protect the local heritage in what is a popular tourist location. We have reopened and maintained footpaths along the historical Fosse Way for local people to enjoy, and all this will be destroyed by a foreign corporate monetising the area and turning it into industrial wasteland.	The Applicant has provided a robust assessment of impacts to tourism and recreation in **ES Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]**, while impacts to the social environment, on amenity, and access to the countryside for leisure have been assessed in **ES Chapter 18: Human Health [APP-070]**, with reliance on **ES Chapter 8: Landscape and Visual [APP-060]**. The Applicant confirms that the majority of significant adverse effects can be mitigated, however, the assessment identifies residual significant adverse effects to a small number of PROWs and unsurfaced highways during construction, and to long-distance recreation routes during all phases of the Scheme (due to their regional or national importance). The assessment of human health impacts identifies no residual significant adverse effects from the Scheme. The assessment in **ES Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** and the supporting **ES Volume 3 Appendix 16-2 Tourism and Recreation Receptor Tables [APP-241]** have assessed the likely impacts of the Scheme at construction, operation, peak replacement, and decommissioning on tourism and recreation receptors, including all PROWs within 2 km of the Scheme. Assessment of the likely impact on the Cotswolds National Landscape (given Sherston's location at the NL edge) has been considered separately as both a landscape and visual impact in **ES Chapter 8: Landscape and Visual [APP-060]**, and as a tourism destination in in **ES Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]**. The assessment in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** concludes that there is no residual significant adverse effect to the Cotswolds National Landscape as a tourism destination.
AF-008	Human Health	This raises the ugly spectre of mental health. Macquarie themselves have	Consultation with Wiltshire Council's Public Health Team has informed the approach to mental health considerations, as

Reference	Theme	Comments/Issues Raised	Applicant's Response
		reportedly refused to fund support for the mental health issues this process is creating. Meanwhile, local residents are being forced to raise their own funds to secure basic legal representation -" an extraordinary situation when people are facing threats of compulsory purchase orders. Many simply do not have the resources to respond fairly or independently. We have reports that mental health issues have risen sharply in the past 18 months across the area. Why has there been so little acknowledgement of mental health issues by IGP and specifically declining to set aside funds for the impacts here?	documented in **ES Volume 3, Appendix 18-1: Human Health Consultation [APP-244].** Through this engagement, the Applicant has committed to signposting locally available mental health and wellbeing resources to members of the public engaging with the Scheme, using information provided by Wiltshire Council's Public Health Team. The Applicant will continue to monitor consultation responses relating to mental health and will provide appropriate signposting to existing local support services where requested. The Applicant notes that the assessment methodology for health and wellbeing has been agreed with Wiltshire Council's Public Health team and is set out in the Statement of Common Ground with Wiltshire Council to be submitted at Deadline 1. The Applicant notes the relevant representation made by The UK Health Security Agency (UKHSA) **[RR-4798]**. This confirms that they acknowledge that the Environmental Statement (ES) has not identified any issues which could significantly affect public health and that the Scheme should not result in any significant adverse impact on public health. This follows previous engagements between the Applicant and both the UKHSA itself (written correspondence only) and the supporting Office for Health Improvements and Disparities (written correspondence and a meeting) during statutory consultation,
AF-009	Soils and Agriculture	We rely on local food production for ourselves and our livestock. The farmland planned for development is 30% best quality farm land (BMV). All feed for our horses comes locally. Losing such land will worsen our reliance on imports at a time when resilience is critical.	The potential effects of the Scheme on agricultural land are assessed in **ES Volume 1, Chapter 17 Soils and Agriculture [APP-069]**, which considers baseline agricultural land use and quality and evaluates likely effects during construction, operation and decommissioning. As detailed in **Volume 1, Chapter 17 Soils and Agriculture [APP-069]**, and **Volume 3, Appendix 17-1: Agricultural Land Classification and Soil Survey Report [APP-243],** a majority (around two-thirds) of the site area is non-BMV in Subgrade 3b

Reference	Theme	Comments/Issues Raised	Applicant's Response
			and Grade 4, which is not considered high quality in planning terms. Around 29% of the agricultural land is classified as Subgrade 3a quality, which is the lowest of the BMV grades. Around 4% of the agricultural land is high quality Grade 2. Agricultural land quality has been considered in **ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP 056**]. **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP 185]** details how the Applicant initially sought to avoid use of BMV agricultural land, only considering Grade 3 and above from Stage 5 of the selection process. Although the primary agricultural use of the land will be temporarily lost, all other ecological functions of the land will continue. There is not anticipated to be any permanent loss of agricultural land. The Applicant does not consider that food security will be compromised by the Scheme (or solar energy more widely). The latest figures to September 2024 indicate that solar occupied around 21,200 ha of agricultural land in the UK. In 2025, 545,000 ha of arable land in England were left uncropped (source: Department for Environment, Food & Rural Affairs, Agricultural land use in England at 1 June 2025). It should also be noted that food security is not identified as an issue within the suite of Energy National Policy Statements or the National Planning Policy Framework (NPPF). Further, the Government's UK Solar Roadmap (2025) states that solar development is not considered to compromise food security, but that the climate and nature crisis poses the greatest long-term risk to food security- a risk which the Scheme directly helps to address by providing a secure, low-carbon source of electricity.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			As set out in Section 2 of the **Outline Decommissioning Strategy [APP-279],** post-decommissioning of the Scheme, the landowners would choose how the land is to be used and managed. The landowner may return all of the land to arable use, although it is likely that established habitats such as hedgerows and woodland would be retained given their potential benefits to agricultural land and the wider farming estate.
AF-010	Description and DCO Process Consultation and Engagement	I hope you will explore the due process of the consultation which has to date been a liturgy of concerning malpractice for local people. The implication is IGP/Macquarie will stop at nothing to drive revenues for the MGREF2 fund. Some examples include: Paying locals to be silent: (Redacted)	The Applicant confirms that consultation for the Scheme has been conducted in strict accordance with the Planning Act 2008 and is documented in the **Consultation Report [APP-022]**. The adequacy of the Applicant's conduct and the consultation process has been reviewed and accepted by the Planning Inspectorate as part of the application procedure. The Applicant implemented a multi-phased approach, including a non-statutory Stage One consultation (March–April 2024) and a statutory Stage Two consultation (January–March 2025), followed by a supplementary phase of targeted Consultation (June - July 2025) to ensure the design was influenced by local knowledge from an early stage and throughout the pre-application stage. The Applicant's approach exceeded statutory requirements by providing a 49-day response period for Stage Two, reaching over 14,000 local properties via direct mail, and holding eight in-person community information events and two online webinars. Detailed evidence of how the Applicant has had regard to feedback received during these phases is presented in the **Consultation Report Appendices [APP-023 to APP-051]**, including responses to specific community concerns regarding the design and location of infrastructure. Regarding concerns over developer motivation and accountability, the **Funding Statement [APP-**

Reference	Theme	Comments/Issues Raised	Applicant's Response
			019] demonstrates that the Scheme is financially viable and adequately funded to be delivered in full as a privately financed development. The Applicant acknowledges the expressions of distrust in this representation, but confirms that all negotiations with identified land interests are conducted within established frameworks to ensure fairness and legal compliance.
AF-011	Description and DCO Process	Legal representation of locals being withdrawn after (Redacted) from developers. Please enquire with the SRA to find out details as to how (Redacted) reportedly (Redacted) our lawyers (Redacted) to the point they withdrew from representing us only two months into the process. (Redacted) the individual who was handling our case reported that (Redacted) had (Redacted) to take business away from (Redacted) if they continued to represent local people challenging the proposal.	The Applicant confirms that it had no involvement with the appointment or cessation of any legal representation in relation to the Scheme, other than the appointment of the Applicant's own legal counsel. The Applicant took proactive steps to address these specific allegations when they first arose, providing written confirmation to the Stop Lime Down (SLD) group in May 2024 that the Applicant had played no part in any legal representative's decision to withdraw. At that time, the Applicant further offered to provide a formal letter to SLD's appointed counsel to explicitly confirm that no conflict of interest existed with the Applicant or their own legal team, though no request for this was received. The Applicant notes that this position has since been re-confirmed in writing to the author of this representation.
AF-012	Description and DCO Process Consultation and Engagement	I would also highlight the highly inappropriate ways in which (Redacted) are using their CPO powers. These have terrified local residents and forced a number of people into panicked decisions. On 9th May 2024 we held a meeting at Ladyswood Stud with the then IGP management team. In a recorded conversation they admitted the process to that point had been poorly handled and a major restoration of confidence in their due process was required claiming they had	The Applicant remains committed to meaningful engagement with all land interests and confirms that negotiations are tracked in the **Land and Rights Negotiations Tracker [APP-021]**. The Applicant acknowledges that the meeting on 9 May 2024 with representatives from Stop Lime Down (SLD) and the developer's project and management team provided a constructive environment for engagement and allowed for the discussion regarding a restoration of confidence during the non-statutory phase of the Scheme. This dialogue continued through subsequent meetings in February 2025 between the Applicant and (SLD), which were beneficial in shaping the Scheme's development and are documented as part of the iterative design process in the **Consultation Report [APP-022]**.

Reference	Theme	Comments/Issues Raised	Applicant's Response
		'underestimated the sale of the situation'. The management team were then replaced. (Redacted) is one of few remaining, but has since refused to directly engage with myself despite repeated requests.	Following a restructuring of the business, the Applicant confirms that while one senior leader and one project-level employee have since departed, the core project development team has remained in place, alongside consistent members of the environmental, planning and legal teams. This continuity has ensured that the technical expertise and commitments made during early engagement are carried through the Examination and into the delivery of the Scheme. The Applicant confirms that consultation & engagement for the Scheme has been conducted in strict accordance with the Planning Act 2008 and is documented in the **Consultation Report [APP-022]** and remains committed to its engagement strategy. The Applicant welcomes the opportunity to discuss potential impacts on local businesses, with ongoing dialogue being facilitated through a Community Liaison Group (CLG), which is intended to provide a formal channel for community representatives to monitor and influence the construction, operational, and decommissioning aspects of the Scheme, should it be consented.
AF-013	Construction and Decommissioning	There are so many unanswered questions - who pays for the clear-up after a company who has zero track record of ever managing a site such as this leaves after the life-cycle of the project?	At the end of the Scheme's operational life, all Solar PV Sites would be decommissioned and the land restored to its original use and condition as far as practicable. The Applicant expects that most of the solar equipment, including panels, cabling, inverters, BESS and substations, to be recycled and disposed of, in line with industry practice. The Applicant expects there to be even greater opportunities for recycling at the end of the Scheme's design life. There will be opportunities for the retention of a range of biodiversity improvements, including established habitats, hedgerows and woodland, beyond the decommissioning of the Scheme, ultimately enhancing the ecological value of the area.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			A requirement to decommission the Scheme is part of the DCO application; failing to comply with that requirement would be a criminal offence. Decommissioning is also covered in agreements with landowners, which includes decommissioning securities to cover the cost of decommissioning in the event of any breach by the Applicant or in the event of the insolvency of the Applicant. The amount of such decommissioning security is regularly re-valued throughout the lifecycle of the Scheme and topped up if necessary to ensure the Scheme can be decommissioned and the land restored back to its existing use. Decommissioning is secured through Requirement 20 in Schedule 2 of the **Draft Development Consent Order [APP-016]**. The Applicant has produced an **Outline Decommissioning Strategy [APP-279]** which was submitted with the DCO Application. A final decommissioning plan will be prepared and agreed with the relevant authorities at that time of decommissioning and will include detailed measures and timescales. As set out in the **Funding Statement [APP-019]** submitted with the DCO Application, the Applicant is committed to ensuring that appropriate financial provisions are in place to cover decommissioning costs at the end of the operational life of the Scheme.
AF-014	Description and DCO Process	Are (Redacted) here merely because the MGREF2 fund they are using that was set up for a global investment mandate now has so few options as Italy, France, Germany, Australia (ironically!) wake up to the devastating impacts of large-scale solar projects on inappropriate sites?	As set out in the **Funding Statement [APP-019]**, the Scheme is a privately financed development, which is the standard model for delivering large-scale energy infrastructure in Great Britain. This model enables the development of essential low-carbon infrastructure without reliance on public funds. The Applicant notes that the siting of renewable energy projects is governed by specific national policy frameworks. While certain restrictions were proposed in Italy in 2024 for example, these have been subject to subsequent legal challenge and partial invalidation. To restrict ground-mounted solar in the UK

Reference	Theme	Comments/Issues Raised	Applicant's Response
			in a similar manner would contradict current National Policy Statements (NPS EN-1 and EN-3), which identify such projects as Critical National Priority infrastructure essential for achieving net zero and energy security. The Applicant's approach to site selection has focused on balancing the urgent national need for low-carbon generation whilst minimising impacts to the local environment by ensuring that the Scheme avoids the most sensitive designations. Full details of this methodology and the evaluation of potential alternative locations are provided in **ES Volume 1, Chapter 4 Alternatives and Design Evolution [APP-056]** and the Site Selection Assessment Report at **ES Volume 3, Appendix 4-1 [APP-185**]. These site selection parameters and the resulting design refinements are documented in the **Consultation Report [APP-022]** and are legally secured through the Requirements in Schedule 2 of the **Draft DCO [APP-016]**.
AF-015	Description and DCO Process Socio-Economics, Tourism and Recreation	Why are (Redacted) powers being used so inappropriately? Without a regulator who will protect local people in the development stage of the project by a company who have never done anything on this scale before? Who will pay for their legal representation? Who will compensate them for the devastating impact on house prices as the area turns into an industrial site during construction phase?	The Applicant's goal is to deliver Lime Down Solar Park on land where the owner has voluntarily agreed to its use. Meaningful conversations with identified land interests have helped inform the design which in turn assists in avoiding certain elements of land holdings, including homes or gardens. Lime Down Solar Park is defined as a Nationally Significant Infrastructure Project (NSIP) under the Planning Act 2008, and the **Draft Development Consent Order [APP-016]** contains provisions for the compulsory acquisition of land, property and rights. These rights are sought to ensure the ability to deliver the Scheme and are subject to strict controls and limitations that will be thoroughly tested throughout the examination process by the Examining Authority to ensure that they are both proportionate and necessary. The Applicant remains committed to meaningful engagement with all land interests and confirms that negotiations, including the provision of legal fees for affected parties, are tracked in the

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Land and Rights Negotiations Tracker [APP-021]. Impacts of the Scheme on property prices have not been assessed as these have been agreed by the Planning Inspectorate to be scoped out of assessment in the ES, as set out in **ES Volume 3, Appendix 1-2 Scoping Opinion Response Table [APP-181]**. The Applicant has a proven track record in developing projects of this scale, including the consented Cottom Solar Project and West Burton Solar Project, alongside a number of other NSIP scale schemes currently being progressed by Island Green Power.
AF-016	Description and DCO Process	What deal did (Redacted) do with the UK government to give them such a strong hand in these situations? (Redacted)	The Applicant confirms that it has not entered into any private 'deal' or arrangement with the UK Government regarding the Scheme, nor received any subsidies in the Scheme's development. The Scheme is a privately financed development, which is the standard model for delivering large-scale energy infrastructure in Great Britain; this model enables the development of essential low-carbon generation without reliance on public funds. The Scheme's designation as Critical National Priority (CNP) infrastructure is a status defined within the National Policy Statement for Energy (EN-1). This classification is not derived from any private arrangement but is instead a direct response to the urgent national need for renewable energy to bolster UK energy security and meet net zero targets, as established in government policy.
AF-017	Description and DCO Process	I hope this analysis will form part of your due process. I am a passionately believer in green energy and conserving the environment. This proposal however simply has none of	The Applicant notes that the concerns raised by this Interested Party have been responded to in detail in the responses above.

Reference	Theme	Comments/Issues Raised	Applicant's Response
		these priorities in mind, and its impact has already been devastating.	
AF-018	Description and DCO Process	IGP/Macquarie have openly admitted that have made plenty of mistakes in the due process to date, but there are no repercussions and local people are being quashed. The track record of (Redacted) in these situations has typically been one of financial (Redacted) with scant regard for their implications. We have yet to witness anything that suggests Lime Down is any different, indeed all evidence to date suggests this is a more extreme version of their track record of malpractice (Redacted), and why they have been long afforded the seemingly highly appropriate but distasteful name, the Vampire Kangaroo.	The adequacy and transparency of the Applicant's approach during the pre-application stage is set out in the **Consultation Report [APP-022].** This document evidences compliance with the statutory requirements of the Planning Act 2008 and records a multi-stage engagement process through which local knowledge informed the evolution of the Scheme. That process led to material design refinements, including measures to protect residential amenity and landscape character. The Applicant will remain subject to ongoing legal obligations secured through the Requirements contained within Schedule 2 of the **Draft DCO [APP-016]**. These Requirements are enforceable by the Secretary of State throughout the operational life of the Scheme. Any failure to comply would constitute a criminal offence, providing a clear and robust mechanism to ensure continued adherence to environmental and community commitments. As set out in the **Funding Statement [APP-019]**, the Scheme is a privately financed development, which is the standard model for delivering large-scale energy infrastructure in Great Britain. This model enables the development of essential low-carbon infrastructure without reliance on public funds. The Applicant does not seek to override local interests but operates within a transparent and regulated planning framework. The Scheme's designation as Critical National Priority infrastructure is derived from national policy set out in NPS EN-1, reflecting the urgent need for energy security and low-carbon generation, rather than any private arrangement. The Applicant evidences the experience Island Green Power (IGP) holds in developing projects of this scale, demonstrated through the consent of Cottom Solar Project and West Burton

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Solar Project. These projects were progressed in full accordance with all relevant regulatory and procedural requirements. In addition, IGP is currently advancing several other NSIP scale developments through the DCO process.
AF-019	Socio-Economics, Tourism and Recreation	We would very probably be forced to close down our stud business which employs 5 people directly and contributes £300,000/year to the local economy in veterinary bills, feed, staff wages and other contributions. The financial contribution to the broader economy in stallion fees, insurance and bloodstock production is materially more with the UK's racing industry employing 85,000 people. In 2018 we were a top 10 consignor of foals at Tattersalls and have maintained a strong position within the industry ever since with 45 horses now on the farm. Please consider a number of studies including "*Large Scale Infrastructure Projects and Their Impacts on Studfarms*" by W.M. Bayly, D.R. Hodgson, and D.P. Leadon. Here independent veterinary and scientific evidence shows that industrial-scale solar and wind developments cause serious welfare risks to horses, especially pregnant mares and foals. The report is detailed and cites a broad section of other studies that are backed up by long-standing evidence. Extracts include citing issues such as: "*Severe noise anxiety is reported to*	The equestrian facilities at Ladyswood Farm & Stud have been assessed as a specific receptor in **ES Volume 3 Appendix 16-2 Tourism and Recreation Receptor Tables [APP-241]**. During construction, a medium-term temporary moderate-minor adverse effect is anticipated, as a result of proximity to Solar PV Arrays, a construction compound, cabling works, and HGV traffic on access and hacking routes. The Applicant has sought to mitigate these as much as possible through removing Solar PV Array areas (fields designated B2-B4 and A11-A12), and embedding design, transport, and PROW mitigation into the Scheme ahead of DCO submission. This has included providing landscape screening around Solar PV infrastructure, siting the construction compound in B1 as far as practicable from the paddocks at Ladyswood Farm & Stud, providing banksmen and speed limits where accesses interact with PROWs, through specifying HGV access routes to the Scheme, and through ensuring PROWs are kept open as much as practicable through construction, and entirely during the operational phase of the Scheme. These measures are secured through the **Works Plan [APP-007]**, **Outline LEMP [APP-283]**, **Outline CEMP[APP-0277]**, **Outline CTMP [APP-287]** and **Outline PROWPPMP [APP-282]** by Requirements 5, 7, 13, 15, and 16 respectively in Schedule 2 to the **Draft DCO [APP-016]**. As a result, it is not anticipate that the effects on Ladyswood Farm & Stud are anticipated to be significant. This also applied to individually assessed PROWs around Ladyswood, which subject to implementation of mitigation are not anticipated to

Reference	Theme	Comments/Issues Raised	Applicant's Response
		cause serious welfare consequences, impacting both the physiology (e.g. gastrointestinal signs/colic, sweating) and behaviour (e.g. frantic running, collisions with and breaking fences) of the horse (Riva et al. 2022). " *"The result will inevitably be closure of studfarms, an unnecessary loss of rural employment and reduced net inward investment and reputational damage*.'	experience significant adverse effects at any phase of the Scheme.
AF-020	Landscape and Visual	The Cotswolds is one of the UK's most treasured landscapes, drawing visitors from around the world. Towering panels, industrial structures, and fencing will destroy unspoiled countryside views, replacing them with an industrial wasteland. Every morning we are privileged to wake up to remarkable view of the cherish local landscape. This will all be lost to 4.5 metre high panels - never installed in the UK at this scale. This is totally unprecedented, and its impact has never been considered, let alone tested.	The height of the solar PV panels has been assessed using clearly defined design parameters, including a maximum height of 4.5 metres above ground level at maximum tilt, as set out in **ES Volume 1, Chapter 3: The Scheme [APP-055]**. These parameters represent a realistic worst-case scenario for the purposes of the Environmental Impact Assessment. An assessment of landscape and visual effects, including the effects of the maximum panel height, is provided in the Landscape and Visual Impact Assessment (LVIA) presented in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**. The LVIA assesses effects on identified landscape and visual receptors during construction, operation and decommissioning, including residential properties and users of public rights of way, using the maximum design parameters to ensure a robust assessment, and identifies where significant effects may occur. The LVIA found no significant long term visual effects to Residential Properties as a consequence of the Scheme. Ladyswood Farm is identified as as Receptor RG017 and has been fully assessed in ES Volume 3, Appendix 8-3-2-1-1: Visual Assessment Sheets (Non-Significant) [APP 190]. In response to consultation a significant number of fields along the Fosse Way close to Ladyswood Farm were removed from the Scheme. As

Reference	Theme	Comments/Issues Raised	Applicant's Response
			a result of the removal of panels in fields B2-B5 and fields B1 and C27, there would be no change to views. The scale of development within the Order Limits has been significantly reduced from the layout assessed in the Preliminary Environmental Information Report (PEIR) through an iterative design process undertaken in response to consultation and in accordance with the mitigation hierarchy to avoid, reduce and mitigate adverse effects. As part of this design evolution, panels along the edge of the Cotswolds National Landscape and along the Fosse Way have been removed. In addition, the Scheme design incorporates minimum offsets from existing landscape features, including residential properties, ancient woodland, woodland, hedgerows, public rights of way and watercourses, to further limit visual impacts. Mitigation measures to address landscape and visual effects, including measures that reduce the perceived height and prominence of panels in views, are set out in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**, Figure 3-4-1 to 3-4-5.2 **Landscape and Ecology Mitigation Plan [APP-084]** and detailed within the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]** and the **Outline Ecological Protection and Mitigation Strategy (EPMS) [APP-284]**. These include proposals for new and enhanced planting, retention of existing hedgerows and woodland, and landscape integration measures to reduce visual effects over time. The preparation, approval and implementation of detailed landscape and ecological management plans, substantially in accordance with the **OLEMP [APP-283]** and **EPMS [APP-284]**, are secured through requirements in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that the identified mitigation measures are delivered and maintained throughout the lifetime of the Scheme.

6.21 James Turner

Table 6-21 RR-2078

Reference	Theme	Comments/Issues Raised	Applicant's Response
JT-001	Site selection and Alternatives	I think all solar farms should be located along major motorways as this is unusable land. Also lime down will become a brown site after 20 years I believe, so a stealth way of being able to build yet more houses in this area	In relation to suggestions that brownfield land or alternative locations should be used, including rooftop, these matters are addressed in **ES Volume 1, Chapter 4 Alternatives and Design Evolution** and in the **Statement of Need [APP-056 and APP-266]**. The Applicant has considered alternatives, including previously developed land and other forms of solar deployment, as part of the site selection and design evolution process. As shown in Table 2-2 of **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]**, the Applicant has considered previously developed land/brownfield land over 1 hectare within the area of search, based on the brownfield land registers of the relevant Local Planning Authorities, and concluded that none of the sites are large enough to provide a viable land parcel of at least 40 ha and sites were not considered to be available as they have planning permission for residential development and/or are allocated for residential/mixed use development. National policy and government guidance, as set out in the **Statement of Need [APP-266]**, recognise that while rooftop and smaller-scale solar installations are an important part of the energy mix, they cannot alone meet the scale of capacity required to achieve clean power and net zero objectives. Large-scale ground-mounted solar therefore remains necessary in addition to, not instead of, rooftop solar. The effects of decommissioning on soils and agricultural land are assessed in **ES Volume 1, Chapter 17 Soils and Agriculture [APP-069]**. As stated in this chapter, all land will be returned to its original use and condition as far as practicable and returned to the landowner. The effect on agricultural land quality at decommissioning would be influenced by the extent of disturbance caused by the removal of the Solar PV Panels, for example the presence and dimensions of leftover voids or the depth of the remaining underground cables. Currently, the most

Reference	Theme	Comments/Issues Raised	Applicant's Response
			environmentally acceptable option is to leave the cables in-situ, although the cables could be removed by excavating at regular intervals and pulling the cable through to the extraction point, thus avoiding the need to excavate the entire cable trench. In either case, the effects would be less than those likely to occur during the construction phase. Built aspects of the Scheme such as the BESS Area and substations are also subject to the proposal to return the land to its original use and condition, which is primarily agricultural land of Subgrade 3b quality, with some Subgrade 3a at the BESS Area. Measures to manage decommissioning and reinstatement are set out in the **Outline Decommissioning Strategy [APP-279]**, which has been submitted as part of the DCO Application. The Decommissioning Strategy will include robust methodologies and control points to avoid contamination of the underlying land with physical or chemical contaminants and will be applied in conjunction with the Soil Resources Management Plan (SRMP) in order to promote successful reinstatement. A detailed Decommissioning Plan will be prepared substantially in accordance with the **Outline Decommissioning Strategy [APP-279]** and must be submitted to and approved by the relevant local planning authority prior to the commencement of decommissioning. This is secured through Requirement 20 in Schedule 2 of the **Draft Development Consent Order [APP-016]**. In addition, the Applicant is seeking a time-limited consent for the Scheme to have an operational period of 60 years, with decommissioning to take place following cessation of operation. This is secured by Requirement 20 in Schedule 2 of the **Draft DCO [APP-016]**. The Applicant does not expect that the land will be considered brownfield after decommissioning. The expectation is that the

Reference	Theme	Comments/Issues Raised	Applicant's Response
			land will return to farming. However, the Applicant notes that it cannot dictate what will happen to the land post-decommissioning when the Applicant no longer has an interest in the land. Post-decommissioning of the Scheme, the landowners would choose how the land is to be used and managed, the landowner may return all of the land to arable use, although it is likely that established habitats such as hedgerows and woodland would be retained given their potential benefits to agricultural land and the wider farming estate.

6.22 Carter Jonas on behalf of Messer Nicholas

Table 6-22 RR-3146

Reference	Theme	Comments/Issues Raised	Applicant's Response
CJMN-001	Site selection and Alternatives	Carter Jonas acts on behalf of Messrs Nicholas in relation to the proposed Lime Down Solar Project DCO. We wish to raise the following points: Excessive Land Requirement- The acquiring authority has requested an option over 18.22 acres of our client's land, citing uncertainty regarding the location of the grid connection to the adjacent substation. This area is wholly disproportionate to the requirements for the proposed works on my clients land. The applicant has also stated in their Needs Case (Section 7.6.11): 'The land included in the Scheme's proposals will support an optimisation of the available grid connection secured at Melksham from the proposed layout and BESS configuration, while being sympathetic to planning issues and respecting identified constraints.' However, the land included within the scheme limits only supports an available grid connection, as land has been included surrounding the entire substation, rather than the minimum land that is necessary to deliver the scheme. Lack of Realistic Proposal- Due to excessive land requirements as outlined above our client has not been provided with a clear or realistic	The Applicant acknowledges that the Book of Reference does not currently list Messrs Nicholas' relevant Category 1 interest in Plot 16014 within the Lessee or Tenant section. This omission has now been identified, and the Book of Reference will be updated to include the relevant interest at Deadline 1. The Applicant acknowledges the option area is greater than the final easement width, however this is to allow flexibility around the point of connection at the substation which is governed by National Grid which is common practice for these types of projects. The Applicant is in discussions with Messer' Nicholas' and their professional representation to enable proper consideration to the final area where the Applicant seeks rights over the land. The Applicant is engaging with National Grid regarding their non-operational land where Messers' Nicholas' have occupation. As part of this, the Applicant is following the internal governance process set out by National Grid, the engagement is highlighted in the **Land Rights Negotiations Tracker [APP-021]** and confirms the Applicant has submitted the Developer Enquiry Form and is progressing through the stages. The Environmental Statement (**ES Volume 2, Appendix 3-2: Cable Route Construction Method Statement [APP-183]**) confirms that the widest cable trench is anticipated to be 7m, therefore on completion of the aforementioned process, the cable area and subsequently option area, is to be reduced accordingly. The Applicant will continue to engage with Messrs' Nicholas' and their professional representation to enable proper consideration of any voluntary agreement.

Reference	Theme	Comments/Issues Raised	Applicant's Response
		proposal. This prevents proper consideration of the offer put forward due to rights being asked for over significantly more land than is required for the proposed works on my clients land. If compulsory acquisition powers are granted, there is concern that they may not be used as a means of last resort. Omission from Book of Reference- The Book of Reference fails to list our client's Category 1 interest in Plot 16-014. The acquiring authority is aware of their interest and there agents have said "*Heads of Terms will be issued once they have been through National Grid's six-step process*", in so doing, not allowing my client to properly consider a voluntary agreement.	

6.23 Craig Lance Newton Fuller

Table 6-23 RR-0949

Reference	Theme	Comments/Issues Raised	Applicant's Response
CLNF-001	Cultural Heritage Landscape and Visual	Relevant Representation: FORCEFUL OBJECTION to Lime Down Solar and BESS NSIP Introduction: Core Position and Context 1.1 This representation articulates unwavering and forceful opposition to the Lime Down Solar and Battery Energy Storage System (BESS) Nationally Significant Infrastructure Project (NSIP). The project is considered to be fundamentally and demonstrably incompatible with Wiltshire's historic landscape and existing local infrastructure. 1.2 The context of the proposal is a historic Wiltshire setting along the Fosse Way and Wessex Way, where fields and hedgerows have been maintained for livestock for over 500 years. This area possesses an irreplaceable heritage value. 1.3 The site features long-protected views from Areas of Outstanding Natural Beauty (AONB) and national landscapes. The proposal is an unacceptable and damaging imposition, wholly out of character with this sensitive and historically significant environment.	National Policy Statement EN-3 Paras 2.10.11 and 2.10.18 explain that the availability of grid connection, suitable irradiance levels, and local topography are key inputs to the selection of sites suitable for large-scale solar generation developments. The number of locations within the UK at which large-scale solar generation is suitable is therefore likely to be limited, and this is a material issue when considering how the UK is to meet the urgent need for low carbon generation as is set out in the NPSs. This point is expanded upon in the **Statement of Need [APP-266]** in particular in Section 4.3. Chapter 8 of the **Statement of Need [APP-266]** provides evidence to support the suitability of the proposed location of the Scheme for large-scale solar plus storage in relation to the timeliness and availability of the grid connection, transmission system operability and the decarbonisation and energy security benefits the Scheme will bring forward from this location. As set out in **ES Volume 1, Chapter 4 Alternatives and Design Evolution [APP-056]** and the Site Selection Assessment Report at **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]** an appraisal of alternative sites within a 20km radius of the Existing National Grid Melksham Substation has been undertaken, which concludes that there are no more suitable locations within the 20km search area than the proposed location for the Scheme. The potential effects of the Scheme on the cultural heritage of the Fosse Way, Wessex Way and associated Roman archaeological assets are fully assessed in **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, supported by detailed technical appendices in **ES Volume 3, Appendices 12-1 to 12-7 [APP-219 to APP-231]**. The assessment identifies known Roman heritage assets, considers their significance, and evaluates likely effects during construction, operation and decommissioning, including effects on setting. Since the design presented at PEIR stage, Field C26, the westernmost part of Field C25, and the majority of Field C13 have been entirely removed from the Order Limits. Solar PV Panels have

Reference	Theme	Comments/Issues Raised	Applicant's Response
			also been removed entirely from within Fields B1-B5, C24-C25, and C13. A number of fields abutting the Fosse Way within which Solar PV Panels will be erected have had offsets established with their boundaries with Fosse Way, including Fields B6, C10-C12, and C22-C23. **Appendix 12.1: Heritage Statement [APP-219]** identified that the overall setting and significance of the Fosse Way will remain intact, and the asset will retain its legibility as a roadway within a largely agrarian landscape. Consequently, no significant effects were identified to the asset. Embedded mitigation measures to avoid or reduce harm to heritage assets are set out in Section 12.9 of **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, with additional mitigation detailed in Section 12.11. An overarching archaeological mitigation strategy is provided in **ES Volume 3, Appendix 12-6: Outline Archaeological Mitigation Strategy [APP-230]**. The Cotswolds National Landscape (CNL) is fully assessed as a standalone receptor within **ES Volume 3, Appendix 8.6: Assessment of Effects on the Cotswolds National Landscape and its Special Qualities [APP-197]**. This assessment considers the effects of the Scheme on landscape character, visual amenity and the special qualities of the CNL. The assessment found that there would be some short term harm to landscape character within the setting of the CNL but due to the avoidance measures embedded within the Scheme, harm to the CNL itself would be minimal with beneficial effects in the long term which would further the purposes of the designation. In respect of visual amenity, some short-term adverse effects would be experienced by a small number of visual receptors with views to and from the CNL. However, these would reduce over time as a result of the proposed mitigation. The assessment of effects on the special qualities of the CNL scoped out 3 SQs as there is no association with the Site. The assessment found that there are no direct effects on the remaining SQs. There are some Minor/ Negligible short-term effects on a small number of visual receptors within the setting of the CNL which effect SQ7 -Tranquillity and SQ13 Archaeology and historic associations. However, these

Reference	Theme	Comments/Issues Raised	Applicant's Response
			effects are mitigated by Year 15 when proposed vegetation has matured. The assessment also found that there would be beneficial effects on SQ 6 – Biodiversity and nature recovery as a result of the delivery of approximately 119.7 hectares of flower-rich neutral grassland (as defined in the BNG assessment) and SQ 12 - An accessible landscape as a result of the delivery of approximately 12.8km of new permissive paths within the setting of the CNL. The remaining SQs would remain entirely intact. The Scheme was refined through an iterative design process to avoid and reduce effects on the CNL and its setting. Panels along the edge of the CNL were removed from the Order Limits in fields C2, C3 and C4 where significant visual effects on receptors within the CNL were identified. Panels were also removed from fields C1, C6, C8, the western section of C9 and the majority of C10, with this land now proposed for ecological mitigation to protect the setting of the CNL. In addition, panels within fields A11 and A12 were removed and the land repurposed for ecological mitigation to protect the setting of the CNL towards Sherston. All land parcels adjacent to the CNL are proposed to deliver habitat enhancement, informed by the CNL Management Plan and the Cotswolds National Landscape Strategy and Guidelines, to further the purposes of the designation. Details of the proposed landscape and ecological mitigation and enhancement measures are provided in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**, Figure 3-4-1 to 3-4-5.2 **Landscape and Ecology Mitigation Plan [APP-084]** and the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]**, and the **Outline Ecological Protection and Mitigation Strategy (OEPMS) [APP-284]**. The preparation, approval and implementation of the detailed Landscape and Ecological Management Plan, substantially in accordance with the **OLEMP [APP-283]**, are secured through

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Requirement 7 in Schedule 2 of the **Draft Development Consent Order [APP-016]**. The preparation, approval and implementation of the detailed Ecological Protection and Mitigation Strategy, substantially in accordance with the **OEPMS [APP-284]**, are secured through Requirement 8 in Schedule 2 of the **Draft Development Consent Order [APP-016]**. These requirements ensure that the identified mitigation and enhancement measures are delivered and maintained throughout the lifetime of the Scheme.
CLNF-002	Site selection and Alternatives Landscape and Visual	Site Selection and NSIP Process Concerns 2.1 The attribution of the site choice is evidently driven solely by landowner willingness, not by technical suitability, starkly highlighted by its excessive distance from the national grid. This demonstrates a fundamental flaw in the project's conception. 2.2 Numerous brownfield alternatives, including disused power station sites nationwide with existing grid connections, are incontrovertibly more appropriate and sustainable locations for such a project compared to this pristine greenfield site. The developer has failed to justify this inappropriate greenfield selection. 2.3 The NSIP process in this instance is critically opaque. Furthermore, there is an absolute lack of directly comparable UK precedent for NSIP-scale solar projects, rendering the Cleve Hill example entirely irrelevant for a meaningful comparison to the scale and specific characteristics of this proposal. 2.4 Relevant Policy: NPS EN-3 (Renewable Energy Infrastructure) explicitly states developers should prioritize brownfield sites where possible.	As detailed in **ES Volume 1, Chapter 4 Alternatives and Design Evolution [APP-056] and ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185] (SSAR)**, the Applicant has followed a staged approach to assessment, taking into consideration a range of planning, environmental and operational factors. Potentially willing landowners with large scale land holdings within the search area was a consideration, however it is not the only consideration in the site selection process. As to consideration of brownfield sites, the SSAR sets out how brownfield sites have been considered in line with policy. None of the brownfield sites identified within the 20 km search area are considered viable for the Scheme. The Applicant considers that **ES Volume 1, Chapter 4 Alternatives and Design Evolution [APP-056] and ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]** appropriately justify the site selection for the Scheme. Regarding impacts on Best and Most Versatile (BMV) agricultural land, NPS EN-3 paragraph 2.10.23 recognises that solar developments at this scale are likely to use some agricultural land and applicants should explain their choice of site, noting the preference for development to be on suitable brownfield, industrial and low and medium grade agricultural land.

Reference	Theme	Comments/Issues Raised	Applicant's Response
		The developer has failed to adequately demonstrate why this greenfield site is acceptable given the availability of brownfield alternatives. 2.5 Relevant Policy: Wiltshire Core Strategy Policy 42 demands that standalone renewable energy installations must not have significant adverse impacts on Best and Most Versatile (BMV) agricultural land, supporting a preference for brownfield alternatives. This proposal directly contradicts this policy by occupying valuable agricultural land without compelling justification. Action Items and Demands 17.1 Compile and submit a comprehensive and independent comparative assessment of brownfield sites with existing grid connections as superior alternatives to Lime Down.	NPS EN-1 paragraph 5.11.34 provides that use of BMV land should be justified. The areas of each Agricultural Land Classification (ALC) grade affected by the Scheme are set out **in ES Volume 1, Chapter 17, Section 17.7 [APP-069]**. Of the agricultural land within the Solar PV Sites, approximately 477.4 hectares (around 67%) is classified as Subgrade 3b or Grade 4 and is therefore not BMV land. There is no Grade 1 land, around 30.8 hectares (approximately 4%) of Grade 2 land, and approximately 209.3 hectares (around 29%) of Subgrade 3a land. The distribution of ALC grades is shown in **ES Volume 2, Figure 17-2: Agricultural Land Classification Mapping [APP-172]**. The Applicant has had regard to agricultural land quality in the design and site selection process and has sought, where practicable, to locate infrastructure on lower quality land. The Scheme will result in a temporary but long-term and reversible loss of agricultural land for the operational life of the Scheme. As set out in **ES Volume 1, Chapter 17, Section 17.10 [APP-069]**, this gives rise to a temporary, long-term moderate adverse effect on agricultural land overall, and a temporary, long-term major/moderate adverse effect on BMV land, both of which are assessed as significant. These effects are fully reported in the ES and are a matter for the Secretary of State to weigh in the planning balance against the need for the Scheme and its wider benefits. There are no significant permanent effects on agricultural land, as all land will be returned to its original use and condition as far as practicable following decommissioning. The Applicant notes that the approach to assessing the quality of the agricultural land is under discussion with Natural England and is set out in the relevant Statement of Common Ground to be submitted at Deadline 1. Measures to avoid and minimise effects on soils and agricultural land

Reference	Theme	Comments/Issues Raised	Applicant's Response
			are embedded within the Scheme design and secured through Schedule 2, Requirement 17 of the **Draft DCO [APP-016]** which includes the preparation and implementation of a Soil Resources Management Plan (SRMP) in accordance with the **Outline SRMP [APP-280].** The SRMP will control soil handling, storage and reinstatement during construction, operation and decommissioning, and a requirement to prepare and implement a Decommissioning Strategy in accordance with the **Outline Decommissioning Strategy [APP-279],** which is secured by Schedule 2, Requirement 20 of the **Draft DCO [APP-016]**. The **Outline Landscape and Ecological Management Plan [APP-283]** details how grassland and other habitat will be established beneath and between the solar panels. The detailed LEMP will be secured through Schedule 2, Requirement 7 of the **Draft DCO [APP-016]**. Through the establishment and maintenance of long-term grassland beneath and between the solar arrays, soil health, quality and structure are anticipated to improve over the lifetime of the Scheme, resulting in a temporary, moderate beneficial effect on soil resources at decommissioning, which is assessed as significant (**ES Volume 1, Chapter 17, Sections 17.10 and 17.12 [APP-069]**). In relation to suggestions that brownfield land or alternative locations should be used, including rooftop, these matters are addressed in **ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP-056] and in the Statement of Need [APP-266]**. The Applicant has considered alternatives, including previously developed land and other forms of solar deployment, as part of the site selection and design evolution process. As shown in Table 2-2 of **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]**, the Applicant has considered previously developed land / brownfield land over 1 hectare within the area of search, based on the brownfield land registers of

Reference	Theme	Comments/Issues Raised	Applicant's Response
			the relevant Local Planning Authorities, and concluded that none of the sites are large enough to provide a viable land parcel of at least 40 ha and sites were not considered to be available as they have planning permission for residential development and/or are allocated for residential/mixed use development.
CLNF-003	Cultural Heritage	Heritage and Landscape Impacts 3.1 Sections A, B, and C of the proposal are situated on boundaries with national landscapes, with the historic Fosse Way prominently bisecting all three sections. 3.2 The visualizations provided within the application are wholly inadequate and fail utterly to provide a clear and comprehensive understanding of the devastating proposed landscape impact. 3.3 Visual impacts from viewpoints such as Sherston and Easton Grey will undoubtedly include extensive solar arrays and a massive BESS, visible across many miles, fundamentally altering the rural vista. 3.4 Bradfield Manor, a Grade I listed building located near the railway, is situated within hundreds of metres of the proposed BESS. This proximity will irrevocably compromise its heritage views and setting. 3.5 Farleaze Farm (Grade II), which used to have the art studio for Raoul Millais, set within 60 acres, possesses a highly valued setting that will suffer irreparable harm from the proposed development. 3.6 Norton Manor (Grade II*), central to Norton village and a highly regarded building, will experience severe and unacceptable adverse impacts on its setting from multiple approaches, as well	**ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, supported by appendices in **ES Volume 3 (12.1 to 12.8) [APP-219 to APP-232]** has assessed the potential impact of the scheme on heritage assets. The assessments consider the significance and setting of heritage assets, including Bradfield Manor Farmhouse, Farleaze Farm and Norton Manor. As stated in **Appendix 12.1: Heritage Statement [APP-219]** when considering the contribution of setting to the significance of the Grade I Listed Bradfield Manor Farmhouse (NHLE: 1198808), the asset is largely defined and experienced from within the Bradfield Manor Farmhouse grounds, in particular the walled courtyard to the south-west of the asset, where the full architectural interest of its south-facing primary elevation can be appreciated. Lime Down D is located within agricultural land to the north of asset. Following advice provided by Historic England, panels in Field D5 were set back away from Grade I Listed Bradfield Manor Farmhouse and enhanced screening is proposed along existing hedgerows. Views of the proposed BESS and 400 kV Substation from Bradfield Manor Farmhouse will be largely mitigated by the proposed new woodland belt along the south-eastern boundary of Field D3 which, in combination with the existing woodland block west of D1 and south of D22, provides extensive screening in views to and from Bradfield Manor Farmhouse. It was identified that there would be a moderate / minor (not significant) adverse effect to the asset (less than substantial harm at the lower end in NPPF terms) as a result of indirect (i.e. setting) impacts.

Reference	Theme	Comments/Issues Raised	Applicant's Response
		as significant and very damaging effects resulting from the noise of the BESS particularly at night; all local residents will be directly effected by noise which is completely out of keeping with the character of the area. 3.7 The suggested mitigation strategy, relying on the growth of new hedges over an unrealistic estimated 15 years, is demonstrably insufficient and fundamentally inappropriate for the existing landscape character. Many established hedgerows in the area, some of considerable age, are typically around 2m high, defining the long views. Creating "*tunnels*" of taller, incongruous hedging to screen these industrial structures would be entirely out of keeping and destroy the established rural aesthetic. 3.8 Relevant Policy: NPS EN-1 Section 5.8 (Historic Environment) unequivocally states that infrastructure can have adverse impacts on heritage assets. It requires the applicant to describe the significance of any heritage assets affected, including their setting, and demands that great weight must be given to the asset's conservation. This proposal fails to meet these stringent requirements. 3.9 Relevant Policy: NPPF Chapter 16 Paragraph 205 insists that "*great weight should be given to the asset's conservation*" regarding designated heritage assets. This project plainly disregards this fundamental principle. 3.10 Relevant Policy: Wiltshire Core	Following embedded mitigation (see Section 12.9 of **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**) no impacts have been identified to Grade II* Listed Norton Manor (NHLE: 1023215) and Grade II Listed Farleaze Farmhouse (NHLE: 1251985). Since the design presented at PEIR stage, Field C26, the westernmost part of Field C25, and the majority of Field C13 have been entirely removed from the Order Limits. Solar PV Panels have also been removed entirely from within Fields B1-B5, C24-C25, and C13. A number of fields abutting the Fosse Way within which Solar PV Panels will be erected have had offsets established with their boundaries with Fosse Way, including Fields B6, C10-C12, and C22-C23. **Appendix 12.1: Heritage Statement [APP-219]** identified that the overall setting and significance of the Fosse Way will remain intact, and the asset will retain its legibility as a roadway within a largely agrarian landscape. Consequently, no significant effects were identified to the asset. As detailed in Section 12.3 of **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, the cultural heritage assessment has been undertaken in accordance with relevant legislation, policy and guidance, including the Planning (Listed Buildings and Conservation Areas) Act 1990 and Overarching National Policy Statement for Energy (EN-1) (January 2024). Where harm to heritage assets has been identified this has been assessed to comprise 'less than substantial harm' (see **ES Volume 3, Appendix 12-1: Heritage Statement [APP-219]**). The Applicant highlights paragraph 5.9.33 of NPS EN-1 "*Where the proposed development will lead to less than substantial harm to the significance of the designated heritage asset, this harm should be weighed against the public benefits of the proposal, including, where appropriate securing its optimum viable use.*" The public benefits of the scheme are detailed in **ES Volume 1, Chapter 5: Energy Need, Legislative Context and Energy Policy [APP-057].**

Reference	Theme	Comments/Issues Raised	Applicant's Response
		Strategy Policy 58 (Ensuring the Conservation of the Historic Environment) requires that development must not adversely affect the significance of heritage assets, including their setting. This proposal violates this core policy. 3.11 Relevant Policy: Wiltshire Core Strategy Policy 51 (Landscape) mandates that development must protect, conserve, and enhance Wiltshire's distinctive landscape character and requires proposals to demonstrate they have taken into account the Wiltshire Landscape Character Assessment. The proposed mitigation is unacceptable and fails to meet this policy.	With reference to point 3.2, baseline photography and photomontages of the Scheme supports the Landscape and Visual impact Assessment (LVIA) and is presented in ES Volume 3, Figure 8-14 **[APP103- 105]** and revision [**APP AS001].** Figure 8-14 includes photography from 55 Viewpoints and is representative of range of receptors including residential properties, Public Rights of Way and roads. Visualisation or photomontages were prepared from a number of Viewpoints and were agreed with Wiltshire Council and the CNL Board. Viewpoint 5 is located on a footpath on the southeastern edge of Sherston. There are no viewpoints from Easton Grey as there is no intervisibility between the village and the Scheme due to intervening vegetation and topography. The selection of viewpoints where photomontages were agreed was based on the PEIR layout and informed the final layout following consultation. Additional visualisations from Bradfield Manor Farmhouse will be produced at Deadline 1. With reference to point 3.7, the proposed mitigation planting includes for substantial areas of new woodland, hedgerow and meadow planting, which once established would provide positive contributions to the countryside in line with the Wiltshire's Nature Recovery Strategy. It is agreed that the mitigation planting, particularly allowing hedgerows to become taller and maintained to a height of 4.5m would cause a change in landscape character and loss of longer views over the landscape in some places. However, it is noted that not all of Wiltshire's hedgerows are maintained to a low height and this change would not be significant or permanent as hedgerows could be clipped low again following decommissioning. The defining legacy of the landscape would be the robust framework of features that have improved through the mitigation and landscape enhancements. This mitigation in turn would give rise to long-term wider benefits, including maintaining and enhancing biodiversity and in promoting the resilience of ecosystems. NPS EN-1 recognises at para 5.10.5 that

Reference	Theme	Comments/Issues Raised	Applicant's Response
			"*Virtually all nationally significant energy infrastructure projects will have adverse effects on the landscape, but there may also be beneficial landscape character impacts arising from mitigation*." The industry standard of assessing The Guidelines for Landscape and Visual Impact Assessment notes that "W*here planting is intended to provide a visual screen for the development it may be appropriate to assess the effects for different seasons and periods of time (for example, at year 1, representing the start of the operational stage, year 5 and year 15) in order to demonstrate the contribution to reducing the adverse effects of the scheme at different stages. In such projections the assumptions made about growth rates of planting should be clearly stated*." Page 31 of the LVIA in ES Volume 1, Chapter 8: Landscape and Visual **[APP-060]** every 1 year sets out the assumptions made about growth rates and states: "*A uniform rate of growth is allowed for trees, shelterbelts, and woodland mitigation planting of 0.4m every 1 year. At Year 15 this will result in new trees, shelterbelts, and woodland plantings having reached a minimum height of 7.5m. A uniform growth rate is allowed for new hedgerows of 0.4m every 1 year. This would result in hedgerows being able to be maintained at a height of between 3 - 5m by Year 15*." With reference to point 3.8, compliance with national and local heritage policy, including the requirements of NPS EN-1, is set out in Annex A (National Policy) and Annex B (Local Policy) of the **Planning Statement [APP-574]**. Those tables specifically address Section 5.8 of NPS EN-1 and demonstrate how **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]** and its supporting appendices identify heritage assets, assess their significance (including setting), evaluate potential impacts, and apply appropriate mitigation.

Reference	Theme	Comments/Issues Raised	Applicant's Response
CLNF-004	Noise and Vibration	Noise and Vibration 4.1 The baseline environment is characterised by profound rural tranquillity, with numerous equestrian centres and studs located within metres of the proposed BESS and solar arrays. 4.2 Solar arrays are planned at a height of approximately 4.5 metres, with tracking motors predicted to generate a continuous and pervasive low-level hum day and night, fundamentally altering the soundscape. 4.3 Irrefutable concerns exist regarding the widespread and severe adverse impacts on mental health and well-being due directly to the incessant noise and vibration, which will be experienced over a vast area. 4.4 Construction impacts are projected to last two years and will cause unacceptable and intolerable disruption for local residents. 4.5 While Cleve Hill is cited, questions regarding the robustness of developer assurances are paramount, as relevant noise and vibration studies conspicuously lack UK validation or professional qualification for this specific type of project. Their assurances are therefore unfounded and unreliable. 4.6 Ongoing noise sources will include incessant piling and thumping during infrastructure installation and continuous, disruptive transport movements throughout the entire construction phase.	The noise and vibration impacts arising from construction activities are assessed in Section 14.10 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**. Mitigation measures are committed to through the **Outline Construction Environmental Management Plan [APP-277]**. Noise from the installation of solar PV panels will be spread across the site over the course of the construction period and therefore will only be at the levels presented for each relevant sensitive receptor in Table 14-18 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]** for the closest set of works to that receptor rather than the full two years. As a reasonable worst-case, the assessment includes the noise from piling rigs that are larger and louder than those used in practice. The assessment also includes the noise from construction traffic. A noise monitoring programme agreed with Wiltshire Council will be carried out during construction. Noise levels from construction activity are listed in Table 1 of **ES Volume 3, Appendix 14-4: Noise Modelling [APP-237]** and are derived from well validated data contained in BS5228:2009+A1:2014. These source levels form the basis of a reasonable worst-case construction assessment conducted by experienced and suitably qualified professionals, as summarised in **ES Volume 3, Appendix 1-1: Statement of Competence [APP-180].** The preparation, approval and implementation of the Construction Environmental Management Plan, substantially in accordance with the **Outline CEMP [APP-277]**, is secured through Requirement 13 in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that construction noise and vibration are appropriately controlled. With these measures in place, the assessment concludes that no significant effects from construction noise or vibration are expected.

Reference	Theme	Comments/Issues Raised	Applicant's Response
		4.7 The developer has failed to provide sufficiently clear details on the exact specification of the solar panels and tracking mechanisms. This critical lack of precise information precludes a thorough and accurate assessment of the potential noise and vibration effects. 4.8 Relevant Policy: NPS EN-1 Section 5.11 (Noise and Vibration) demands noise assessments to comply with British Standards. It categorically states that development consent should not be granted if significant adverse noise impacts cannot be mitigated. The developer has failed to demonstrate effective mitigation. 4.9 Relevant Policy: Wiltshire Core Strategy Policy 42 specifically requires that renewable energy proposals demonstrate no significant adverse impacts on residential amenity, including noise. This proposal will undoubtedly inflict significant adverse impacts. Action Items and Demands 17.3 Commission independent, UK-qualified noise and vibration studies for 4.5 m rotating arrays and large BESS near equestrian and residential areas.	The noise impacts from the operation of the Scheme and its components are assessed in Section 14.10 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**. As explained in Section 14.4 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]** noise from moveable panels would not be audible at residential properties. As shown in Table 8 of **ES Volume 3, Appendix 14-4: Noise Modelling [APP-237]**, levels would typically be below or slightly above the existing background sound in the area. The levels have been calculated, using the appropriate international standard, on a worst-case assumption that wind is blowing from the source of the noise to the receptor locations, as stated in paragraph 14.4.15 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**. The **Outline Operational Environmental Management Plan [APP-278]** commits to noise levels from the Scheme at residential dwellings being the same as or below those modelled in the ES. This is likely to include a significant number of silencer units and enclosures and provides assurance that significant effects from operational noise will be avoided, while allowing flexibility in how this is achieved. Impacts on mental health and wellbeing in respect of noise and vibration have been assessed in **ES Chapter 18: Human Health [APP-070]** and find that no significant effects are anticipated as a result of any phase of the Scheme. Consultation with Wiltshire Council's Public Health Team has informed the approach to mental health considerations, as documented in **ES Volume 3, Appendix 18-1: Human Health Consultation [APP-244].** Through this engagement, the Applicant has committed to signposting locally available mental health and wellbeing resources to members of the public engaging with the Scheme, using information provided by Wiltshire Council's Public Health Team. The Applicant will continue to monitor consultation responses relating to mental health and will provide appropriate signposting to existing local support services where requested.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			The preparation, approval and implementation of the detailed OEMP, substantially in accordance with the **Outline Operational Environmental Management Plan [APP-278]**, are secured through Requirement 14 of Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring operational noise is appropriately controlled throughout the lifetime of the Scheme. A summary of how the application meets the requirements of NPS EN-1 is provided in Table 1 of **ES Volume 3, Appendix 14-1: Noise and Vibration Legislation, Policy and Guidance [APP-234].** By avoiding significant adverse effects on health and quality of life the Scheme also aligns with Wiltshire Core Strategy. The relevant parts of the Wiltshire Core Strategy are also presented in **ES Volume 3, Appendix 14-1: Noise and Vibration Legislation, Policy and Guidance [APP-234]**.
CLNF-005	Noise and Vibration	Noise and Vibration 4.1 The baseline environment is characterised by profound rural tranquillity, with numerous equestrian centres and studs located within metres of the proposed BESS and solar arrays. 4.2 Solar arrays are planned at a height of approximately 4.5 metres, with tracking motors predicted to generate a continuous and pervasive low-level hum day and night, fundamentally altering the soundscape. 4.3 Irrefutable concerns exist regarding the widespread and severe adverse impacts on mental health and well-being due directly to the incessant noise and vibration, which will be experienced over a vast area. 4.4 Construction impacts are projected to last two years and will cause	The noise and vibration impacts arising from construction activities are assessed in Section 14.10 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**. Mitigation measures are committed to through the **Outline Construction Environmental Management Plan [APP-277]**. Noise from the installation of solar PV panels will be spread across the site over the course of the construction period and therefore will only be at the levels presented for each relevant sensitive receptor in Table 14-18 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]** for the closest set of works to that receptor rather than the full two years. As a reasonable worst-case, the assessment includes the noise from piling rigs that are larger and louder than those used in practice. The assessment also includes the noise from construction traffic. A noise monitoring programme agreed with Wiltshire Council will be carried out during construction. Noise levels from construction activity are listed in Table 1 of **ES Volume 3, Appendix 14-4: Noise Modelling [APP-237]** and are

Reference	Theme	Comments/Issues Raised	Applicant's Response
		unacceptable and intolerable disruption for local residents. 4.5 While Cleve Hill is cited, questions regarding the robustness of developer assurances are paramount, as relevant noise and vibration studies conspicuously lack UK validation or professional qualification for this specific type of project. Their assurances are therefore unfounded and unreliable. 4.6 Ongoing noise sources will include incessant piling and thumping during infrastructure installation and continuous, disruptive transport movements throughout the entire construction phase. 4.7 The developer has failed to provide sufficiently clear details on the exact specification of the solar panels and tracking mechanisms. This critical lack of precise information precludes a thorough and accurate assessment of the potential noise and vibration effects. 4.8 Relevant Policy: NPS EN-1 Section 5.11 (Noise and Vibration) demands noise assessments to comply with British Standards. It categorically states that development consent should not be granted if significant adverse noise impacts cannot be mitigated. The developer has failed to demonstrate effective mitigation. 4.9 Relevant Policy: Wiltshire Core Strategy Policy 42 specifically requires that renewable energy proposals demonstrate no significant adverse impacts on residential amenity, including noise. This proposal will	derived from well validated data contained in BS5228:2009+A1:2014. These source levels form the basis of a reasonable worst-case construction assessment conducted by experienced and suitably qualified professionals, as summarised in **ES Volume 3, Appendix 1-1: Statement of Competence [APP-180].** The preparation, approval and implementation of the Construction Environmental Management Plan, substantially in accordance with the **Outline CEMP [APP-277]**, is secured through Requirement 13 in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that construction noise and vibration are appropriately controlled. With these measures in place, the assessment concludes that no significant effects from construction noise or vibration are expected. The noise impacts from the operation of the Scheme and its components are assessed in Section 14.10 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**. As explained in Section 14.4 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]** noise from moveable panels would not be audible at residential properties. As shown in Table 8 of **ES Volume 3, Appendix 14-4: Noise Modelling [APP-237]**, levels would typically be below or slightly above the existing background sound in the area. The levels have been calculated, using the appropriate international standard, on a worst-case assumption that wind is blowing from the source of the noise to the receptor locations, as stated in paragraph 14.4.15 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**. The **Outline Operational Environmental Management Plan [APP-278]** commits to noise levels from the Scheme at residential dwellings being the same as or below those modelled in the ES. This is likely to include a significant number of silencer units and enclosures and provides assurance that significant effects from operational noise will be avoided, while allowing flexibility in how this is achieved.

Reference	Theme	Comments/Issues Raised	Applicant's Response
		undoubtedly inflict significant adverse impacts. Action Items and Demands 17.3 Commission independent, UK-qualified noise and vibration studies for 4.5 m rotating arrays and large BESS near equestrian and residential areas.	Impacts on mental health and wellbeing in respect of noise and vibration have been assessed in **ES Chapter 18: Human Health [APP-070]** and find that no significant effects are anticipated as a result of any phase of the Scheme. Consultation with Wiltshire Council's Public Health Team has informed the approach to mental health considerations, as documented in **ES Volume 3, Appendix 18-1: Human Health Consultation [APP-244].** Through this engagement, the Applicant has committed to signposting locally available mental health and wellbeing resources to members of the public engaging with the Scheme, using information provided by Wiltshire Council's Public Health Team. The Applicant will continue to monitor consultation responses relating to mental health and will provide appropriate signposting to existing local support services where requested. The preparation, approval and implementation of the detailed OEMP, substantially in accordance with the **Outline Operational Environmental Management Plan [APP-278]**, are secured through Requirement 14 of Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring operational noise is appropriately controlled throughout the lifetime of the Scheme. A summary of how the application meets the requirements of NPS EN-1 is provided in Table 1 of **ES Volume 3, Appendix 14-1: Noise and Vibration Legislation, Policy and Guidance [APP-234].** By avoiding significant adverse effects on health and quality of life the Scheme also aligns with Wiltshire Core Strategy. The relevant parts of the Wiltshire Core Strategy are also presented in **ES Volume 3, Appendix 14-1: Noise and Vibration Legislation, Policy and Guidance [APP-234]**.
CLNF-006	Other Environmental Matters	Glint and Glare 6.1 There is no directly comparable UK precedent for 4.5-metre rotating solar panels at this scale, meaning potential	Glint and Glare impacts from single-axis tracking panels can be suitably modelled using specialist software. Impacts upon at-risk groups have been considered within **ES Volume 3, Appendix 20-4**

Reference	Theme	Comments/Issues Raised	Applicant's Response
		impacts remain entirely untested and unknown. 6.2 At-risk groups include horses (including breeders and riders), local residents, drivers, and train drivers, will be severely affected due to the railway bisecting potential glare corridors. This presents an unacceptable safety hazard. 6.3 A critical assurance gap exists, as reliable mitigation strategies or precedent-based reassurances for this specific technology configuration are simply not provided. 6.4 The developer has failed to provide sufficiently clear details on the exact specification of the solar panels, which is vital for an accurate assessment of glint and glare effects. 6.5 Relevant Policy: NPS EN-3 explicitly addresses solar photovoltaic generation and requires the assessment of visual impact, including glint and glare on neighboring uses and transport infrastructure. The current assessment is deficient. 6.6 Relevant Policy: Wiltshire Core Strategy Policy 42 requires proposals to demonstrate no significant adverse impacts on residential amenity, specifically referencing glint and glare. This proposal will undoubtedly impose significant adverse impacts.	**Solar Photovoltaic Glint and Glare Study [APP-261]** and no significant impacts are predicted. No further mitigation is recommended, however mitigation measures for glint and glare are well-understood and have been successfully implemented on many solar farms in the UK and internationally. The exact specification of solar panels is a minor consideration for glint and glare modelling and would not be considered to significantly affect the results. A worst-case assumption of smooth glass with anti-reflective coating has been used for the solar panel material within glint and glare modelling. To confirm, a Glint and Glare Assessment has been produced in line with NPS EN-3 (**ES Volume 3, Appendix 20-4 Solar Photovoltaic Glint and Glare Study [APP-261]**), which considers nearby receptors and no significant impacts are predicted from glint and glare including upon residential amenity. This complies with Wiltshire Core Strategy Policy 42. The Applicant is confident that the proposed management and mitigation measures set out in the **Environmental Statement [APP-052 to APP-265]** are comprehensive and robust and that the Scheme aligns with national and local planning policy; this is outlined in the **Planning Statement [APP-267]**. Of particular relevance are Annex A: National Policy Statement Accordance Tables and Annex B: Local Policy Accordance Tables, of the Planning Statement which set out an appraisal of the Scheme against national and local planning policies.
CLNF-007	Ecology and Biodiversity	Ecology 7.1 Species present on site include skylarks, great crested newts (pond tests positive), field mice, and wood mice,	The assessment in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]** identifies skylarks as a key species of conservation interest within the Scheme area. It concludes that a proportion of the current skylark and population will be displaced from

Reference	Theme	Comments/Issues Raised	Applicant's Response
		which will be directly impacted. 7.2 Outcomes will include the long-term or permanent loss of skylarks from several fields, representing an unacceptable loss of biodiversity. 7.3 Concerns are grave that proposed policy changes will actively undermine ecological protections rather than ensuring the preservation of existing biodiversity. 7.4 The unprecedented scale and specific nature of tracking solar panels of this size raise concerns that the effects on ecology and nature are grossly underestimated and inadequately understood. This area must not be used as an experimental testing ground for a project whose long-term environmental impacts are unproven and potentially catastrophic. 7.5 Relevant Policy: NPPF Chapter 15 (Conserving and enhancing the natural environment) demands protecting biodiversity and achieving Biodiversity Net Gain. This project fails to demonstrate how it will achieve this; instead, it promises significant loss. 7.6 Relevant Policy: Wiltshire Core Strategy Policy 50 (Biodiversity and Geodiversity) requires development to demonstrate no net loss of biodiversity and protection of protected species. This proposal directly contravenes this fundamental policy. Action Items and Demands 17.9 Update and validate ecology surveys for skylarks, great crested newts,	the Solar PV Sites, which will give rise to an adverse residual effect at a Local level. Skylark-specific mitigation and habitat enhancement measures are incorporated into the Scheme design to reduce effects as far as practicable. These include the provision of suitably large, open set-aside and grassland habitats designed to provide appropriate breeding and foraging conditions. These measures are illustrated in **ES Volume 2, Figure 3-4: Landscape and Ecological Mitigation Plan [APP-084]** and detailed in the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283**]. Skylarks have been observed gathering food from within operational solar farms and leading young into them, indicating they are valuable foraging resources. Whilst it is assumed that skylarks will typically avoid nesting in solar farms, skylark foraging habitat requirements are less strict. **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]** provides a balanced assessment of likely significant effects, identifying residual effects where these remain after mitigation. The Chapter has considered the use of tracking panels as part of the assessment. Unavoidable adverse impacts have been minimised through careful design and are subsequently addressed through mitigation, compensation and long-term management to be secured via DCO Requirements including the **Outline Landscape and Ecological Management Plan (Outline LEMP) [APP-283]** and the **Outline Ecological Protection and Mitigation Strategy (Outline EPMS) [APP-284].** This is in accordance with The Applicant considers that residual significant effects on habitats and species are clearly set out within **ES Chapter 9 [APP-061]** in line with EIA guidance and are limited to short-term loss of hedgerows and displacement of ground nesting birds, which have been mitigated

Reference	Theme	Comments/Issues Raised	Applicant's Response
		field/wood mice; prepare robust and independently verifiable mitigation/no net loss strategies.	for as far as possible within the Scheme in the Applicant's view. **ES Chapter 9 [APP-061]** also identifies significant residual beneficial benefits during the Operation and Maintenance phase of the Scheme for a range of ecological features, including other neutral grassland, woodland, ponds, hedgerows, watercourses, badgers, bats, dormice, brown hare, harvest mouse, hedgehog, polecat, amphibians, reptiles, breeding birds, overwintering birds and terrestrial invertebrates. Field mice and wood mice are not explicitly assessed within **ES Chapter 9 [APP-061].** The Scheme's baseline biodiversity units have been calculated with the use of the DEFRA published standardised Statutory Biodiversity Metric ('the Metric') and based on comprehensive habitat surveys undertaken by the Applicant's professional ecologists. The Metric has been used to compare the baseline biodiversity units with the projected post-development units. The projected post-development units have been calculated based on the habitat creation and enhancement measures shown in **ES Volume 2, Figure 3-4: Landscape and Ecological Mitigation Plan [APP-084]** and detailed in the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]**. Details of the Scheme's approach to BNG are provided in the **Biodiversity Net Gain Report [APP-273]** and the full BNG calculations are provided in a copy of the Metric **[APP-274]**. These calculations demonstrate the Scheme will result in a considerable net gain for biodiversity and can thus be considered in accordance with NPPF section 15 and Wiltshire Core Strategy Policy 50.
CLNF-008	Human Health	Community and Mental Health 8.1 The project has already generated profound local distress and pervasive anxiety, with reports of severe impacts on family well-being and an unacceptable degradation of quality of life over the anticipated two-year construction	8.1 and 8.2. Consultation with Wiltshire Council's Public Health Team has informed the approach to mental health considerations, as documented in **ES Volume 3, Appendix 18-1: Human Health Consultation [APP-244]**. Through this engagement, the Applicant has committed to signposting locally available mental health and wellbeing resources to members of the public engaging with the Scheme, using information provided by Wiltshire Council's Public

Reference	Theme	Comments/Issues Raised	Applicant's Response
		period. 8.2 Social dynamics indicate that while collective opposition has strengthened community cohesion, the overall process has undeniably caused deep division and severe upset within the community. 8.3 There is no directly comparable UK-scale BESS-solar development in a similar rural setting. Therefore, any assurances regarding post-project normality are baseless and entirely without validity, leading to profound concerns about their sincerity.	Health Team. The Applicant will continue to monitor consultation responses relating to mental health and will provide appropriate signposting to existing local support services where requested. The Applicant is confident that the assessment undertaken in **ES Volume 1, Chapter 18: Human Health [APP-070]** is robust and adequately addresses the likely impacts on human health that are expected as a result of the Scheme, including those that have implications across multiple assessed topic areas. The Applicant highlights that the assessment of human health specifically relies upon the assessment outcomes for matters including but not limited to transport, noise, air quality, and recreation, to ensure that a holistic approach to assessing health and wellbeing has been undertaken in accordance with national and local policy requirements. The Applicant notes that the assessment methodology for health and wellbeing has been agreed with Wiltshire Council's Public Health team and is set out in the Statement of Common Ground with Wiltshire Council to be submitted at Deadline 1. 8.3 The potential visual effects associated with the proposed Battery Energy Storage System (BESS) have been assessed as part of the Landscape and Visual Impact Assessment (LVIA) in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**. This assessment identifies where visual changes may occur, evaluates the sensitivity of receptors, and considers the magnitude of change resulting from the Scheme. The LVIA assesses the likely significant effects of the Scheme, including the BESS, during construction, operation and decommissioning on identified landscape and visual receptors. This includes residential properties, users of public rights of way and transport receptors. The assessment considers the sensitivity of

Reference	Theme	Comments/Issues Raised	Applicant's Response
			receptors, the magnitude of change and the resulting significance of effect. The BESS has been assessed as part of the worst-case parameters for above-ground infrastructure, including through Zone of Theoretical Visibility analysis and representative viewpoints agreed through consultation with Wiltshire Council and the Cotswolds National Landscape Board. Photomontages **[APP103 – 105]** have been prepared where significant effects were anticipated to assist in understanding how the BESS and other infrastructure would appear in the landscape. Through the iterative design process, the layout and positioning of infrastructure, including the BESS, has been refined to reduce visual influence. Embedded mitigation measures are set out in Section 8.9 of **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]** and include landscape buffers, retention of existing hedgerows and woodland, and new planting to provide screening and integration over time. These measures are secured via DCO Requirement 5 Detailed Design Approval and Requirement 7 Landscape and Ecological Management Plan. The LVIA identifies where significant visual effects would occur and reports residual effects following mitigation. It concludes that visual effects associated with the Scheme, including the BESS, are localised and would reduce over time as mitigation planting establishes. The decommissioning of the Scheme has been assessed within the **ES [APP-052 to APP-265]** which considers the effects associated with decommissioning activities. As part of the assessment, appropriate mitigation measures are incorporated into the Scheme.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Information on decommissioning activities is provided within the **ES [APP-052 to APP-265]** and within the **Outline Decommissioning Strategy [APP-279]**. The information is provided in accordance with the requirements of Part 1 of Schedule 4 of the EIA Regulations 2017 (as amended). Schedule 4 of the EIA Regulations 2017 (as amended) set out the information for inclusion in an ES. **ES Volume 1 Chapter 1 Introduction [APP-053]** Table 1-2 identifies where the requirements of Schedule 4 of the EIA Regulations 2017 (as amended) have been addressed. At the end of the Scheme's operational life, all Solar PV Sites, including BESS, would be decommissioned and the land restored to its original use and condition as far as practicable. There will be opportunities for the retention of a range of biodiversity improvements, including established habitats, hedgerows and woodland, beyond the decommissioning of the Scheme, ultimately enhancing the ecological value of the area. Measures to manage and minimise disruption during decommissioning are set out in the **Outline Decommissioning Strategy [APP-279]**. This explains how mitigation measures identified in the **ES [APP-052 to APP-265]** will be implemented during decommissioning and includes controls for working hours, noise, lighting, traffic management, pollution prevention, waste management and community liaison. The **Outline Decommissioning Strategy [APP-279]** also confirms that decommissioning activities will be undertaken in phases over an anticipated 12–24-month period, with measures to coordinate traffic movements, control noise and vibration in accordance with best practicable means and manage temporary lighting to minimise effects on nearby receptors.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			A detailed Decommissioning Strategy will be prepared substantially in accordance with the **Outline Decommissioning Strategy [APP-279]** and must be submitted to and approved by the relevant local planning authority prior to the commencement of decommissioning. This is secured through Requirement 20 in Schedule 2 of the **Draft Development Consent Order [APP-016]**.
CLNF-009	Human Health	Community and Mental Health 8.1 The project has already generated profound local distress and pervasive anxiety, with reports of severe impacts on family well-being and an unacceptable degradation of quality of life over the anticipated two-year construction period. 8.2 Social dynamics indicate that while collective opposition has strengthened community cohesion, the overall process has undeniably caused deep division and severe upset within the community. 8.3 There is no directly comparable UK-scale BESS-solar development in a similar rural setting. Therefore, any assurances regarding post-project normality are baseless and entirely without validity, leading to profound concerns about their sincerity.	8.1 and 8.2. Consultation with Wiltshire Council's Public Health Team has informed the approach to mental health considerations, as documented in **ES Volume 3, Appendix 18-1: Human Health Consultation [APP-244]**. Through this engagement, the Applicant has committed to signposting locally available mental health and wellbeing resources to members of the public engaging with the Scheme, using information provided by Wiltshire Council's Public Health Team. The Applicant will continue to monitor consultation responses relating to mental health and will provide appropriate signposting to existing local support services where requested. The Applicant is confident that the assessment undertaken in **ES Volume 1, Chapter 18: Human Health [APP-070]** is robust and adequately addresses the likely impacts on human health that are expected as a result of the Scheme, including those that have implications across multiple assessed topic areas. The Applicant highlights that the assessment of human health specifically relies upon the assessment outcomes for matters including but not limited to transport, noise, air quality, and recreation, to ensure that a holistic approach to assessing health and wellbeing has been undertaken in accordance with national and local policy requirements. The Applicant notes that the assessment methodology for health and wellbeing has been agreed with Wiltshire Council's Public Health team and is set out in the Statement of Common Ground with Wiltshire Council to be submitted at Deadline 1.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			8.3 The potential visual effects associated with the proposed Battery Energy Storage System (BESS) have been assessed as part of the Landscape and Visual Impact Assessment (LVIA) in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**. This assessment identifies where visual changes may occur, evaluates the sensitivity of receptors, and considers the magnitude of change resulting from the Scheme. The LVIA assesses the likely significant effects of the Scheme, including the BESS, during construction, operation and decommissioning on identified landscape and visual receptors. This includes residential properties, users of public rights of way and transport receptors. The assessment considers the sensitivity of receptors, the magnitude of change and the resulting significance of effect. The BESS has been assessed as part of the worst-case parameters for above-ground infrastructure, including through Zone of Theoretical Visibility analysis and representative viewpoints agreed through consultation with Wiltshire Council and the Cotswolds National Landscape Board. Photomontages **[APP103 – 105]** have been prepared where significant effects were anticipated to assist in understanding how the BESS and other infrastructure would appear in the landscape. Through the iterative design process, the layout and positioning of infrastructure, including the BESS, has been refined to reduce visual influence. Embedded mitigation measures are set out in Section 8.9 of **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]** and include landscape buffers, retention of existing hedgerows and woodland, and new planting to provide screening and integration over time. These measures are secured via DCO Requirement 5 Detailed Design Approval and Requirement 7 Landscape and Ecological Management Plan.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			The LVIA identifies where significant visual effects would occur and reports residual effects following mitigation. It concludes that visual effects associated with the Scheme, including the BESS, are localised and would reduce over time as mitigation planting establishes. The decommissioning of the Scheme has been assessed within the **ES [APP-052 to APP-265]** which considers the effects associated with decommissioning activities. As part of the assessment, appropriate mitigation measures are incorporated into the Scheme. Information on decommissioning activities is provided within the **ES [APP-052 to APP-265]** and within the **Outline Decommissioning Strategy [APP-279]**. The information is provided in accordance with the requirements of Part 1 of Schedule 4 of the EIA Regulations 2017 (as amended). Schedule 4 of the EIA Regulations 2017 (as amended) set out the information for inclusion in an ES. **ES Volume 1 Chapter 1 Introduction [APP-053]** Table 1-2 identifies where the requirements of Schedule 4 of the EIA Regulations 2017 (as amended) have been addressed. At the end of the Scheme's operational life, all Solar PV Sites, including BESS, would be decommissioned and the land restored to its original use and condition as far as practicable. There will be opportunities for the retention of a range of biodiversity improvements, including established habitats, hedgerows and woodland, beyond the decommissioning of the Scheme, ultimately enhancing the ecological value of the area. Measures to manage and minimise disruption during decommissioning are set out in the **Outline Decommissioning**

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Strategy [APP-279]. This explains how mitigation measures identified in the **ES [APP-052 to APP-265]** will be implemented during decommissioning and includes controls for working hours, noise, lighting, traffic management, pollution prevention, waste management and community liaison. The **Outline Decommissioning Strategy [APP-279]** also confirms that decommissioning activities will be undertaken in phases over an anticipated 12–24-month period, with measures to coordinate traffic movements, control noise and vibration in accordance with best practicable means and manage temporary lighting to minimise effects on nearby receptors. A detailed Decommissioning Strategy will be prepared substantially in accordance with the **Outline Decommissioning Strategy [APP-279]** and must be submitted to and approved by the relevant local planning authority prior to the commencement of decommissioning. This is secured through Requirement 20 in Schedule 2 of the **Draft Development Consent Order [APP-016]**.
CLNF-010	Hydrology, Flood Risk and Drainage	Flooding and Water Supply 10.1 Local road networks, including Hullavington to Norton road, Stanton St Quinton to Corston road, Norton to Sherston road, and Pig Lane, currently suffer severely from regular flash flooding and surface water runoff from surrounding fields, frequently rendering them impassable. Extensive evidence of these events exists. 10.2 Personal experience irrefutably demonstrates significant localized flooding from field runoff, critically impacting local access. 10.3 The two-year construction period, involving extensive ground disturbance,	The Applicant acknowledges that local roads and land within the area experience surface water flooding under baseline conditions and does not dispute residents' experience of flash flooding during recent storm events. Flood risk has been assessed in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [APP-063]** and the supporting Flood Risk Assessment and Drainage Strategy suite **[APP-210 to APP-218]**, including consideration of construction-phase mechanisms and climate change allowances for both peak river flows and peak rainfall intensity. The assessment concludes that the Scheme would not increase flood risk elsewhere, including downstream settlements such as Malmesbury, Chippenham and Melksham, subject to embedded mitigation and the control framework secured through the Draft Development Consent Order.

Reference	Theme	Comments/Issues Raised	Applicant's Response
		will undoubtedly exacerbate existing flood risks across all sections. The introduction of numerous large tracking and fixed solar panels will inevitably increase the speed of surface water runoff, thereby significantly heightening flood risk. The developer has failed to provide sufficiently clear details on the exact specification and placement of solar panels, which precludes a thorough and accurate assessment of their impact on surface water runoff. 10.4 Approximately 27 local properties, including the submitter's, depend entirely on private borehole water supplies. Profound concerns exist regarding the catastrophic potential impact of continuous vibration from construction and operational activities on the quality and sustainability of these vital water sources. 10.5 The unprecedented scale of this solar landscape in this specific rural context means there is no existing precedent to reliably ascertain the actual impact on groundwater resources and boreholes. This area must not be used as an experimental site. 10.6 The potential for increased runoff and altered hydrological patterns will have severe and wide-ranging implications, inevitably contributing to significantly increased flood risk in downstream areas including Malmesbury, Chippenham, and Melksham, particularly given that the proposed grid connection point at Melksham is already identified as a	The Applicant does not agree that the introduction of solar PV arrays would inevitably increase the speed or volume of surface water runoff. The operational drainage approach distinguishes between panelled areas, where rainfall drains to ground beneath and between elevated arrays, and supporting infrastructure such as substations and BESS, where runoff is managed through engineered and controlled drainage systems. This is consistent with NPS EN-3 paragraph 3.10.75, which recognises that ground-mounted solar PV generally drains to ground and does not create significant drainage impacts where ground cover is maintained. Peer reviewed research (including Cook and McCuen, 2013, and subsequent studies) demonstrates that maintained vegetated ground cover beneath arrays does not result in material increases in runoff volume or peak discharge, and that soil compaction and bare ground, rather than panel presence alone, are the principal drivers of increased runoff response. Construction-phase risks arising from ground disturbance, temporary works and potential compaction are assessed in Chapter 11 and controlled through the **Outline Construction Environmental Management Plan [APP-277]**, secured by the **Draft Development Consent Order [APP-016]**, including measures for temporary drainage, protection of existing land drainage, soil management, reinstatement and pollution prevention. On this basis, the assessment does not identify a mechanism by which the Scheme would materially exacerbate existing road flooding. Concerns relating to private borehole supplies and groundwater protection are addressed in **Environmental Statement Volume 1, Chapter 19 Ground Conditions [APP-071]**, which assesses aquifers, Source Protection Zones and potential pollutant linkages. The Scheme does not require operational abstraction and is assessed on the basis that it would not adversely affect groundwater availability

Reference	Theme	Comments/Issues Raised	Applicant's Response
		significant flood-prone area. 10.7 The flood risk and hydrological studies presented to date are demonstrably insufficient and woefully inadequate to accurately model the full implications of the proposed development. 10.8 Critical concerns remain unresolved regarding th e detailed plans for water supply for fire suppression at the BESS, including storage on site. Furthermore, comprehensive details on the collection and containment of contaminated wastewater post-fire incident are entirely lacking. This is absolutely critical to prevent widespread contamination of local and wider water supplies, particularly given the reliance on boreholes and the area's designation as a major water source. 10.9 The site's location above one of the major water sources for the South West underscores the paramount importance of robust contamination prevention measures, which are conspicuously absent and inadequately detailed within the proposal. 10.10 Relevant Policy: NPS EN-1 Section 5.10 (Water Quality and Resources, Flood Risk) requires applicants to assess flood risk and propose mitigation, ensuring development is safe and does not increase flood risk elsewhere. It also demands assessment of impacts on water quality, abstraction, and groundwater resources. The developer has	or create new contaminant pathways, with construction controls secured through the CEMP process. The Applicant considers that the flood risk and hydrological assessments are proportionate, policy aligned and technically robust, and that the Scheme complies with the requirements of NPS EN-1, the NPPF and relevant Wiltshire Core Strategy policies in demonstrating that development would be safe for its lifetime and would not increase flood risk elsewhere.

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		demonstrably failed to meet these requirements. 10.11 Relevant Policy: NPPF Chapter 14 (Meeting the challenge of climate change, flooding and coastal change) emphasizes avoiding inappropriate development in areas at risk of flooding, directing development away from highest risk areas, and promoting Sustainable Drainage Systems (SuDS). This proposal contradicts these principles. 10.12 Relevant Policy: Wiltshire Core Strategy Policy 42 (Standalone Renewable Energy Installations) requires that proposals consider flood risk. The consideration provided is manifestly insufficient. 10.13 Relevant Policy: Wiltshire Core Strategy Policy 46 (Flood Risk and Water Management) requires development to demonstrate it does not increase flood risk and incorporates SuDS, and protects water quality. This proposal fails to provide any credible assurance of meeting these demands.	
CLNF-011	Socio-Economics, Tourism and Recreation	Property Values 13.1 Market analysis conclusively demonstrates a strong expectation of devastating devaluation for properties located near large-scale solar/BESS and electrical infrastructure, comparable to the severe and proven impact associated with electricity pylons. 13.2 Concerns are grave that the developer's visibility radius modeling grossly understates the	The Applicant notes the concerns around the impacts on property prices and confirms that this matter has been scoped out of the assessment, a position agreed upon by the Planning Inspectorate in the EIA Scoping Opinion as set out in the **Consultation Report Appendix B: EIA Scoping [APP-024]**. The Scheme has been designed to minimise direct impacts on residential properties by offsetting a minimum of 50m between the property boundaries of any residence or residential areas and where solar panels & associated infrastructure are to be placed as set out

Reference	Theme	Comments/Issues Raised	Applicant's Response
		visual impact by allegedly using 1 km instead of 2 km for line-of-sight calculations. This constitutes a deliberate misrepresentation of impact. 13.3 A nearby bungalow near a Grade I building is reportedly unsellable due to the proposal, a clear indicator of immediate blight. 13.4 The Grade I building itself is considered to have no immediate marketability. 13.5 Farleaze Farm (Grade II listed) is expected to face significantly reduced saleability, impacting livelihoods. 13.6 Fox Cross has reportedly suffered a devastating value reduction from £2.5m to £1.75m due directly to project-related blight. 13.7 Personal homes are estimated to face catastrophic undervaluation exceeding 30%, with similar severe impacts anticipated across the entire region. Action Items and Demands 17.10 Document property value impacts with local comparables (including the Fox Cross case) and prepare a comprehensive and fair compensation framework proposal.	in **Section 2.2.1,Table 2-1 of ES 7.4 Design Principles and Parameters [APP269]**. Furthermore, the Applicant has implemented further offsets where appropriate to protect long term privacy and amenity for residential properties. To acknowledge the comments raised around property prices, the Applicant considers there is a lack of empirical evidence to suggest that solar farms result in significant long-term adverse effects on property values. While there have been studies from the USA and Netherlands, they indicate that external factors, such as broader property market trends, are more influential drivers of property price fluctuations. Furthermore, the Applicant points to a need to differentiate between potential short-term impacts on property saleability ie. during a construction peak, and the maintained long-term value once the Scheme is operational and scenarios such as the planned landscape mitigation have matured. The Applicant notes that consent has not been given to the Scheme, and therefore no construction or operational phase has taken place. The potential effects of the Scheme on listed buildings and other built heritage assets are assessed in **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, supported by **ES Volume 3, Appendix 12-1: Heritage Statement [APP-219]**. The assessment identifies baseline heritage assets, considers their significance, and evaluates likely effects during construction, operation and decommissioning, including effects on setting. The assessment concludes that no direct physical impacts to listed buildings are required to facilitate the Scheme. Any identified effects on listed buildings are indirect and relate to changes in elements of their setting that contribute to their significance. After mitigation, residual effects to the setting of the listed buildings range between Neutral and Minor/Moderate Adverse, and therefore not

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			significant (see **Volume 3, Appendix 12-8 Cultural Heritage Impact Assessment Tables [APP-232]**). The Applicant notes that the approach to the assessment in relation to heritage assets (including designated assets) has been agreed with Historic England and Wiltshire Council and is set out in the relevant Statements of Common Ground to be submitted at Deadline 1. Embedded mitigation measures to avoid or reduce harm are set out in Section 12.9 of **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**.
CLNF-012	Socio-Economics, Tourism and Recreation	Local Economy and Tourism 14.1 The region serves as a vital gateway to the Cotswolds, with established and cherished routes from Junction 17-18 to Tetbury, Malmesbury (the oldest borough), Nailsworth, and the Stroud valleys. 14.2 There are overwhelming concerns that the visitor experience will be irrevocably destroyed, leading to a catastrophic diminished perception of the landscape quality and the appeal of cycling routes. 14.3 Businesses such as cafes, restaurants, Hotels, golf courses and pubs are expected to suffer severely during construction and beyond due to the unacceptable visual impact of 4.5-metre panels, motors, and the overall industrial mass of the development. 14.4 While acknowledging the need for renewable energy, serious questions are raised regarding the true efficiency of solar generation in the UK (ranked	Likely significant effects of the Scheme on tourism and recreation, including to the Cotswolds National Landscape, have been assessed in **ES Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** and supporting **ES Volume 3 Appendix 16-2 Tourism and Recreation Receptor Tables [APP-241]**. No significant effects are anticipated: the Applicant has assessed that there is a likely worst-case temporary loss of 50 FTE tourism industry jobs as a result of the Scheme. This accounts for less than 0.7% of tourism-based employment within 5 km of the Scheme (BRES, 2023 data), and approximately 0.17% of tourism employment across Wiltshire (29,000 estimate from Visit Wiltshire, 2021). Additional mitigation measures have been secured through the **Outline Construction Traffic Management Plan (oCTMP) [APP-287]**, **Outline Public Rights of Way and Permissive Paths Management Plan [APP-282]** and the OSSCEP **Outline Skills, Supply Chain and Employment Plan [APP-285].** Together these seek to reduce these losses to tourism through mitigating traffic impacts, impact to PROWs, and focussing on local recruitment, promoting local suppliers where practicable, and through providing retraining opportunities for workers tourism-dependent industries. These measures are secured by the relevant requirements in Schedule 2 to the **Draft DCO [APP-016]**.

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		approximately 209th globally) and the long-term viability of this technology. There is a strong belief that it will be superseded by cleaner, more effective energy solutions within 10-15 years, rendering this project obsolete. 14.5 Questions are forcefully raised about the ultimate beneficiaries and the grossly exaggerated local economic benefits of the project, with compelling concerns that it will primarily benefit overseas interests and that claims of local job creation are nothing more than a farce. 14.6 Relevant Policy: NPS EN-1 acknowledges the potential for socio-economic impacts and demands these to be assessed, including impacts on tourism and local businesses. The developer's assessment is fundamentally flawed and fails to address the devastating negative impacts. Action Items and Demands 17.11 Prepare a thorough and independent tourism and local business impact assessment, including projected visitor declines and robust mitigation options for cafes, pubs, and cycle routes.	The **oCTMP [APP-287]** includes measures to manage deliveries, such as a booking system, restricted hours of deliveries and specified routes to minimise any detrimental impacts on the local highway network. A final CTMP will be prepared for each site, specifying the construction routes to be used by construction traffic. This is secured by Requirement 15 in Schedule 2 to the **Draft DCO [APP-016]** and is enforceable. An assessment of landscape and visual effects are presented in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**. The Landscape and Visual Impact Assessment (LVIA) assesses effects on identified landscape and visual receptors, including residential properties, users of public rights of way and roads, and identifies where significant effects may occur. The LVIA found no significant long term visual effects to residential properties as a consequence of the Scheme. Mitigation measures to address landscape and visual effects are set out in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**, **Figure 3-4-1 to 3-4-5.2 Landscape and Ecology Mitigation Plan [APP-084]** and secured within the **Outline Landscape and Ecological Mitigation Plan (LEMP) [APP-283]** and the **Outline Ecological Protection and Mitigation Strategy (EPMS) [APP-284]**. These documents include proposals for new and enhanced planting, retention of existing hedgerows and woodland, and landscape integration measures to reduce visual effects over time. The preparation, approval and implementation of detailed landscape and ecological management plans, substantially in accordance with the **OLEMP [APP-283]** and **EPMS [APP-284]**, are secured through requirements in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that the identified mitigation measures are delivered and maintained throughout the lifetime of the Scheme. 14.4 Solar energy is at the heart of the Clean Power 2030 Mission (January 2026 revised NPS EN-3, Para 2.10.2) and it is the

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Government's view that a secure, reliable, affordable, net zero consistent system in 2050 is likely to be composed predominantly of wind and solar (NPS EN-1, Para 3.3.20). Sunlight, the input energy source for solar, is abundant, predictable, renewable, low carbon and free. Figure 16 of the **Statement of Need [APP-266]** and related text (Section 7.4) demonstrates that there are many viable areas of solar irradiation in the UK. Figures 28 and 29 of the Statement of Need and related text (Section 8.5) demonstrate that a multi-technology approach to electricity supply, including solar, can reduce the effects of weather variability on output and is capable of closely matching a future projection of national electricity demand on a month-average level. The inclusion of a Battery Energy Storage System as part of the Scheme will enable energy generated by the Scheme to be stored and exported to the grid when it is needed, which will provide flexibility and improve grid reliability. Finally, that other countries may experience higher solar irradiation levels than the UK, means that they too could pursue solar generation to support their climate change plans. However, any such statistic cannot be used to demonstrate that solar in the UK does not work or should not be pursued. Government policy is clear that solar should be pursued in the UK with urgency because of the significant benefits it will bring to the UK energy system, consumers and to help meet UK clean power targets.
CLNF-013	Construction and Decommissioning	Project Sustainability and Ethical Sourcing Concerns 15.1 The overall "*green credentials*" of this project are fundamentally flawed and highly questionable. Given the extensive environmental impacts anticipated, there are profound doubts as to whether the project will achieve a carbon payback within its entire lifetime, thereby negating any claim of net environmental benefit. 15.2 The source of the solar panels, highly likely to be from China, has not been clearly stated. Absolute clarity is	Island Green Power is part of the Solar Energy UK Supply Chain Commitment, which binds the Applicant to ensuring that our supply chains are free of slavery. As part of this, the solar sector in the UK and Europe has launched the Solar Stewardship Initiative, which independently inspects and certifies individual factories for sustainable and ethical practices. The Applicant would expect to source our panels from factories that are SSI-accredited, free from issues such as modern slavery as the respondent requests. The effects of emissions generated from embodied carbon within products to be used on site (as well as construction, operation and decommissioning emissions) are all considered in **ES Volume 1,**

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		demanded regarding the manufacturing locations and the sourcing of raw materials. 15.3 Extremely serious concerns are raised regarding the high potential for unethical sourcing, including the abhorrent use of forced labour in the supply chain. Comprehensive explanations and robust, legally binding undertakings are imperatively required from the developer to demonstrate unequivocally that all components are ethically sourced and comply with international human rights standards. 15.4 Relevant Policy: While specific planning policies on ethical sourcing are less explicit, NPS EN-1 requires assessment of socio-economic impacts and broader sustainability considerations. The examination process for NSIPs must consider wider national policy objectives, including the UK's unwavering commitment to combat modern slavery and promote ethical supply chains. Action Items and Demands 17.14 Provide a comprehensive and independently verified assessment of the project's carbon payback and overall environmental benefits, including embodied carbon considerations. 17.15 Provide clear, legally binding statements and undertakings regarding the ethical sourcing of all project components, including detailed supply chain	**Chapter 7: Climate Change [APP-059].** The CO2e figures are included in detail within the chapter, which concludes that, while emissions are associated with the manufacture and construction of the Scheme, these are outweighed over time by the carbon savings achieved through the displacement of fossil fuel-derived electricity generation. When considered over its operational lifetime, the Scheme would result in a net reduction in GHG emissions compared to a 'without Scheme' scenario and would make a meaningful contribution to the UK's legally binding carbon budgets and transition to net zero. The **ES [APP-052 to APP-265]** and environmental and ecological surveys have been undertaken by competent experts with considerable experience assessing similar schemes. Details of qualifications, experience and professional institute membership are provided within **ES Volume 3, Appendix 1-1 Statement of Competence [APP-180]**.

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		transparency, to unequivocally address concerns about forced labour and other unethical practices.	
CLNF-014	Description and DCO Process	Action Items and Demands 17.13 Provide transparent and comprehensive information on the exact specifications, layout, and placement of all solar panels, trackers, and associated infrastructure to facilitate accurate impact assessments.	The Applicant confirms that it has provided transparent and comprehensive information in the Environmental Statement which sets out worst-case scenarios including the design parameters and locations for the solar panels and associated infrastructure. The impact assessments are informed using the "Rochdale Envelope" approach, which is an industry standard for Nationally Significant Infrastructure Projects, and defines the maximum envelope of the Scheme's parameters and design optionality. As established in the **Statement of Need [APP-266],** this approach allows the Applicant to secure necessary design flexibility to incorporate technological innovation and improvements, such as more efficient solar panel models, that may be available at the time of construction. A full description of the Scheme and its associated physical parameters are provided in **Table 3-1** of **ES Chapter 3: The Scheme [APP-055],** and throughout **Section 2: "Design Parameters and Commitments" of 7.4: Design Principles and Parameters [APP-269]** where details of the technical specifications and maximum dimensions used to inform these worst-case scenarios for the environmental assessment are set out.
CLNF-015	Landscape and Visual	1.4 Relevant Policy: Wiltshire Core Strategy Policy 51 (Landscape) mandates that development must protect, conserve, and enhance Wiltshire's distinctive landscape character. This proposal fails to adhere to this requirement, as it contradicts the Wiltshire Landscape Character Assessment.	An assessment of landscape and visual effects is provided in the Landscape and Visual Impact Assessment (LVIA) presented in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**. The LVIA assesses effects on identified landscape and visual receptors, including residential properties and users of public rights of way, and identifies where significant effects may occur. The proposed mitigation is sensitive to the existing landscape and has been informed by the Landscape Character Assessment Guidelines

Reference	Theme	Comments/Issues Raised	Applicant's Response
			as set out in **ES Volume 3, Appendix 8-4 Landscape Character Area Descriptions [APP-195]** and Wiltshire's Nature Recovery Strategy to protect and enhance the landscape . The proposals and the defining legacy of the landscape would be the robust framework of features that have improved through the mitigation and landscape enhancements embedded within the Scheme. This mitigation in turn would give rise to long-term wider benefits, including maintaining and enhancing biodiversity and in promoting the resilience of ecosystems. The comprehensive package of habitat creation and enhancement measures are shown in **ES Volume 2, Figure 3-4: Landscape and Ecological Mitigation Plan [APP-084]** and detailed in the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]**. The preparation, approval and implementation of the detailed Landscape and Ecological Management Plan, substantially in accordance with the **OLEMP [APP-283]**, are secured through Requirement 7 in Schedule 2 of the **Draft Development Consent Order [APP-016]**, The Applicant considers that although there are some short-term significant effects to the character of the landscape due to the change in land use caused by the infrastructure, there would also be permanent beneficial effects to the fabric of the Site as a result of the embedded mitigation measures which would contribute positively to the legacy landscape and be in line with Core Policy 51 and Wiltshire's Nature Recovery Strategy.
CLNF-016	Other Environmental Matters Description and DCO Process	Battery Energy Storage System (BESS) 11.1 The technology choice is a proposed chemical BESS, which is critically contrasted with alternative sand-based systems reportedly used elsewhere in Europe for superior safety reasons. The	As set out in the **oCTMP [APP-287]** pre-construction, interim and post-construction Road Condition Surveys will be undertaken to repair any damage caused to verges during the construction period. The details of these surveys will be confirmed as part of the Final CTMP.

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		developer has failed to justify this inferior choice. 11.2 The stated primary purpose is unequivocally characterized as arbitrage trading for profit, not directly contributing to energy generation or security of supply in the immediate vicinity. This undermines the public benefit claims. 11.3 The proposed scale of the BESS is unprecedented for the area, raising grave concerns about its regulation, proven safety record at this scale, and the catastrophic potential for significant consequences. 11.4 Proximity risks are unacceptably high and considerable, with the site being adjacent to a major railway, near a Grade I listed building, close to new housing, within 650 metres of a livery, and 800 metres of a stud. 11.5 The need for government-underwritten insurance is absolutely paramount to cover residents, animals, livelihoods, and health in the inevitable event of an incident. 11.6 Emergency access via the back lane between Hullavington and Sherston over the railway bridge is demonstrably unsafe and critically inadequate. 11.7 Prior livery planning conditions mandated left-turn only due to lane constraints, and fire service access via these routes is evidently insufficient for the scale of potential emergency, posing an unacceptable public safety risk. 11.8 Relevant Policy: NPS EN-1 (Overarching Energy) explicitly requires	The Applicant has followed National Fire Chiefs Council (NFCC) guidance and commissioned a Plume Assessment Study to model toxic gas emissions and visibility impacts from a BESS fire on all sensitive receptors within a 1km radius of the BESS area. The fire emissions modelled in the report were based upon recent UK Health Security Agency (UKHSA) requests for DCO BESS projects which explore both immediate air quality impacts together with annual UK air quality requirements. The UKHSA is a statutory consultee for the Scheme and has confirmed that they are satisfied with the Applicant's submitted documentation and Plume Assessment Study methodology and results. Six worst case BESS fire locations (i.e. locations within the BESS Area closest to sensitive receptors) have been modelled as depicted in **ES Volume 2, Figure 15-5: Battery Energy Storage System Fire Emissions Study Area [APP-166]**. The concentrations of carbon monoxide (CO), formaldehyde, hydrogen chloride (HCl), hydrogen cyanide (HCN), hydrogen fluoride (HF), ammonia (NH_3), nitrogen dioxide (NO2) and particulates from a potential BESS fire have been modelled using an air quality dispersion model to determine the likely effects on human health. A high-level visibility assessment has also been undertaken using the modelled particulates results to determine the effect of BESS fire emissions on visibility on the local road and rail network to inform the **Outline Battery Safety Management Plan (OBSMP) [APP-286].** The Plume Assessment Study has concluded that there are no significant toxic emission or visibility impacts at all sensitive receptor locations. The emergency access is a secondary access and an alternative to the main access. It will be used very occasionally, and the road widths

Reference	Theme	Comments/Issues Raised	Applicant's Response
		the consideration of safety and the potential for accidents/disasters, particularly regarding new technologies and proximity to sensitive receptors. This proposal demonstrates a profound failure to adequately address these critical safety requirements. Action Items and Demands 17.6 Demand a complete BESS risk assessment and irrefutable justification for the chemical vs. sand-based storage technology choice; secure irrefutable evidence of compliance with fire service requirements. 17.7 Secure government-underwritten insurance commitments covering health, property, animals, and livelihoods in the event of BESS incidents or project harms.	are wide enough to allow access with very good forward visibility and low trafficked, making it suitable for emergency access. The Applicant has also committed to commissioning an additional Plume Analysis Study at the detailed design stage as stipulated in Section 5.5.9 of the OBSMP and secured through the DCO: "*..at the detailed design stage a BESS system and site specific Plume Analysis study will be conducted to assess the environmental impact of a site incident to sensitive receptors within a 1 km radius. Toxic gas emissions to sensitive receptors must be below relevant public health exposure limit guidelines when the battery system of a BESS is fully consumed (burnt out), production of Particulate Matter (PM) and a visibility impact assessment on any transport links within a 1 km radius of the BESS area will also be included. The ERP produced at the detailed design stage (template outlined in Section 5.4.9 -5.4.11) will incorporate all necessary emergency response procedures and actions based upon thermal runaway test data supplied by the BESS system provider*." An **Outline Battery Safety Management Plan (OBSMP) [APP-286]** has been prepared for the Scheme using guidance from Dorset and Wiltshire Fire and Rescue Service and incorporating recommendations of the National Fire Chiefs Council. The safety objectives for the design of the BESS site are listed in Section 2.4 of the OBSMP. The OBSMP will be amended at Deadline 1 to fully accommodate the latest BESS safety requirements contained in NFPA 855 (2026) ensuring that any credible risks associated with battery storage are either prevented or fully mitigated if a BESS failure occurs. Section 2.4.2 of the OBSMP stipulates that: *"Final BESS design and site layout will have been validated through mandatory Large Scale Fire Testing (LSFT) and rigorous consequence modelling to minimise the requirement for any D&WFRS intervention in a thermal runaway incident. LSFT must establish minimum equipment*

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			spacing distances that demonstrate there is no fire propagation to adjacent BESS enclosures or ESS equipment. D&WFRS intervention in worst case scenarios would typically be limited to boundary cooling of adjacent BESS and Energy Storage System (ESS) units to prevent the fire from spreading. This strategy will be finalised with D&WFRS and be clearly communicated in the Emergency Response Plan (ERP); *• To ensure that fire, smoke, and any release of toxic gases does not significantly impact site operatives, first responders, and the local community; and* *• To ensure that firewater run-off is contained and tested before release or, if necessary, removed by tanker and treated offsite."* As now mandated under NFPA 855 (2026), the Applicant will only be able to select a BESS system that has undertaken Large Scale Fire Testing (LSFT). At the detailed design stage, the selected BESS LSFT data will be leveraged to fully inform inputs for risk assessment tools which will be utilised together with detailed consequence modelling to provide a comprehensive site operations and emergency response safety audit, this is stipulated in the OBSMP pre-construction requirements (Section 6). Section 6.1.3 – 6.1.7 of the OBSMP defines key risk assessments and consequence modelling reports required by NFPA 855, NFCC guidance, and HSE BESS safety requirements. These risk assessment tools minimize BESS failure risks, mitigate BESS failure scenarios, and minimize fire propagation risks. Section 1.1.14 of the OBSMP stipulates: *"This document details the types of safety systems available on the market at present, along with risk reduction barriers which are likely to be incorporated into the system to be installed at Lime Down D. It is possible that by the time of construction that a new battery chemistry may be integrated but this would be fully tested and certified to the latest BESS safety standards and this will be reflected in the final BSMP approved by the*

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			relevant local planning authority in consultation with Dorset and Wiltshire Fire and Rescue Service (D&WFRS) and the Environment Agency (EA)." As set out in the OBSMP, the BESS Area will have a robust and validated Emergency Response Plan (ERP), developed in consultation with Dorset & Wiltshire Fire and Rescue Service at the detailed design stage. Section 5.4 of the OBSMP specifies the typical emergency response protocols, procedures and safety information that will be included in ERPs. ERPs will be drafted and approved for all stages of the Scheme, including construction, operation, and decommissioning. The Applicant's ERP template includes all requirements specified in both NFCC and NFPA 855 guidance and recommendations. Section 5 of the OBSMP covers all requisite firefighting requirements for the Scheme including fire service access, firefighting water supply, and emergency planning requirements. The Applicant is in the process of agreeing a Statement of Common Ground (SOCG) with D&WFRS to provide assurance that all safety and emergency response requirements are fulfilled. Site design ensures that D&WFRS would not have to travel or operate in a smoke plume / vapour cloud. The Applicant is currently drafting a Statement of Common Ground (SOCG) with the Environment Agency (EA) on Scheme environmental protection issues including the BESS area drainage strategy. The agreed strategy document will be appended to the OBSMP at Deadline 1, to provide further assurance that all water pollution risks from a BESS fire are fully mitigated. The EA is a statutory consultee for the OBSMP and drainage strategies and must approve the final BSMP and drainage design at detailed design before construction of the BESS commences.

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			The **OBSMP [APP-286]** is secured through Requirement 6 (Battery safety management) in Schedule 2 of the **Draft DCO [APP-016]**, which provides that Work No. 2 must not commence until a Battery Safety Management Plan has been submitted to and approved by the relevant planning authority. The approved plan must be substantially in accordance with the Outline Battery Safety Management Plan. The Draft DCO also requires the relevant planning authority to consult with Dorset and Wiltshire Fire and Rescue Service and the Environment Agency before determining the application, and that the Battery Safety Management Plan must be implemented as approved.
CLNF-017	Noise and Vibration Ecology and Biodiversity Construction and Decommissioning Cultural Heritage	Key Assertions and Conclusions 16.1 The core conclusion is that the project is demonstrably unfit for purpose due to insurmountable and substantial concerns regarding heritage harm, ecological loss, unacceptable noise and vibration impacts, catastrophic transport and logistics failures, profound safety risks associated with the BESS, critically weak decommissioning safeguards, devastating property blight, severe adverse economic effects, and grave questions regarding its overall sustainability and ethical sourcing. 16.2 Precedent claims highlight an absolute lack of directly comparable UK precedent for a project of this exact nature and scale, which renders developer assurances entirely baseless and unfounded. 16.3 A clear and absolute cancellation threshold is demanded, establishing specific and non-negotiable parameters and commitments	The Applicant does not agree that the project is unfit for purpose. Detailed responses to the queries raised in this conclusion have been provided in the responses above in Sections 1-15 raised by the respondent.

Reference	Theme	Comments/Issues Raised	Applicant's Response
		that if logistics and traffic, or other critical environmental, safety, and heritage criteria, are not unequivocally met, the project must be cancelled without hesitation. Action Items and Demands 17.12 Establish and agree binding cancellation criteria tied to logistics/traffic performance and environmental, safety, and heritage thresholds.	

6.24 Jane Andrews

Table 6-24 RR-2095

Reference	Theme	Comments/Issues Raised	Applicant's Response
JAS-001	Site selection and Alternatives	I feel very strongly that such a project on an industrial scale such as this is inappropriate in this area. Using farmland instead of rooftops or already designated brownfield sites is not environmentally friendly. Land is precious and cannot be replaced. Wildlife will be impacted as will the people who live, work and enjoy this beautiful part of the countryside	Use of Agricultural Land An assessment of the likely significant effects of the Scheme on soils and agricultural land is provided in **ES Volume 1, Chapter 17: Soils and Agriculture [APP-069]**. This chapter considers baseline agricultural land quality, including Best and Most Versatile (BMV) land, and assesses likely significant effects arising from construction, operation and decommissioning of the Scheme, together with embedded mitigation measures. The areas of each Agricultural Land Classification (ALC) grade affected by the Scheme are set out in Section 17.7 of **ES Volume 1, Chapter 17: Soils and Agriculture [APP-069]**. Of the agricultural land within the Solar PV Sites, approximately 477.4 hectares (around 67%) is classified as Subgrade 3b or Grade 4 and is therefore not BMV land. There is no Grade 1 land, around 30.8 hectares (approximately 4%) of Grade 2 land, and approximately 209.3 hectares (around 29%) of Subgrade 3a land. The distribution of ALC grades is shown in **ES Volume 2, Figure 17-2: Agricultural Land Classification Mapping [APP-172]**. The Applicant has had regard to agricultural land quality in the design and site selection process and has sought, where practicable, to locate infrastructure on lower quality land. The Scheme will result in a temporary but long-term and reversible loss of agricultural land for the operational life of the Scheme. As set out in Section 17.10 of **ES Volume 1, Chapter 17: Soils and Agriculture [APP-069]**, this gives rise to a temporary, long-term moderate adverse effect on agricultural land overall, and a temporary, long-term major/moderate adverse effect on BMV land, both of which are assessed as significant. These effects are fully reported in the ES and are a matter for the Secretary of State to weigh in the planning balance against the need for the Scheme and its wider benefits. There are no significant permanent effects on agricultural land, as all land will

Reference	Theme	Comments/Issues Raised	Applicant's Response
			be returned to its original use and condition as far as practicable following decommissioning. The Applicant notes that the approach to assessing the quality of the agricultural land is being discussed with Natural England and is set out in the relevant **Statement of Common Ground** to be submitted at Deadline 1. Measures to avoid and minimise effects on soils and agricultural land are embedded within the Scheme design and secured through the DCO. These include the preparation and implementation of a **Soil Resources Management Plan (SRMP) [APP-280]**, which will control soil handling, storage and reinstatement during construction, operation and decommissioning, and a requirement to prepare and implement a Decommissioning Strategy in accordance with the **Outline Decommissioning Strategy [APP-279]**. Through the establishment and maintenance of long-term grassland beneath and between the solar arrays, soil health, quality and structure are anticipated to improve over the lifetime of the Scheme, resulting in a temporary, moderate beneficial effect on soil resources at decommissioning, which is assessed as significant (Sections 17.10 and 17.12 of **ES Volume 1, Chapter 17: Soils and Agriculture [APP-069]**). In relation to suggestions that brownfield land or alternative locations should be used, including rooftop, these matters are addressed in **ES Volume 1, Chapter 4 Alternatives and Design Evolution** and in the **Statement of Need [APP-056 and APP-266]**. The Applicant has considered alternatives, including previously developed land and other forms of solar deployment, as part of the site selection and design evolution process. As shown in Table 2-2 of **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]**, the Applicant has

Reference	Theme	Comments/Issues Raised	Applicant's Response
			considered previously developed land/brownfield land over 1 hectare within the area of search, based on the brownfield land registers of the relevant Local Planning Authorities, and concluded that none of the sites are large enough to provide a viable land parcel of at least 40 ha and sites were not considered to be available as they have planning permission for residential development and/or are allocated for residential/mixed use development. National policy and government guidance, as set out in the **Statement of Need [APP-266]**, recognise that while rooftop and smaller-scale solar installations are an important part of the energy mix, they cannot alone meet the scale of capacity required to achieve clean power and net zero objectives. Large-scale ground-mounted solar therefore remains necessary in addition to, not instead of, rooftop solar. <u>Ecology and Biodiversity</u> Likely significant effects of the Scheme on ecology and biodiversity are fully assessed in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**. This assessment considers baseline ecological conditions and evaluates likely significant effects arising during the construction, operation and decommissioning phases of the Scheme. It identifies avoidance, mitigation and enhancement measures to address potential impacts on habitats and protected and notable species. It also identifies opportunities for ecological enhancement, including the creation and long-term management of habitats, and delivery of biodiversity net gain. The assessment concludes that, with the identified embedded and additional mitigation measures in place, no unacceptable significant adverse effects on ecology and biodiversity are anticipated. The Applicant notes that the approach to the assessment in

Reference	Theme	Comments/Issues Raised	Applicant's Response
			relation to ecology and biodiversity in general is being discussed with Wiltshire Council and Natural England and is set out in the relevant **Statements of Common Ground** to be submitted at Deadline 1. During construction, specific measures are proposed to avoid disturbance and displacement of wildlife. These include protective buffers around sensitive habitats and features, timing restrictions on vegetation clearance, pre-construction ecological surveys, species-specific mitigation, and pollution prevention controls which are set out in the **Outline Ecological Protection and Mitigation Strategy (OEPMS) [APP-284]**. Measures to protect trees and hedgerows are also set out in **ES Volume 1, Chapter 10 Arboriculture [APP-062]**. The Scheme will also result in the cessation of intensive arable farming within the Solar PV Sites. As identified **in ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**, this is expected to reduce the ongoing application of herbicides and pesticides, supporting improvements in habitat quality over the operational lifetime of the Scheme. The reversion of existing arable land within the Solar PV Sites to predominantly grassland habitats can be expected to benefit a wide range protected and notable species, as identified in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**. Mitigation and enhancement measures are detailed in the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]** and the **OEPMS [APP-284]**, which set out habitat creation, species protection measures, buffer zones and long-term ecological management. The preparation, approval and implementation of the detailed Landscape and Ecological Management Plan, substantially in accordance with the **OLEMP [APP-283]**, are secured through

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Requirement 7 in Schedule 2 of the **Draft Development Consent Order [APP-016]**. The preparation, approval and implementation of the detailed Ecological Protection and Mitigation Strategy, substantially in accordance with the **OEPMS [APP-284]**, are secured through Requirement 8 in Schedule 2 of the **Draft Development Consent Order [APP-016]**. These requirements ensure that ecological protection and enhancement measures are delivered and maintained throughout construction and operation of the Scheme. Recreational Access and Human Health A detailed assessment of the likely significance of effects from the Scheme on the use and desirability of individual PRoWs and recreational access to the countryside is included in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** and **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]**. This assessment considers the impact on individual recreational routes, including their practical use, enjoyment and desirability. The Applicant confirms that the majority of significant adverse effects can be mitigated. However, some significant adverse effects to users of PRoW and unsurfaced roads in Lime Down E during construction cannot be mitigated further. No significant residual effects are anticipated during the operational phase of the Scheme. The assessment in **ES Volume 1, Chapter 18: Human Health [APP-070]** also considers the physical and mental health impacts of changes to recreation and countryside access under the assessment topic 'open space, leisure and play', and concludes that no significant adverse effects are anticipated at any phase of the Scheme. The Applicant confirms that existing PRoW are to be protected as far as practicable within the Scheme design, with management measures set out in the **Outline Public Rights of Way and**

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Permissive Paths Management Plan (oPROWPPMP) [APP-282], confirmed as embedded mitigation in Section 16.9 of **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]**. New permissive access routes have been incorporated into the Scheme design, shown as Work No. 10 on the **Works Plan [APP-007]** and illustrated on **ES Volume 2, Figure 3-4: Landscape and Ecology Mitigation Plan [APP-084]**. These are identified as additional mitigation and enhancement measures in Section 16.11 of **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]**. The PRoW and Permissive Paths Management Plan is secured through Requirement 16 of Schedule 2 of the **Draft Development Consent Order [APP-016]**. The preparation, approval and implementation of the detailed Construction Environmental Management Plan and Construction Traffic Management Plan, substantially in accordance with the outline plans, are secured through Requirements 13 and 15 respectively in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that impacts on PRoW and recreational routes are appropriately managed during construction. The approach to recreation and access has been discussed with Wiltshire Council's Public Health team and is under discussion with Wiltshire Council's Countryside Access Team and is set out in the relevant Statement of Common Ground to be submitted at Deadline 1**.**
JAS-002	Hydrology, Flood Risk and Drainage	I am very concerned about the already alarming issue of flooding in this area. It's clear from the experts this will only increase and impact many homes and businesses in the area. Due to the location of the site my	An assessment of the effects of the Scheme on flood risk both within the Site and the surrounding area is provided in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [APP-063]**, with supporting information provided in **ES Volume 3, Appendix 11-1 to 11-9: Flood Risk Assessment and Drainage Strategy [APP-210 to APP-218]**.

Reference	Theme	Comments/Issues Raised	Applicant's Response
		(Redacted) business will be adversely affected.	The assessment concludes that, with the embedded mitigation measures secured, the Scheme would not result in a material increase in off-site flood risk, including to adjacent communities and downstream receptors, and that any on-site flood risk would be managed such that the Scheme remains safe and operable for its lifetime. The assessment has been prepared in accordance with national policy and best practice guidance and in consultation with the Environment Agency and Lead Local Flood Authority and is set out in the relevant **Statement of Common Ground** to be submitted at Deadline 1. The **Outline Construction Environmental Management Plan (Outline CEMP) [APP-277]** has been developed to control construction-phase risks and ensure there is no material increase in off-site flood risk. In accordance with NPS EN-3 (paragraph 2.10.84), the assessment differentiates between solar PV panel areas, which drain to the existing ground and therefore do not generally give rise to significant drainage effects, and associated infrastructure (for example access tracks, temporary construction compounds, substations and the BESS) where runoff controls are required. Where drainage measures are necessary, these include permeable surfacing, infiltration features, swales and attenuation storage to manage surface water and maintain greenfield runoff behaviour, as applicable. Requirement 13 in Schedule 2 to the **Draft DCO [APP-016]** secures that part of the authorised development can commence until, a CEMP is submitted to and approved by the relevant planning authority. The CEMP must be substantially in accordance with the Outline CEMP, and all construction works associated must be carried out in accordance with the approved CEMP.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			An assessment of the likely effects of the Scheme on the local economy and employment is provided in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]**. This chapter considers potential impacts on construction and engineering sectors, agricultural activity, tourism-related businesses, and wider local economic conditions during construction, operation and decommissioning. Supporting evidence is provided in **ES Volume 3, Appendix 16-3: Socio-Economics, Tourism and Recreation – Summary of Non-Significant Effects [APP-242]**, which summarises that effects on the local economy and economic prosperity are assessed as negligible to minor beneficial, with construction expenditure and employment generation contributing positive, temporary effects on local economic activity. The assessment therefore concludes that the Scheme would not result in significant adverse effects on local businesses or the wider local economy, and that socio-economic benefits, including job creation and local supply-chain opportunities, are expected during the construction phase, with more modest economic and skills and supply chain opportunities during the operational phase. The Applicant notes that the approach to assessment of socio-economic effects has been agreed with Wiltshire Council's Economic and Regeneration Team, with the exception of matters relating to agricultural employment, which the Applicant is discussing with the team. This is set out in the **Statement of Common Ground with Wiltshire Council** to be submitted at Deadline 1.

6.25 James Gay

Table 6-25 RR-2041

Reference	Theme	Comments/Issues Raised	Applicant's Response
JG-001	Socio-Economics, Tourism and Recreation Noise and Vibration Cumulative Effects	Principal Grounds of Objection Disproportionate Impact on Residential Amenity (Redacted) is located between two proposed areas of solar development, resulting in a level of cumulative impact that is materially greater than that experienced by properties affected on only one side or at greater distance. The combined effects would include: - Loss of rural outlook and openness - Visual enclosure from multiple directions - Noise from inverters and associated infrastructure - Glint and glare affecting the dwelling and its setting - Prolonged construction disturbance followed by permanent operational impact Taken together, these impacts would result in a fundamental change to the residential environment that cannot be adequately mitigated. Scale and Cumulative Impact While the layout of the scheme has evolved, including the omission of land adjacent to my property, the proposal continues to result in significant cumulative impact at this location due to the scale of development and the	The Applicant confirms that the assessment of impacts to PROWs, unsurfaced roads, and the recreational use of the highway network during construction in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** and the supporting **ES Volume 3, Appendix 16-2 Tourism and Recreation Receptor Tables [APP-241]** take into account the construction duration, and the impact on accessibility to the PROW network and its desirability for users. The Applicant is confident that the majority of these are able to be mitigated so they are not significant adverse effects. This includes keeping PROWs open as much as possible during construction to ensure those who do use the PROWs are not physically hindered from doing so. Lordswood House, is identified as Receptor RI019 and has been fully assessed in ES Volume 3, Appendix 8-3-2-1-1: Visual Assessment Sheets (Non-Significant) [APP 190]. In response to consultation a significant number of fields were removed from the Scheme. As a result of the removal of panels in fields C20 the property is no longer has infrastructure on two sides. The assessment notes Moderate/ Minor effects during construction and Year 1 on views from the property as there would be filtered views from upper stories of construction of proposed infrastructure within Lime Down A. Construction activities would be visible in open views towards rising land in A10 and A9 due to limited intervening vegetation. A8 is located on an area of slightly lower landform between A10 and A9 and is not proposed for panels boundary of the receptor. The effects reduce to Minor Adverse by Year 15 as a result of the proposed mitigation.

Reference	Theme	Comments/Issues Raised	Applicant's Response
		relationship of multiple solar areas to my home. The harm arises not from any single parcel of land, but from the combined and reinforcing effects of the development as a whole.	
JG-002	Landscape and Visual	Reliance on Long-Term Landscape Mitigation The proposal relies heavily on landscape planting that may take many years to become effective. This approach fails to address: - Immediate harm from the outset of development - Winter visibility when deciduous planting provides limited screening - The need for mitigation to be effective from day one, not at some point in the future The reliance on long-term planting does not adequately mitigate the impacts on nearby residential properties.	The landscape and visual effects of the Scheme, including the effectiveness and phasing of proposed screening and planting, are assessed in the Landscape and Visual Impact Assessment (LVIA) presented in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**. The **LVIA [APP-060]** considers landscape and visual effects over time, including during the early years of the Scheme before planting is fully established, and identifies where significant effects may occur. NPS EN-1 recognises at para 5.10.5 that "*Virtually all nationally significant energy infrastructure projects will have adverse effects on the landscape, but there may also be beneficial landscape character impacts arising from mitigation*." Mitigation measures are detailed in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**, Figure 3-4-1 to 3-4-5.2 **Landscape and Ecology Mitigation Plan [APP-084]** and the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]**. Proposed planting comprises a mix of native species designed to enhance biodiversity and resilience, with planting design prioritising long-term effectiveness and landscape integration. The **OLEMP [APP-283]** sets out the approach to establishment, maintenance and management of planting to ensure its effectiveness over the lifetime of the Scheme. The LVIA includes verified viewpoints with both summer and winter photography to demonstrate year-round changes to the

Reference	Theme	Comments/Issues Raised	Applicant's Response
			landscape. Photomontages at Year 15 illustrate the effectiveness of established planting, while also demonstrating the intended retention of openness across the receiving landscape. Hedgerows on the western edge of fields within Lime Down C, which border the Cotswolds National Landscape, are proposed to be maintained at approximately 1.5 metres (or as existing if greater) to retain open views within the setting of the Cotswolds National Landscape. This management approach is set out in the **OLEMP [APP-283]**. The preparation, approval and implementation of the detailed Landscape and Ecological Management Plan, substantially in accordance with the **OLEMP [APP-283]**, are secured through Requirement 7 in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that mitigation planting and screening measures are delivered and maintained throughout the lifetime of the Scheme. With specific reference to the Lordswood House which is identified as Receptor RI019, the assessment in ES Volume 3, Appendix 8-3-2-1-1: Visual Assessment Sheets (Non-Significant) [APP 190] sets out the proposed mitigation to reduce long term effects. A green corridor is proposed along the southern boundary of boundaries of A10. Although this would have a limited effect initially and the level of change would remain Low. By Year 15 proposed the proposed planting would screen views of proposed infrastructure and integrate with the existing hedgerow vegetation. The level of change to views would reduce to Very Low with Minor Adverse effects..
JG-002	Cultural Heritage	Historic Environment, Archaeological Sensitivity and Landscape Character The proposed development lies within a landscape of recognised historic	The potential effects of the Scheme on cultural heritage, including archaeological assets dated to the Roman and medieval periods, are fully assessed in **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, supported by detailed technical appendices in **ES Volume 3, Appendices 12-1 to 12-7**

Reference	Theme	Comments/Issues Raised	Applicant's Response
		sensitivity associated with Roman-era activity and long-established historic land use in the Sherston, Alderton and Grittleton area. Archaeological interest in this part of north-west Wiltshire is not confined to designated or recorded assets but extends across the wider historic landscape. The omission of an adjacent field in the latest iteration of the scheme indicates that site-specific constraints exist in the immediate area, reinforcing the need for a precautionary approach to development at this scale. Given the extent of ground disturbance required for solar arrays, cabling, access tracks and associated infrastructure, there remains a risk of harm to below-ground archaeology and historic landscape character that has not been satisfactorily addressed through desk-based assessment or post-consent mitigation alone.	**[APP-219 to APP-231]**. The chapter considers baseline conditions, identifies built and archaeological heritage assets within the study area, and assesses likely effects during construction, operation and decommissioning, including effects on setting. The chapter concluded that, following mitigation, the residual effects on any archaeological assets including Roman and medieval period remains, would be neutral/negligible and therefore not significant (see **Volume 3, Appendix 12-8 Cultural Heritage Impact Assessment Tables [APP-232]**). The assessment is underpinned by extensive desk-based research, geophysical survey and evaluation trenching, as detailed in **ES Volume 3, Appendix 12-2: Archaeological Desk-Based Assessments [APP-220], Appendix 12-4: Archaeological Geophysical Survey Reports [APP-224], and Appendix 12-5: Interim Evaluation Trial Trenching Reports [APP-225].** The Applicant notes that the approach to the assessment has been agreed with Wiltshire Council and the methodology for the mitigation strategy is being discussed with Wiltshire Council and is set out in the relevant **Statement of Common Ground** to be submitted at Deadline 1. Embedded mitigation measures to avoid or reduce harm to heritage assets are set out in Section 12.9 of **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, with additional mitigation measures detailed in Section 12.11. An overarching archaeological mitigation strategy is provided in **ES Volume 3, Appendix 12-6: Outline Archaeological Mitigation Strategy [APP-230]**, which sets out the framework for further archaeological investigation, recording and protection where ground disturbance cannot be avoided. As set out in **ES**

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Volume 1, Chapter 4: Alternatives and Design Evolution Field C20 of Lime Down C was removed from the Scheme due to the presence of possible heritage assets. The preparation, approval and implementation of detailed archaeological Written Schemes of Investigation, substantially in accordance with the Outline Archaeological Mitigation Strategy, are secured through Requirement 12 of Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that appropriate protection, recording and mitigation are delivered before and during construction. <u>Landscape and Visual Impact</u> An assessment of landscape and visual effects are presented in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**. The Landscape and Visual Impact Assessment (LVIA) assesses effects on identified landscape and visual receptors, including residential properties, users of public rights of way and roads, and identifies where significant effects may occur. The visual effects of the Scheme are summarised in **ES Volume 3, Appendix 8-3-3 [APP-192]**. Temporary Major/Moderate and Moderate Adverse effects on visual receptors have been recorded across the Scheme during construction and at Year 1. However, for the majority of these receptors, the effects reduce to non –significant levels as a result of the embedded mitigation measures which are set out in Section 8.9 of **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]** and include landscape buffers, retention of existing hedgerows and woodland, and new planting to provide screening and integration over time. The LVIA found no significant long term visual effects to residential properties as a consequence of the Scheme.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			The assessment also identifies that there would be some long-term significant effects on the visual amenity of users of some localised footpaths, as a result of the Scheme. This predominantly relates to locations where footpaths diagonally cross fields and mitigation planting would be inappropriate to landscape character and the legacy landscape. Those receptors which would experience Significant Long Term Visual Effects are listed in Table 8-30 of the **LVIA [APP-060].** The scale of development within the Order Limits has been significantly reduced from the layout assessed in the Preliminary Environmental Information Report (PEIR) through an iterative design process undertaken in response to consultation and in accordance with the mitigation hierarchy to avoid, reduce and mitigate adverse effects. As part of this design evolution, panels along the edge of the Cotswolds National Landscape and along the Fosse Way have been removed. Mitigation measures to address landscape and visual effects are set out in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**, **Figure 3-4-1 to 3-4-5.2 Landscape and Ecology Mitigation Plan [APP-084]** and secured within the **Outline Landscape and Ecological Mitigation Plan (LEMP) [APP-283]** and the **Outline Ecological Protection and Mitigation Strategy (EPMS) [APP-284]**. These documents include proposals for new and enhanced planting, retention of existing hedgerows and woodland, and landscape integration measures to reduce visual effects over time. In addition, the Scheme design incorporates minimum offsets from existing landscape features, including residential properties, ancient woodland, woodland, hedgerows, public rights of way

Reference	Theme	Comments/Issues Raised	Applicant's Response
			and watercourses, to further limit visual impacts. Although these measures reduce the effects of the Scheme on nearly all receptors, as noted above there are 10 receptors which would experience Significant Visual Effects for the duration of the Scheme as set out Table 8-30 of the **LVIA [APP-060]**. Mitigation measures to address landscape and visual effects are set out in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**, **Figure 3-4-1 to 3-4-5.2 Landscape and Ecology Mitigation Plan [APP-084]**. The preparation, approval and implementation of detailed landscape and ecological management plans, substantially in accordance with the **OLEMP [APP-283]** and **EPMS [APP-284]**, are secured through requirements in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that the identified mitigation measures are delivered and maintained throughout the lifetime of the Scheme.
JG-003	Ecology and Biodiversity	Ecology and Wildlife Connectivity The surrounding countryside supports connected habitats and wildlife movement corridors, including hedgerows, woodland and rural lanes and byways. The scale and continuity of the proposed development, including fencing, lighting and ancillary infrastructure, risk: - Fragmentation of ecological networks - Disturbance to wildlife movement	<u>Fencing</u> Potential effects of boundary treatments and fencing on ecology and wildlife movement are assessed in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**, which considers impacts on habitats and species during construction, operation and decommissioning and identifies measures to avoid or mitigate barriers to wildlife movement. The Scheme design incorporates fencing around the Solar PV Arrays that is permeable to wildlife, with the exception of deer. This means animals (excluding deer only) will be able to freely access habitats within the Solar PV Sites without the need

Reference	Theme	Comments/Issues Raised	Applicant's Response
		- Harm from lighting, glint and glare These impacts would be cumulative and long-term.	for wildlife gates. In addition, wide buffers are retained around the peripheries of the Solar PV Sites to allow wildlife, including deer, to move between favoured habitats. These measures are described in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]** and detailed in the **Outline Ecological Protection and Mitigation Strategy (OEPMS) [APP-284]**. Fencing will be subject to regular inspection and maintenance to ensure continued permeability to wildlife and effective functioning over the lifetime of the Scheme. Measures for ongoing ecological management and maintenance are set out in the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]**. The preparation, approval and implementation of the detailed Ecological Protection and Mitigation Strategy and Landscape and Ecological Management Plan, substantially in accordance with the **OEPMS [APP-284]** and **OLEMP [APP-283]**, are secured through Requirements 8 and 7 respectively in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that fencing design and maintenance measures are delivered and maintained throughout the lifetime of the Scheme. <u>Lighting</u> Potential effects relating to lighting are considered within the LVIA in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**, which considers the implications of construction, operational and decommissioning lighting on landscape and visual receptors. No significant effects of lighting, above those recorded for landscape and visual receptors, were recorded.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			The Landscape and Visual Impact Assessment (LVIA) has considered the construction, operational and decommissioning lighting proposals for the Scheme, with details of lighting design, directionality and intermittent lighting set out in **ES Volume 1, Chapter 3: The Scheme [APP-055]**. The Scheme has been designed to minimise the need for external lighting. Lighting is not required within the Solar PV Arrays during the operational phase. Motion-sensing security lighting will be provided within substations and the BESS Area and will be used only for maintenance and security purposes. Temporary site lighting during construction and decommissioning will be required to enable safe working during hours of darkness. This lighting will be designed, as far as reasonably practicable, to minimise light spill outside the Site and Cable Route Corridor, particularly towards residential properties, highways and ecological receptors. Standard good practice measures will be employed to minimise glare and light spill during construction, operation and decommissioning. There will be no lighting on perimeter fencing. The mitigation measures to control construction lighting stated above are secured within the **Outline Construction Environmental Management Plan [APP-277]**, and operational lighting controls (also referenced above) form part of the **Outline Operational Environmental Management Plan [APP-278]**. The preparation, approval and implementation of detailed management plans, substantially in accordance with these outline plans, are secured through requirements in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring lighting impacts are appropriately controlled throughout the lifetime of the Scheme.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Glint and Glare An assessment of glint and glare effects arising from the Scheme is provided in **ES Volume 1, Chapter 20: Other Environmental Matters [APP-072]**, Section 20.5: Glint and Glare. The assessment considers potential effects on surrounding receptors, including road and rail users, residential properties, public rights of way, aerodromes and sensitive viewpoints within the Cotswolds National Landscape. The assessment concludes that, with embedded mitigation measures, including the use of fixed-tilt panels at a maximum height of 2.5 metres where required, no significant glint or glare effects are predicted to occur as a result of the Scheme
JG-004	Soils and Agriculture	Loss of Productive Agricultural Land The land proposed for development has been actively farmed for food production for decades, supported by ongoing agricultural management and soil improvement practices. While parts of the site are described by the applicant as lower-quality farmland, this does not reflect its continued productive use. The long-term loss of a substantial area of working agricultural land raises legitimate concerns regarding food production, land stewardship and cumulative impact, particularly at the scale proposed. Given the availability of alternative	An assessment of the potential effects of the Scheme on soils and agricultural land is provided in **ES Volume 1, Chapter 17 Soils and Agriculture [APP-069]**. This chapter considers baseline agricultural land quality, including Best and Most Versatile (BMV) land, and assesses likely significant effects arising from construction, operation and decommissioning of the Scheme, together with embedded mitigation measures. The areas of each Agricultural Land Classification (ALC) grade affected by the Scheme are set out in Section 17.10 of **ES Volume 1, Chapter 17: Soils and Agriculture [APP-069]**. Of the agricultural land within the Solar PV Sites, approximately 477.4 hectares (around 67%) is classified as Subgrade 3b or Grade 4 and is therefore not BMV land. There is no Grade 1 land, around 30.8 hectares (approximately 4%) of Grade 2 land, and approximately 209.3 hectares (around 29%) of Subgrade 3a land. The distribution of ALC grades is shown in **ES Volume 2, Figure 17-2: Agricultural Land Classification Mapping [APP-172]**.

Reference	Theme	Comments/Issues Raised	Applicant's Response
		locations for solar generation, including rooftops, commercial estates and previously developed land, the use of extensive areas of productive farmland in this location requires a more robust justification than has been provided.	The Applicant has had regard to agricultural land quality in the design and site selection process and has sought, where practicable, to locate infrastructure on lower quality land. The Scheme will result in a temporary but long-term and reversible loss of agricultural land for the operational life of the Scheme. As set out in **ES Volume 1, Chapter 17, Section 17.10 [APP-069]**, this gives rise to a temporary, long-term moderate adverse effect on agricultural land overall, and a temporary, long-term major/moderate adverse effect on BMV land, both of which are assessed as significant. These effects are fully reported in the ES and are a matter for the Secretary of State to weigh in the planning balance against the need for the Scheme and its wider benefits. There are no significant permanent effects on agricultural land, as all land will be returned to its original use and condition as far as practicable following decommissioning. The Applicant notes that the approach to assessing the quality of the agricultural land is under discussion with Natural England and is set out in the relevant Statement of Common Ground to be submitted at Deadline 1. Measures to avoid and minimise effects on soils and agricultural land are embedded within the Scheme design and secured through Schedule 2, Requirement 17 of the **Draft DCO [APP-016]** which includes the preparation and implementation of a Soil Resources Management Plan (SRMP) in accordance with the **Outline SRMP [APP-280].** The SRMP will control soil handling, storage and reinstatement during construction, operation and decommissioning, and a requirement to prepare and implement a Decommissioning Strategy in accordance with the **Outline Decommissioning Strategy [APP-**

Reference	Theme	Comments/Issues Raised	Applicant's Response
			279], which is secured by Schedule 2, Requirement 20 of the **Draft DCO [APP-016]**. The **Outline Landscape and Ecological Management Plan [APP-283]** details how grassland and other habitat will be established beneath and between the solar panels. The detailed LEMP will be secured through Schedule 2, Requirement 7 of the **Draft DCO [APP-016]**. Through the establishment and maintenance of long-term grassland beneath and between the solar arrays, soil health, quality and structure are anticipated to improve over the lifetime of the Scheme, resulting in a temporary, moderate beneficial effect on soil resources at decommissioning, which is assessed as significant (**ES Volume 1, Chapter 17, Sections 17.10 and 17.12 [APP-069]**). In relation to suggestions that brownfield land or alternative locations should be used, including rooftop, these matters are addressed in **ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP-056] and in the Statement of Need [APP-266]**. The Applicant has considered alternatives, including previously developed land and other forms of solar deployment, as part of the site selection and design evolution process. As shown in Table 2-2 of **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]**, the Applicant has considered previously developed land / brownfield land over 1 hectare within the area of search, based on the brownfield land registers of the relevant Local Planning Authorities, and concluded that none of the sites are large enough to provide a viable land parcel of at least 40 ha and sites were not considered to be available as they have planning permission for residential development and/or are allocated for residential/mixed use development.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			With regard to siting the Scheme alongside existing infrastructure corridors such as motorways, major roads and railways, **ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP-056]** and the accompanying **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]** set out the alternatives considered by the Applicant. The assessment did not identify any unconstrained, suitable and available land that could utilise existing infrastructure corridors. As set out in, **ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP-056],** discussions were had with Wiltshire Council regarding routeing the Cable Route Corridor to follow the A350, but this was discounted due to concerns of potential disruptions to road traffic associated with installation of the cable immediately adjacent to the A350. National policy and government guidance, as set out in the **Statement of Need [APP-266]**, recognise that while rooftop and smaller-scale solar installations are an important part of the energy mix, they cannot alone meet the scale of capacity required to achieve clean power and net zero objectives. Large-scale ground-mounted solar therefore remains necessary in addition to, not instead of, rooftop solar. The Applicant does not consider that food security will be compromised by the Scheme (or solar energy more widely). The latest figures to September 2024 indicate that solar occupied around 21,200 ha of agricultural land in the UK. In 2025, 545,000 ha of arable land in England were left uncropped (source: Department for Environment, Food & Rural Affairs, Agricultural land use in England at 1 June 2025). It should also be noted that food security is not identified as an issue within the

Reference	Theme	Comments/Issues Raised	Applicant's Response
			suite of Energy National Policy Statements or the National Planning Policy Framework (NPPF). Further, the Government's UK Solar Roadmap (2025) states that solar development is not considered to compromise food security, but that the climate and nature crisis poses the greatest long-term risk to food security- a risk which the Scheme directly helps to address by providing a secure, low-carbon source of electricity. As set out in Section 2 of the **Outline Decommissioning Strategy [APP-279],** post-decommissioning of the Scheme, the landowners would choose how the land is to be used and managed. The landowner may return all of the land to arable use, although it is likely that established habitats such as hedgerows and woodland would be retained given their potential benefits to agricultural land and the wider farming estate.
JG-005	Transport and Access	Construction Traffic and Rural Roads The local highway network consists primarily of narrow rural lanes serving small villages and individual dwellings. Extended construction traffic associated with the development would: - Exacerbate existing road damage - Raise highway safety concerns - Cause sustained disruption to local residents These impacts have not been adequately addressed.	The potential effects of construction traffic on the local highway network are assessed in **ES Volume 1, Chapter 13: Transport and Access [APP-065]**, which considers construction vehicle movements, traffic volumes, road safety and effects on road users. This included the capacity of local roads and infrastructure to accommodate construction vehicles with consideration of construction traffic volumes, vehicle types, route suitability, and network performance. The assessment concludes that the level of construction traffic associated with the Scheme is unlikely to materially affect road safety on links within the Study Area, and no significant adverse effects on accident risk are anticipated. The assessment additionally concludes that with appropriate mitigation such as the CTMP in place, there would be no significant adverse impacts on the local highway network during

Reference	Theme	Comments/Issues Raised	Applicant's Response
			the construction, operation and maintenance, and decommissioning phases of the Scheme. The assessment presented in Annex H of **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]** demonstrates adequate carriageway width or frequency of passing place opportunity to pass at least an HGV and a light vehicle as requested in comments provided by Wiltshire Council in its response (August 2025) to the Transport Assessment Scoping Note and confirmed in Paragraph 4 of 'Appendix A - Highways and Transport Document Review - Detailed Comments'. This confirms that no passing bay or widening improvements are needed to accommodate these movements on the construction route outside of the Order Limits. The distances between passing points outside of the Order Limits are all within 150 m with forward visibility extending to the next passing point and beyond. This is within the generally accepted distance of 200 metres. As set out in the **Outline Construction Traffic Management Plan (Outline CTMP) [APP-287]**, a booking system will be set up to manage arrivals and departures to the Order Limits. This will be implemented in coordination with banksmen, which will be able to hold back any cross-over, should there be any delays on the roads. This will prevent HGVs generated by the Scheme passing each other in opposite directions on the local roads forming part of the construction routes and will be confirmed as part of the final CTMP. Regarding routes through the Hulavington area , excessive widening of existing rural routes to allow two HGVs to pass would be over engineering, because of the following reasons: • temporary nature of the construction period;

Reference	Theme	Comments/Issues Raised	Applicant's Response
			• trip generation of 76 HGVs on the route to Lime Down D is an estimate of the deliveries on a peak day, so does not represent a daily average; • trip generation of 76 HGVs on the route to Lime Down D is based on the worst-case assumptions, including but not limited to, all phases and Solar PV Sites being constructed simultaneously and a 50% uplift; • average number of HGV construction movements along the route to Lime Down D is only 50 per day/7 per hour/one every 8 minutes (less than the journey time along the route); - assuming a realistic construction programme, the average number of HGV construction movements along the route to Lime Down D is only 32 per day/5 per hour/one every 13 minutes (less than the journey time along the route); • delivery times during the construction phase are limited to those times set out in the **Outline CTMP [APP-287]**. There will be no HGV construction trips outside of these hours; • there would be a much greater impact on hedgerow, trees and character; and • low level of existing HGVs on the route to Lime Down D (average number of existing HGV movements is only 46 per day, with some of these movements occurring outside of proposed construction hours set out in the **Outline CTMP [APP-287]**) Regarding routes through the Foss Way area, excessive widening of existing rural routes to allow two HGVs to pass would be over engineering, because of the following reasons: • temporary nature of the construction period;

Reference	Theme	Comments/Issues Raised	Applicant's Response
			• trip generation of 16 HGVs on the route to Lime Down A is an estimate of the deliveries on a peak day, so does not represent a daily average; • trip generation of 16 HGVs on the route to Lime Down A is based on the worst-case assumptions, including but not limited to, all phases and Solar PV Sites being constructed simultaneously and a 50% uplift; • average number of HGV movements along the route to Lime Down A is only 10 per day/less than 2 per hour/one every 42 minutes (less than the journey time along the route), with the construction phase for Lime Down Site A only lasting 9 months • delivery times during the construction phase are limited to those times set out in the **Outline CTMP [APP-287]**. There will be no HGV trips outside of these hours; • impact on hedgerow, trees and character; and • low level of existing HGVs on the route to Lime Down A (average number of existing HGV movements is only 40 per day, with some of these movements occurring outside of proposed construction hours set out in the **Outline CTMP [APP-287]**) Regarding routes through the Alderton area, excessive widening of existing rural routes to allow two HGVs to pass would be over engineering, because of the following reasons: • temporary nature of the construction period; • trip generation of 50 HGVs on the route to Lime Down A-C is an estimate of the deliveries on a peak day, so does not represent a daily average; • trip generation of 50 HGVs on the route to Lime Down A-C is based on the worst-case assumptions, including but not limited to, all phases and Solar PV Sites being constructed simultaneously and a 50% uplift;

Reference	Theme	Comments/Issues Raised	Applicant's Response
			• average number of HGV construction movements along the Route to Lime Down A-C route is only 32 per day/7 per hour/one every 8 minutes (less than the journey time along the route); • assuming a realistic construction programme, the average number of HGV construction movements along the route to Lime Down A-C is only 17 per day/less than 3 per hour/one every 25 minutes (less than the journey time along the route) • delivery times during the construction phase are limited to those times set out in the **oCTMP [APP-287]**. There will be no HGV trips outside of these hours; • impact on hedgerow, trees and character; and • low level of existing HGVs on the route to Lime Down A-C (average number of existing HGV movements is only 20 per day, with some of these movements occurring outside of proposed construction hours set out in the **oCTMP [APP-287]** Further detail of trip generation has also been added to **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]** which will be submitted at Deadline 1 of Examination. To provide further comfort, additional information has been added to **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]** which will be submitted at Deadline 1 of Examination. This demonstrates that there is adequate carriageway width and/or passing place opportunity for two HGVs.
JG-006	Landscape and Visual	Conclusion Taken together, the impacts on residential amenity, landscape character, historic environment, ecology, agricultural land and rural infrastructure outweigh the benefits of the proposal in this location.	The Applicant notes this comment and has responded to the impacts in detail above.

Reference	Theme	Comments/Issues Raised	Applicant's Response
		For these reasons, I request that development consent for the Lime Down Solar Project be refused.	

6.26 Andrew Greenhill

Table 6-26 RR-0252

Reference	Theme	Comments/Issues Raised	Applicant's Response
AG-001	Socio-Economics, Tourism and Recreation	I object to the proposed Lime Down development for a number of important reasons I am a tenant farmer in (Redacted), of which appoximately 85 acres of the land I rent is included in the proposed scheme. For the viability of my mixed farm these fields are crucial. They are the best agricultural fields(Grade 2) in the village and provide both cereals for animal feed and straw for winter bedding. Much of the local land available is only suitable for grazing so to take away great arable land makes any cattle enterprise less viable with the need to buy in straw etc from further afield. It is short sighted to limit a farm or village's ability to be self sufficient. Beware in a wet winter these fields in Rodbourne (sand over clay) can become very unstable and unworkable for long periods.	The assessment of effects on agricultural land and farming operations, including temporary land take associated with the cable route, is provided in **ES Volume 1, Chapter 17: Soils and Agriculture [APP-069]**, with detailed construction methodology set out in **ES Volume 3, Appendix 3 2: Cable Route Construction Method Statement [APP-183]**. The cable trench required for installation of underground cables would have a maximum anticipated working width of approximately 7 metres. This equates to a temporary disturbance of approximately 0.07 hectares per hectare of land crossed. Disturbance associated with cable installation would be short term and localised, and following reinstatement, agricultural operations within the affected fields would be able to recommence. Accordingly, land take associated with cable installation would not permanently remove the affected land from agricultural use, and the extent and duration of disturbance have been assessed as limited. The **Outline Soil Resources Management Plan (SRMP) [APP-280]** sets out suitable handling windows for soils and details field tests to be undertaken to ensure soils are not worked when they are too wet.
AG-002	Landscape and Visual Ecology and Biodiversity	Creeping industrialisation of the countryside. Major roads such as the M4 and A429 and railways are part of the landscape in the Lime down project but it is so important to keep the countryside spaces intact between these major transport routes. This is just as important for the wildlife as it is for the residents quality of life.	An assessment of landscape and visual effects are presented in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**. The Landscape and Visual Impact Assessment (LVIA) assesses effects on identified landscape and visual receptors, including residential properties, users of public rights of way and roads, and identifies where significant effects may occur.

Reference	Theme	Comments/Issues Raised	Applicant's Response
		Wildlife. Farmers have engaged in many schemes in recent years to improve biodiversity and help wildlife. The addition of fenced in solar panels to the landscape is not going to help the wildlife in any way. Normal animal routes across the landscape will be compromised.	The **LVIA [APP-060]** found no significant long term visual effects to residential properties as a consequence of the Scheme. The visual effects of the Scheme are summarised in **ES Volume 3, Appendix 8-3-3 [APP-192]**. Temporary Major/Moderate and Moderate Adverse effects on visual receptors have been recorded across the Scheme during construction and at Year 1. However, for the majority of these receptors, the effects reduce to non –significant levels as a result of the embedded mitigation measures which are set out in Section 8.9 of **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]** and include landscape buffers, retention of existing hedgerows and woodland, and new planting to provide screening and integration over time. The assessment also identifies that there would be some long-term significant effects on the visual amenity of users of some localised footpaths, as a result of the Scheme. This predominantly relates to locations where footpaths diagonally cross fields and mitigation planting would be inappropriate to landscape character and the legacy landscape. Those receptors which would experience Significant Long Term Visual Effects are listed in Table 8-30 of the **LVIA [APP-060].** The scale of development within the Order Limits has been significantly reduced from the layout assessed in the Preliminary Environmental Information Report (PEIR) through an iterative design process undertaken in response to consultation and in accordance with the mitigation hierarchy to avoid, reduce and mitigate adverse effects. As part of this design evolution, panels along the edge of the Cotswolds

Reference	Theme	Comments/Issues Raised	Applicant's Response
			National Landscape and along the Fosse Way have been removed. Mitigation measures to address landscape and visual effects are set out in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**, **Figure 3-4-1 to 3-4-5.2 Landscape and Ecology Mitigation Plan [APP-084]** and secured within the **Outline Landscape and Ecological Mitigation Plan (OLEMP) [APP-283]** and the **Outline Ecological Protection and Mitigation Strategy (OEPMS) [APP-284]**. These documents include proposals for new and enhanced planting, retention of existing hedgerows and woodland, and landscape integration measures to reduce visual effects over time. In addition, the Scheme design incorporates minimum offsets from existing landscape features, including residential properties, ancient woodland, woodland, hedgerows, public rights of way and watercourses, to further limit visual impacts. Although these measures reduce the effects of the Scheme on nearly all receptors, as noted above there are 10 receptors which would experience Significant Visual Effects for the duration of the Scheme as set out Table 8-30 of the **LVIA [APP-060]**. Mitigation measures to address landscape and visual effects are set out in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**, **Figure 3-4-1 to 3-4-5.2 Landscape and Ecology Mitigation Plan [APP-084]**. The preparation, approval and implementation of detailed landscape and ecological management plans, substantially in accordance with the **OLEMP [APP-283]** and **OEPMS [APP-284]**, are secured through requirements in Schedule 2 of the

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Draft Development Consent Order [APP-016], ensuring that the identified mitigation measures are delivered and maintained throughout the lifetime of the Scheme. Potential impacts on ecology and biodiversity are fully assessed in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**. This assessment considers baseline ecological conditions and evaluates likely significant effects arising during the construction, operation and decommissioning phases of the Scheme. It identifies avoidance, mitigation and enhancement measures to address potential impacts on habitats and protected and notable species. It also identifies opportunities for ecological enhancement, including the creation and long-term management of habitats, and delivery of biodiversity net gain. The assessment concludes that, with the identified embedded and additional mitigation measures in place, no unacceptable significant adverse effects on ecology and biodiversity are anticipated. The Applicant notes that the approach to the assessment in relation to ecology and biodiversity in general is being discussed with Wiltshire Council and Natural England and is set out in the relevant **Statements of Common Ground** to be submitted at Deadline 1. During construction, specific measures are proposed to avoid disturbance and displacement of wildlife. These include protective buffers around sensitive habitats and features, timing restrictions on vegetation clearance, pre-construction ecological surveys, species-specific mitigation, and pollution prevention controls which are set out in the **OEPMS [APP-284]**. Measures to protect trees and hedgerows are also set out in **ES Volume 1, Chapter 10 Arboriculture [APP-062]**. The Scheme will also result in the cessation of intensive arable

Reference	Theme	Comments/Issues Raised	Applicant's Response
			farming within the Solar PV Sites. As identified in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**, this is expected to reduce the ongoing application of herbicides and pesticides, supporting improvements in habitat quality over the operational lifetime of the Scheme. The reversion of existing arable land within the Solar PV Sites to predominantly grassland habitats can be expected to benefit a wide range protected and notable species, as identified in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**. Mitigation and enhancement measures are detailed in the **OLEMP [APP-283]** and the **OEPMS [APP-284]**, which set out habitat creation, species protection measures, buffer zones and long-term ecological management. The preparation, approval and implementation of the detailed Landscape and Ecological Management Plan, substantially in accordance with the **OLEMP [APP-283]**, are secured through Requirement 7 in Schedule 2 of the **Draft Development Consent Order [APP-016]**. The preparation, approval and implementation of the detailed Ecological Protection and Mitigation Strategy, substantially in accordance with the **OEPMS [APP-284]**, are secured through Requirement 8 in Schedule 2 of the **Draft Development Consent Order [APP-016]**. These requirements ensure that ecological protection and enhancement measures are delivered and maintained throughout construction and operation of the Scheme. Impacts on physical health and wellbeing are assessed in **ES Volume 1, Chapter 18: Human Health [APP-070].** This chapter provides a comprehensive assessment of the Scheme's potential effects on human health, including physical health and wellbeing, through consideration of a broad range of health determinants with physical health pathways. These include access to housing, access to open space and recreation,

Reference	Theme	Comments/Issues Raised	Applicant's Response
			transport and connectivity, climate change, air quality, water quality, land quality, noise and vibration, and access to health and social care services. The assessment in **ES Volume 1, Chapter 18: Human Health [APP-070]** applies a health-based review of relevant technical chapters to identify potential pathways by which the Scheme could affect physical health. It concludes that, with the embedded mitigation and additional measures secured through the relevant management plans **[APP-277** to **APP-287]** secured by their respective requirements in Schedule 2 to the **Draft DCO [APP-016]**, the Scheme would not give rise to significant adverse effects on population physical health at any phase of the Scheme. Mitigation measures include (but are not limited to) ensuring PROWs remain open as much as is practicable, inbound workers are accommodated in the most suitable locations for housing and health service access, community liaison and engagement is maintained, and construction impacts on waterways, soils, noise and air quality are regulated. Priority has been given in the assessment to communities most likely to experience potential health-related effects, within the 2 km Study Area surrounding the Scheme. The Applicant notes that the assessment methodology for health and wellbeing has been agreed with Wiltshire Council's Public Health team and is set out in the relevant Statement of Common Ground to be submitted at Deadline 1**.**
AG-003	Ecology and Biodiversity	Hares thrive in the big open fields and skylarks nest in cereal crops,	Potential impacts of the Scheme on brown hares are assessed in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-**

Reference	Theme	Comments/Issues Raised	Applicant's Response
		providing them with cover protection from predators.	**061]**, which considers baseline conditions and evaluates likely effects on mammals during construction, operation and decommissioning. The assessment concludes that, with embedded mitigation in place, no significant adverse effects on brown hares are anticipated. The Scheme design retains extensive areas of grassland and field margin habitats, which provide suitable foraging and shelter opportunities for hares. The Applicant notes that the approach to the assessment in relation to brown hares has been agreed with Wiltshire Council and is set out in the relevant **Statement of Common Ground** to be submitted at Deadline 1. The assessment also notes that brown hares are known to take shelter beneath solar panels on operational solar sites, where the retention of grassland beneath and between arrays can provide suitable habitat conditions. The preparation, approval and implementation of the detailed Landscape and Ecological Management Plan, substantially in accordance with the **OLEMP [APP-283]**, are secured through Requirement 7 in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring habitat management measures benefiting hares are delivered and maintained throughout the lifetime of the Scheme. Potential impacts of the Scheme on skylarks are assessed in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**, which considers baseline bird assemblages and evaluates likely effects on breeding farmland bird species during construction, operation and decommissioning. The assessment identifies skylarks as a key species of

Reference	Theme	Comments/Issues Raised	Applicant's Response
			conservation interest within the Scheme area. It concludes that a proportion of the current skylark population will be displaced from the Solar PV Sites, which will give rise to an adverse residual effect at a Local level. The Applicant notes that the approach to the assessment with relation to skylark is being discussed with Wiltshire Council and is set out in the relevant **Statement of Common Ground** to be submitted at Deadline 1. Skylark-specific mitigation and habitat enhancement measures are incorporated into the Scheme design to reduce effects as far as practicable. These include the provision of suitably large, open set-aside and grassland habitats designed to provide appropriate breeding and foraging conditions. These measures are illustrated in **ES Volume 2, Figure 3-4: Landscape and Ecological Mitigation Plan [APP-084]** and detailed in the **OLEMP [APP-283]**. Measures to safeguard nesting skylarks during construction, including timing restrictions on vegetation clearance and pre-construction ecological checks, are set out in the **Outline Ecological Protection and Mitigation Strategy (OEPMS) [APP-284]**. The preparation, approval and implementation of the detailed Landscape and Ecological Management Plan and Ecological Protection and Mitigation Strategy, substantially in accordance with the **OLEMP [APP-283]** and **OEPMS [APP-284]**, are secured through Requirements 7 and 8 in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring skylark mitigation and long-term habitat management measures are delivered and maintained throughout the lifetime of the Scheme.

Reference	Theme	Comments/Issues Raised	Applicant's Response
AG-004	Landscape and Visual	4.Visual impact. It,s hard to accept that 2000 acres of beautiful countryside is going to be covered in huge solar panels and battery storage facilities. It is a special and historic landscape to the people that live nearby, and for that to be compromised by this development would be tragic.	An assessment of landscape and visual effects are presented in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**. The Landscape and Visual Impact Assessment (LVIA) assesses effects on identified landscape and visual receptors, including residential properties, users of public rights of way and roads, and identifies where significant effects may occur. The **LVIA [APP-060]** found no significant long term visual effects to residential properties as a consequence of the Scheme. The visual effects of the Scheme are summarised in **ES Volume 3, Appendix 8-3-3 [APP-192]**. Temporary Major/Moderate and Moderate Adverse effects on visual receptors have been recorded across the Scheme during construction and at Year 1. However, for the majority of these receptors, the effects reduce to non –significant levels as a result of the embedded mitigation measures which are set out in Section 8.9 of **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]** and include landscape buffers, retention of existing hedgerows and woodland, and new planting to provide screening and integration over time. The assessment also identifies that there would be some long-term significant effects on the visual amenity of users of some localised footpaths, as a result of the Scheme. This predominantly relates to locations where footpaths diagonally cross fields and mitigation planting would be inappropriate to landscape character and the legacy landscape. Those receptors which would experience Significant Long Term Visual Effects are listed in Table 8-30 of the **LVIA [APP-060].** The scale of development within the Order Limits has been significantly reduced from the layout assessed in the

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Preliminary Environmental Information Report (PEIR) through an iterative design process undertaken in response to consultation and in accordance with the mitigation hierarchy to avoid, reduce and mitigate adverse effects. As part of this design evolution, panels along the edge of the Cotswolds National Landscape and along the Fosse Way have been removed. Mitigation measures to address landscape and visual effects are set out in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**, **Figure 3-4-1 to 3-4-5.2 Landscape and Ecology Mitigation Plan [APP-084]** and secured within the **Outline Landscape and Ecological Mitigation Plan (LEMP) [APP-283]** and the **Outline Ecological Protection and Mitigation Strategy (OEPMS) [APP-284]**. These documents include proposals for new and enhanced planting, retention of existing hedgerows and woodland, and landscape integration measures to reduce visual effects over time. In addition, the Scheme design incorporates minimum offsets from existing landscape features, including residential properties, ancient woodland, woodland, hedgerows, public rights of way and watercourses, to further limit visual impacts. Although these measures reduce the effects of the Scheme on nearly all receptors, as noted above there are 10 receptors which would experience Significant Visual Effects for the duration of the Scheme as set out Table 8-30 of the **LVIA [APP-060]**. Mitigation measures to address landscape and visual effects are set out in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**, **Figure 3-4-1 to 3-4-5.2 Landscape and Ecology Mitigation Plan [APP-084]**.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			The preparation, approval and implementation of detailed landscape and ecological management plans, substantially in accordance with the **OLEMP [APP-283]** and **OEPMS [APP-284]**, are secured through requirements in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that the identified mitigation measures are delivered and maintained throughout the lifetime of the Scheme.
AG-005	Transport and Access	5. Construction traffic. The impact of the construction of the Lime down project is going to have such a dreadful impact on everyone that lives in the area. All the construction lorries and cars overloading our narrow country roads during the installation will severely impact the residents. Many of the country lanes are simply not big enough to deal with the number of lorries proposed.	The capacity of local roads and infrastructure to accommodate construction vehicles is assessed in **ES Volume 1, Chapter 13: Transport and Access [APP-065]**, which considers construction traffic volumes, vehicle types, route suitability and network performance. The assessment concludes that, with appropriate mitigation in place, there would be no significant adverse impacts on the local highway network. Supporting technical information is provided in **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]**, which identifies specific locations where traffic management measures or passing arrangements may be required on narrower sections of construction routes. The assessment presented in Annex H of **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]** demonstrates adequate carriageway width or frequency of passing place opportunity to pass at least an HGV and a light vehicle as requested in comments provided by Wiltshire Council. All construction routes also include passing points to allow two HGVs to pass. Mitigation measures to manage construction traffic are set out in the **Outline Construction Traffic Management Plan (Outline CTMP) [APP-287]**. The CTMP is designed to minimise the effects of construction traffic on local roads and includes measures for vehicle routing, delivery scheduling and liaison

Reference	Theme	Comments/Issues Raised	Applicant's Response
			with the local highway authority. The preparation, approval and implementation of the final CTMP, substantially in accordance with the **Outline CTMP [APP-287]**, are secured through Requirement 15 of Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring construction traffic impacts on local roads and infrastructure are appropriately managed throughout the construction phase of the Scheme.
AG-006	Human Health	Mental health. It's hard to think of anything that has had such a detrimental effect on people's mental health since the Lime down proposal was announced. It has cast a very dark cloud over the community as it is threatening the quality of life of so many people that live and work in this part of the world. If this vandalisation of beautiful countryside is allowed to go ahead it will be a very sad day indeed and one where the joy of living in small village community such as ours will be lost forever.	Impacts on mental health and wellbeing are assessed in **ES Volume 1, Chapter 18: Human Health [APP-070]**. This chapter provides a comprehensive assessment of the Scheme's potential effects on human health, including mental health and wellbeing, through consideration of a broad range of health determinants. These include access to open space and recreation, transport and connectivity, community identity and cohesion, employment and income, noise and vibration, air quality, and access to health and social care services. The assessment applies a health "lens" to the findings of relevant technical chapters and concludes that, with the embedded mitigation and additional measures secured through the relevant management plans **[APP-277** to **APP-287]** secured by their respective requirements in Schedule 2 to the **Draft DCO [APP-016]**, the Scheme would not give rise to significant adverse effects on population health, including mental health and wellbeing. Mitigation measures include (but are not limited to) ensuring PROWs remain open as much as is practicable, HGV movements are set to defined routes and within set hours, community liaison and engagement is maintained, and construction impacts on noise and air quality are regulated. With specific regard to community liaison, this is directly secured through Requirement 4 in Schedule 2 to the **Draft DCO**

Reference	Theme	Comments/Issues Raised	Applicant's Response
			[APP-016] through the provision of a community liaison group. This group will act as an intermediary between the public and the onsite contractors to ensure community concerns and any information they need are communicated and responded to, so as to reduce community anxiety and impacts on mental wellbeing, and to assist in directing the public to mental health support if required. The assessment in **ES Volume 1, Chapter 18: Human Health [APP-070]** focuses on communities within a 2 km Study Area surrounding the Scheme, identified as those most likely to experience potential health-related effects. Baseline analysis demonstrates that rates of poor mental health within the Study Area are generally lower than national averages, and the assessment considers potential pathways by which the Scheme could influence mental wellbeing, including changes to environment, amenity, access and community factors. Residual effects of the Scheme on health following mitigation are assessed as not significant at any phase of the Scheme. Consultation with Wiltshire Council's Public Health Team has informed the approach to mental health considerations, as documented in **ES Volume 3, Appendix 18-1: Human Health Consultation [APP-244].** Through this engagement, the Applicant has committed to signposting locally available mental health and wellbeing resources to members of the public engaging with the Scheme, using information provided by Wiltshire Council's Public Health Team. The Applicant will continue to monitor consultation responses relating to mental health and will provide appropriate signposting to existing local support services where requested. The Applicant notes that the assessment methodology for health and wellbeing has been agreed with Wiltshire Council's Public Health team and is set

Reference	Theme	Comments/Issues Raised	Applicant's Response
			out in the relevant Statement of Common Ground to be submitted at Deadline 1.
AG-007	Construction and Decommissioning	6.Pollution. Noise pollution from the constuction of the development will severely impact the quality of life of those living nearby the site for a long period. Pollution of the land and surrounding waterways is likely to be significant. Pouring so much concrete into agricultural land can never be environmentally sound. One can only imagine the scale of pollution when something goes wrong with one of the battery storage sites.	The noise and vibration impacts arising from construction activities are assessed in Section 14.10 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**, with supporting technical information provided in **ES Volume 3, Appendix 14-4: Noise Modelling [APP-237]**. For the purposes of the assessment, a reasonable worst-case scenario assuming piling activities has been considered. The Applicant notes that the approach to construction noise and vibration has been discussed with Wiltshire Council, as described in Section 14.2 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**. Mitigation measures associated with construction activity are presented in Section 14.9 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]** and are committed to through the **Outline Construction Environmental Management Plan [APP-277]**. A noise monitoring programme agreed with Wiltshire Council will be carried out during construction. The preparation, approval and implementation of the Construction Environmental Management Plan, substantially in accordance with the **Outline CEMP [APP-277]**, are secured through Requirement 13 in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that construction noise and vibration are appropriately controlled throughout the construction phase of the Scheme. With these measures in place, the assessment concludes that no significant effects from construction noise or vibration are expected.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			An assessment of potential contamination risks is provided in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [APP-063]** and **ES Volume 1, Chapter 19: Ground Conditions [APP-071]**, which consider risks to surface water, groundwater and sensitive receptors during construction, operation and decommissioning of the Scheme. These assessments conclude that, with appropriate mitigation and management measures in place, no significant contamination effects are anticipated. The Applicant notes that the approach to risk of contamination of groundwater and surface water has been agreed with Wiltshire Council and is being discussed with the Environment Agency. This approach is set out in the relevant Statement of Common Ground with Wiltshire to be submitted at Deadline 1 and will be included in a future Statement of Common Ground with the Environment Agency. Mitigation and management measures to protect water and ground conditions are set out in the **Outline Construction Environmental Management Plan (Outline CEMP) [APP-277]** and supporting management plans. These include pollution prevention controls, containment measures, emergency response procedures, and site-specific drainage design. In particular, drainage within substation and Battery Energy Storage System (BESS) areas will incorporate lined drainage and automatically actuating shut-off valves to contain any accidental spills or firewater, preventing release to surrounding land or watercourses. Routine maintenance and panel cleaning will use minimal water and will not require detergents or chemical cleaning products, in line with standard industry practice, meaning there is no expected risk of chemical runoff from panel washing. In addition, the cessation of agricultural activity within the Solar PV

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Sites will remove routine inputs of fertilisers, pesticides and herbicides, thereby reducing existing sources of diffuse contamination. The preparation, approval and implementation of the detailed CEMP, substantially in accordance with the **Outline CEMP [APP-277]**, is secured through Requirement 13 in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that contamination risks are appropriately managed throughout construction and operation of the Scheme. An assessment of the effects of the Scheme on air quality is provided in **ES Volume 1, Chapter 15: Air Quality [APP-067]**, which considers potential air quality impacts during construction, operation and decommissioning. The assessment examines dust emissions, vehicle emissions, non-road mobile machinery emissions, back-up generator emissions and emissions associated with a potential BESS fire. Supporting technical assessments are provided in **ES Volume 3, Appendix 15-1: Construction Dust Methodology and Assessment [APP-238]** and **ES Volume 3, Appendix 15-2: BESS Fire Emissions Modelling [APP-239]**. The assessment concludes that, with embedded mitigation measures in place, the Scheme would not give rise to significant adverse air quality effects at human or ecological receptors. Measures to control operational emissions, including maintenance activities and back-up generator testing, are set out in the **Outline Operational Environmental Management Plan [APP-278]**. Measures to control BESS fire emissions are outlined in the **Outline Battery Safety Management Plan [APP-286]**. This includes measures to limit human exposure to air pollution in the event of a fire.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			The preparation, approval and implementation of the detailed Construction Environmental Management Plan, Construction Traffic Management Plan, Operational Environmental Management Plan and Battery Safety Management Plan, substantially in accordance with the outline plans, are secured through requirements in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that air quality impacts are appropriately controlled throughout the construction and operation of the Scheme.

6.27 Kenneth T Blackmore

Table 6-27 RR-2674

Reference	Theme	Comments/Issues Raised	Applicant's Response
KTB-001	Landscape and Visual Human Health	I object to the proposed plans for the Lime Down Solar Park on the following grounds;- 1/ The industrialisation on such a large scale in an area of Outstanding Natural Beauty will directly affect at least 20 villages and their surroundings causing lasting distress and upheaval to scores of people who settled here and have lived here for many years in peace and quiet. Those who own property will see values deteriorate rapidly and our way of life changed forever.	The Cotswolds National Landscape (CNL) is fully assessed as a standalone receptor within **ES Volume 3, Appendix 8.6: Assessment of Effects on the Special Qualities of the Cotswolds National Landscape [APP-197]**. This assessment considers the effects of the Scheme on landscape character, visual amenity and the special qualities of the CNL, including tranquillity. The assessment found that there would be some short term impact to landscape character within the setting of the CNL but due to the avoidance measures embedded within the Scheme, harm to the CNL itself would be minimal with beneficial effects in the long term which would further the purposes of the designation. In respect of visual amenity, some short-term adverse effects would be experienced by a small number of visual receptors with views to and from the CNL. However, these would reduce over time as a result of the proposed mitigation. The assessment of effects on the special qualities of the CNL scoped out 3 SQs as there is no association with the Site. The assessment found that there are no direct effects on the remaining SQs. There are some Minor/ Negligible short-term effects on a small number of visual receptors within the setting of the CNL which effect SQ7 -Tranquillity and SQ13 Archaeology and historic associations. However, these effects are mitigated by Year 15 when proposed vegetation has matured. The assessment also found that there would be beneficial effects on SQ 6 – Biodiversity and nature recovery as a result of the delivery of approximately 119.7 hectares of flower-rich neutral grassland (as defined in the BNG assessment) and SQ 12 - An accessible landscape as a result of the delivery of approximately 12.8km of new permissive paths within the setting of the CNL. The remaining SQs would remain entirely intact. The Scheme was refined through an iterative design process to avoid and reduce effects on the CNL and its setting. Panels along

Reference	Theme	Comments/Issues Raised	Applicant's Response
			the edge of the CNL were removed from the Order Limits in fields C2, C3 and C4 where significant visual effects on receptors within the CNL were identified. Panels were also removed from fields C1, C6, C8, the western section of C9 and the majority of C10, with this land now proposed for ecological mitigation to protect the setting of the CNL. In addition, panels within fields A11 and A12 were removed and the land repurposed for ecological mitigation to protect the setting of the CNL towards Sherston. All land parcels adjacent to the CNL are proposed to deliver habitat enhancement, informed by the CNL Management Plan and the Cotswolds National Landscape Strategy and Guidelines, to further the purposes of the designation. Details of the proposed landscape and ecological mitigation and enhancement measures such as the avoidance measures to remove panels from the boundary of CNL are provided in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060], Figure 3-4-1 to 3-4-5.2 Landscape and Ecology Mitigation Plan [APP-084]** and secured within the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283],** and the **Outline Ecological Protection and Mitigation Strategy (PEPMS) [APP-284]**. The preparation, approval and implementation of the detailed Landscape and Ecological Management Plan, substantially in accordance with the **OLEMP [APP-283]**, are secured through Requirement 7 in Schedule 2 of the Draft Development Consent Order [APP-016]. The preparation, approval and implementation of the detailed Ecological Protection and Mitigation Strategy, substantially in accordance with the **OEPMS [APP-284]**, are secured through Requirement 8 in Schedule 2 of the **Draft Development Consent Order [APP-016]**. These requirements ensure that the identified mitigation and enhancement measures

Reference	Theme	Comments/Issues Raised	Applicant's Response
			are delivered and maintained throughout the lifetime of the Scheme. Impacts on mental health and wellbeing are assessed in **ES Volume 1, Chapter 18: Human Health [APP-070]**. This chapter provides a comprehensive assessment of the Scheme's potential effects on human health, including mental health and wellbeing, through consideration of a broad range of health determinants. These include access to open space and recreation, transport and connectivity, community identity and cohesion, employment and income, noise and vibration, air quality, and access to health and social care services. The assessment applies a health "lens" to the findings of relevant technical chapters and concludes that, with the embedded mitigation and additional measures secured through the relevant management plans **[APP-277** to **APP-287]** secured by their respective requirements in Schedule 2 to the **Draft DCO [APP-016]**, the Scheme would not give rise to significant adverse effects on population health, including mental health and wellbeing. Mitigation measures include (but are not limited to) ensuring PROWs remain open as much as is practicable, HGV movements are set to defined routes and within set hours, community liaison and engagement is maintained, and construction impacts on noise and air quality are regulated. With specific regard to community liaison, this is directly secured through Requirement 4 in Schedule 2 to the **Draft DCO [APP-016]** through the provision of a community liaison group. This group will act as an intermediary between the public and the onsite contractors to ensure community concerns and any information they need are communicated and responded to, so as to reduce community anxiety and impacts on mental wellbeing, and to assist in directing the public to mental health support if required.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			The assessment in **ES Volume 1, Chapter 18: Human Health [APP-070]** focuses on communities within a 2 km Study Area surrounding the Scheme, identified as those most likely to experience potential health-related effects. Baseline analysis demonstrates that rates of poor mental health within the Study Area are generally lower than national averages, and the assessment considers potential pathways by which the Scheme could influence mental wellbeing, including changes to environment, amenity, access and community factors. Residual effects of the Scheme on health following mitigation are assessed as not significant at any phase of the Scheme. Consultation with Wiltshire Council's Public Health Team has informed the approach to mental health considerations, as documented in **ES Volume 3, Appendix 18-1: Human Health Consultation [APP-244].** Through this engagement, the Applicant has committed to signposting locally available mental health and wellbeing resources to members of the public engaging with the Scheme, using information provided by Wiltshire Council's Public Health Team. The Applicant will continue to monitor consultation responses relating to mental health and will provide appropriate signposting to existing local support services where requested. The Applicant notes that the assessment methodology for health and wellbeing has been agreed with Wiltshire Council's Public Health team and is set out in the relevant Statement of Common Ground to be submitted at Deadline 1.
KTB-002	Transport and Access	2/ Irreparable damage will be caused to the roads and lanes that were not designed or constructed for the volume and weight of the forecast HGV traffic. 3/ Changes to various junctions including the crossroads at Grittleton to allow heavy traffic to manoeuvre will totally ruin the approach to the village	The effects of construction traffic on the local highway network are assessed in **ES Volume 1, Chapter 13: Transport and Access [APP-065]**, which considers construction vehicle routing, traffic volumes and potential impacts on highway safety and road condition. The assessment includes links in the Grittleton area and at the crossroads with Alderton Road. Any carriageway widening will be limited and minor in nature and will not include hedgerow, minor widening will benefit existing road users. The assessment concludes that, with appropriate management

Reference	Theme	Comments/Issues Raised	Applicant's Response
		and other areas, and will probably never be reinstated.	measures in place, construction traffic effects can be appropriately controlled and through road condition surveys pre and post construction, any damage caused to the highway by the construction vehicles will be rectified as set out in Section 6.12 of the **Outline Construction Traffic Management Plan (CTMP) [APP-287]**. Mitigation measures to manage construction traffic and protect local roads are set out in the **Outline Construction Traffic Management Plan (CTMP) [APP-287]**. The CTMP has been developed to minimise impacts on the local highway network and includes measures for routing, scheduling of deliveries and liaison with the local highway authority. A road condition and dilapidation survey of minor roads not typically used by HGV traffic pre and post construction is committed to within the CTMP. The CTMP will also secure, as set out in the outline CTMP, that any damage to verges or carriageway surfaces caused by construction vehicles will be rectified to the satisfaction of the local highway authority. The preparation, approval and implementation of the final CTMP, substantially in accordance with the outline CTMP, are secured through Requirement 15 of Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring construction traffic impacts, including potential damage to local roads, are appropriately managed throughout the construction phase of the Scheme.

6.28 Susan Russell

Table 6-28 RR-4575

Reference	Theme	Comments/Issues Raised	Applicant's Response
SR-001	Transport and Access Landscape and Visual	I am totally against this project, I am lucky to live in a beautiful village surrounded by beautiful countryside this is farming land surrounded by minor roads. Not only would this be an horrendous eye sore on our beautiful countryside I am extremely concerned about the heavy traffic on these country roads, especially as...	An assessment of landscape and visual effects is provided in the Landscape and Visual Impact Assessment (LVIA) presented in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**. The LVIA assesses effects on identified landscape and visual receptors, including residential properties and users of public rights of way, and identifies where significant effects may occur. The LVIA found no significant long term visual effects to residential properties as a consequence of the Scheme. The scale of development within the Order Limits has been significantly reduced from the layout assessed in the Preliminary Environmental Information Report (PEIR) through an iterative design process undertaken in response to consultation and in accordance with the mitigation hierarchy to avoid, reduce and mitigate adverse effects. As part of this design evolution, panels along the edge of the Cotswolds National Landscape and along the Fosse Way have been removed. Mitigation measures to address landscape and visual effects are set out in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**, Figure 3-4-1 to 3-4-5.2 **Landscape and Ecology Mitigation Plan [APP-084]** and detailed within the **Outline Landscape and Ecological Mitigation Plan (LEMP) [APP-283]** and the **Outline Ecological Protection and Mitigation Strategy (EPMS) [APP-284]**. These documents include proposals for new and enhanced planting, retention of existing hedgerows and woodland, and landscape integration measures to reduce visual effects over time. In addition, the Scheme design incorporates minimum offsets from existing landscape features, including residential properties, ancient woodland, woodland, hedgerows, public rights of way and watercourses, to further limit visual impacts.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			The preparation, approval and implementation of detailed landscape and ecological management plans, substantially in accordance with the **OLEMP [APP-283]** and **EPMS [APP-284]**, are secured through requirements in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that the identified mitigation measures are delivered and maintained throughout the lifetime of the Scheme. The potential effects of construction traffic on the local highway network are assessed in **ES Volume 1, Chapter 13: Transport and Access [APP-065]**, which considers construction vehicle movements, traffic volumes, road safety and effects on road users. This included the capacity of local roads and infrastructure to accommodate construction vehicles with consideration of construction traffic volumes, vehicle types, route suitability, and network performance. The assessment concludes that the level of construction traffic associated with the Scheme is unlikely to materially affect road safety on links within the Study Area, and no significant adverse effects on accident risk are anticipated. The assessment additionally concludes that with appropriate mitigation such as the Construction Traffic Management Plan in place to manage construction vehicle movements, there would be no significant adverse impacts on the local highway network during the construction, operation maintenance, and decommissioning phases of the Scheme. An Outline Construction Traffic Management Plan (CTMP) [APP-287] has been prepared and submitted with the DCO application. The aim of the CTMP is to ensure that the effect of the construction phase on the local highway network is minimised.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			The **Outline CTMP [APP-287]** sets out measures to coordinate construction deliveries by HGVs to arrive and depart between 09:30 and 16:30 where possible, to avoid peak network hours of 08:00–09:00 and 17:00–18:00. It also includes a community liaison element to keep local communities informed about the construction process and to provide a contact for feedback should any issues arise. Compliance with the CTMP will be monitored by the Developer, Contractor and Wiltshire Council as local highway authority. The preparation, approval and implementation of the final CTMP, substantially in accordance with the outline CTMP, are secured through Requirement 15 of Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring construction traffic impacts are appropriately managed throughout the construction phase of the Scheme.
SR-002	Transport and Access	... I live on Alderton Road where hundreds of Lorry's will be using this road.	The assessment presented in Annex H of **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]** demonstrates adequate carriageway width or frequency of passing place opportunity to pass at least an HGV and a light vehicle as requested in comments provided by Wiltshire Council in its response (August 2025) to the Transport Assessment Scoping Note and confirmed in Paragraph 4 of 'Appendix A - Highways and Transport Document Review - Detailed Comments'. This confirms that no passing bay or widening improvements are needed to accommodate these movements on the construction route outside of the Order Limits. The distances between passing points outside of the Order Limits are all within 150 m with forward visibility extending to the next passing point and beyond. This is within the generally accepted distance of 200 metres. As set out in the **OCTMP [APP-287]**, a booking system will be

Reference	Theme	Comments/Issues Raised	Applicant's Response
			set up to manage arrivals and departures to the Order Limits. This will be implemented in coordination with banksmen, which will be able to hold back any cross-over, should there be any delays on the roads. This will prevent HGVs generated by the Scheme passing each other in opposite directions on the local roads forming part of the construction routes and will be confirmed as part of the final CTMP. Regarding routes through the Alderton area, excessive widening of existing rural routes to allow two HGVs to pass would be over engineering, because of the following reasons: • temporary nature of the construction period; • trip generation of 50 HGVs on the route to Lime Down A-C is an estimate of the deliveries on a peak day, so does not represent a daily average; • trip generation of 50 HGVs on the route to Lime Down A-C is based on the worst-case assumptions, including but not limited to, all phases and Solar PV Sites being constructed simultaneously and a 50% uplift; • average number of HGV construction movements along the Route to Lime Down A-C route is only 32 per day/7 per hour/one every 8 minutes (less than the journey time along the route); • assuming a realistic construction programme, the average number of HGV construction movements along the route to Lime Down A-C is only 17 per day/less than 3 per hour/one every 25 minutes (less than the journey time along the route)

Reference	Theme	Comments/Issues Raised	Applicant's Response
			• delivery times during the construction phase are limited to those times set out in the **oCTMP [APP-287]**. There will be no HGV trips outside of these hours; • impact on hedgerow, trees and character; and • low level of existing HGVs on the route to Lime Down A-C (average number of existing HGV movements is only 20 per day, with some of these movements occurring outside of proposed construction hours set out in the **oCTMP [APP-287]** Further detail of trip generation has also been added to **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]** which will be submitted at Deadline 1 of Examination. To provide further comfort, additional information has been added to **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]** which will be submitted at Deadline 1 of Examination. This demonstrates that there is adequate carriageway width and/or passing place opportunity for two HGVs.

6.29 Mr Stephen Challis

Table 6-29 RR-3301

Reference	Theme	Comments/Issues Raised	Applicant's Response
MSC-001	Soils and Agriculture	I am strongly against the industrialisation of our countryside. Wiltshire has a number of large solar projects built or have been granted permission but not yet constructed. With the addition of this 2000 acres, Wiltshire will become an industrial county, at the expense of homegrown food production and wildlife. Its a lazy government policy that allows farm land to be covered in solar panels, there are many more suitable places to put solar panels that don't compromise food production or wildlife.	The Scheme has been designed to deliver the greatest possible benefit from the available land and the available grid connection, whilst avoiding, minimising and/or mitigating harmful environmental effects. As per the description set out in **ES Volume 1, Chapter 3: The Scheme [APP-055]** the total area within the DCO Order Limits encompasses approximately 1,237 hectares (ha). Of this, the 'Solar PV Sites' comprise approximately 749.1 ha of land. Around 479.5 ha of this land is proposed as being required for installation of solar PV, battery storage, and associated infrastructure. The remaining 269.5 ha would provide areas dedicated to ecological mitigation, measurable Biodiversity Net Gain (BNG) delivery, landscaping, offsets and agricultural land managed for environmental enhancement and habitat creation. The Applicant remains committed to delivering a Scheme that makes a meaningful contribution to the UK's transition to net zero, while also seeking to minimise adverse impacts and maximise opportunities for environmental enhancement and community benefits. Cumulative effects with other projects has been carefully considered as part of the Scheme with other projects, both existing and proposed, taken into account. In terms of the Lime Down project, a comprehensive Cumulative and In-Combination Effects Assessment has been undertaken in accordance with Planning Inspectorate Advice Note 17 and the relevant NPS EN-1, NPS EN-3 and NPS EN-5 requirements which are set out within **ES Volume 1, Chapter 21: Cumulative and In-Combination Effects [APP-074]** and associated appendices**, ES Volume 3, Appendix 21-1: Long List of In-Combination Effects and Cumulative Developments [APP-264]**. Interaction with proposed or consented but not yet built

Reference	Theme	Comments/Issues Raised	Applicant's Response
			developments has been fully explored within each of the technical assessments **[APP-059 - APP-072]** with a summary of each of these assessments provided within **ES Volume 1, Chapter 21: In-Combination and Cumulative Effects [APP-073]**. Existing schemes are captured within the baseline environment. The four-stage cumulative assessment methodology is described within **ES Volume 1, Chapter 6: EIA Methodology [APP-058]**. 358 developments were included in the **Long List [APP-264]**. 41 developments are included in the short list (and are therefore assessed) including a number of proposed solar and BESS developments. The list of developments included in the cumulative assessment was reviewed and developed in consultation with Wiltshire Council. Taking a conservative worse case approach, significant cumulative effects are identified at a limited and discrete number of receptors comprising tourism and recreation impacts during the construction phase on Corsham Park, PRoW WT|CORM|122, long path and Sustrans Cycle Route 403, and on skylark at a District level. Skylark-specific mitigation and habitat enhancement measures are incorporated into the Scheme design to reduce effects on skylark as far as practicable and are described in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061].** These include the provision of suitably large, open set-aside and grassland habitats designed to provide suitable skylark breeding and foraging conditions. These measures are illustrated in **ES Volume 2, Figure 3-4: Landscape and Ecological Mitigation Plan [APP-084]** and detailed in the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]**. Such measures have been designed to reduce the anticipated residual effects resulting from the Scheme to a Local level of geographic importance.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			The potential effects of the Scheme on agricultural land are assessed in **ES Volume 1, Chapter 17 Soils and Agriculture [APP-069]**, which considers baseline agricultural land use and quality and evaluates likely effects during construction, operation and decommissioning. The assessment confirms that the Scheme will result in a temporary and reversible loss of agricultural land during the operational period, with all land to be returned to its original use and condition as far as practicable following decommissioning. No permanent loss of agricultural land is anticipated. The Applicant does not consider that food security will be compromised by the Scheme (or solar energy more widely). The latest figures to September 2024 indicate that solar occupied around 21,200 ha of agricultural land in the UK. In 2025, 545,000 ha of arable land in England were left uncropped (source: Department for Environment, Food & Rural Affairs, Agricultural land use in England at 1 June 2025). It should also be noted that food security is not identified as an issue within the suite of Energy National Policy Statements or the National Planning Policy Framework (NPPF). Further, the Government's UK Solar Roadmap (2025) states that solar development is not considered to compromise food security, but that the climate and nature crisis poses the greatest long-term risk to food security- a risk which the Scheme directly helps to address by providing a secure, low-carbon source of electricity. As set out in Section 2 of the **Outline Decommissioning Strategy [APP-279],** post-decommissioning of the Scheme, the landowners would choose how the land is to be used and managed. The landowner may return all of the land to arable use, although it is likely that established habitats such as hedgerows

Reference	Theme	Comments/Issues Raised	Applicant's Response
			and woodland would be retained given their potential benefits to agricultural land and the wider farming estate. Potential impacts on ecology and biodiversity are fully assessed in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**. This assessment considers baseline ecological conditions and evaluates likely significant effects arising during the construction, operation and decommissioning phases of the Scheme. It identifies avoidance, mitigation and enhancement measures to address potential impacts on habitats and protected and notable species. It also identifies opportunities for ecological enhancement, including the creation and long-term management of habitats, and delivery of biodiversity net gain. The assessment concludes that, with the identified embedded and additional mitigation measures in place, no unacceptable significant adverse effects on ecology and biodiversity are anticipated. The Applicant notes that the approach to the assessment in relation to ecology and biodiversity in general is under discussion with Wiltshire Council and Natural England and is set out in the relevant Statements of Common Ground to be submitted at Deadline 1. During construction, specific measures are proposed to avoid disturbance and displacement of wildlife. These include protective buffers around sensitive habitats and features, timing restrictions on vegetation clearance, pre-construction ecological surveys, species-specific mitigation, and pollution prevention controls which are set out in the **Outline Ecological Protection and Mitigation Strategy (EPMS) [APP-284]**. Measures to protect trees and hedgerows are also set out in **ES Volume 1, Chapter 10 Arboriculture [APP-062]**. The Scheme will also result in the cessation of intensive arable farming within the Solar PV Sites. As identified in **ES Volume 1,**

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Chapter 9: Ecology and Biodiversity [APP-061], this is expected to reduce the ongoing application of herbicides and pesticides, supporting improvements in habitat quality over the operational lifetime of the Scheme. The reversion of existing arable land within the Solar PV Sites to predominantly grassland habitats can be expected to benefit a wide range protected and notable species, as identified in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**. Mitigation and enhancement measures are detailed in the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]** and the **Outline Ecological Protection and Mitigation Strategy (OEPMS) [APP-284]**, which set out habitat creation, species protection measures, buffer zones and long-term ecological management. The preparation, approval and implementation of the detailed Landscape and Ecological Management Plan, substantially in accordance with the **OLEMP [APP-283]**, are secured through Requirement 7 in Schedule 2 of the **Draft Development Consent Order [APP-016]**. The preparation, approval and implementation of the detailed Ecological Protection and Mitigation Strategy, substantially in accordance with the **OEPMS [APP-284]**, are secured through Requirement 8 in Schedule 2 of the **Draft Development Consent Order [APP-016]**. These requirements ensure that ecological protection and enhancement measures are delivered and maintained throughout construction and operation of the Scheme. **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]** explains how brownfield land, industrial land, previously developed land, and low-grade agricultural land were considered, in accordance with policy. As set out in **ES Volume 3, Appendix 4-1: Site Selection**

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Assessment Report [APP-185] the Applicant reviewed brownfield land register for local authorities within the area of search including Wiltshire Council, South Gloucestershire Council, Bath and Northeast Somerset Council, and Somerset Council. The assessment concluded that there were no brownfield sites within the search area of sufficient size to accommodate a large-scale solar development, either individually or cumulatively. The sites assessed were too small to support the proposed Scheme and were largely allocated for housing or mixed-use development, in line with local planning policies, thereby creating a conflict with the intended use for renewable energy infrastructure. Therefore, it was concluded that there was no available or suitable brownfield land for the purposes of the Scheme.

6.30 Darren Rawlings

Table 6-30 RR-0976

Reference	Theme	Comments/Issues Raised	Applicant's Response
DR-001	Hydrology, Flood Risk and Drainage	If permission were to be granted the risk of flooding to my own home would become such that it would be uninhabitable. In the 22 years I have lived here we have already had to leave the property for 3 winters. I am not unique in being put at jeopardy. I have carefully considered whether jeopardy is an inappropriately emotional word to use before typing it. It is not inappropriate. We are on the absolute cusp of sustainability and pouring acres of hardstanding upstream without facilitating the rapid egress of water or better retention and slower dispersal is unconscionable. I see no such provision in the application. A few attenuation pools won't cut it. More land needs to be acquired and used for pooling and controlled release if the plan is to go ahead.	The Applicant acknowledges the lived experience of flooding affecting the property and understands the seriousness of the concern raised. Existing flooding occurs under baseline conditions and is recognised within the assessment. The flood risk and drainage assessment has been undertaken in accordance with national and local policy and concludes that the Scheme would not increase flood risk elsewhere or render existing properties more vulnerable to flooding. The assessment considers fluvial, surface water and construction-phase mechanisms and does not rely on Flood Zone mapping alone. **ES Volume 1, Chapter 11 Hydrology, Flood Risk and Drainage [APP-063]**. The Applicant does not agree that the Scheme introduces "*acres of hardstanding*" that would accelerate runoff. The drainage strategy distinguishes between panelled areas, where rainfall drains to ground beneath and between panels, and limited areas of hardstanding associated with supporting electrical infrastructure, where engineered and controlled drainage is provided. National policy recognises that ground-mounted solar PV generally drains to ground and does not create significant drainage impacts where ground cover is maintained (NPS EN-3 paragraph 3.10.75). The Scheme is designed on the basis that there can be no increase in off-site flood risk, with drainage controls secured through the DCO Requirements. **Draft Development Consent Order [APP-016]**. Measures to manage surface water runoff and drainage are set out in the outline drainage and construction management plans (**ES Volume 3, Appendix 11: Flood Risk Assessment and Drainage Strategy [APP-210 to APP-218] and Outline Construction Environmental Management Plan [APP-277]** accompanying the Application. Where drainage measures are necessary, these include permeable surfacing, infiltration

Reference	Theme	Comments/Issues Raised	Applicant's Response
			features, swales and attenuation storage to manage surface water and maintain greenfield runoff behaviour, as applicable. Consistent with NPS EN-3 paragraph 2.10.84, these controls distinguish between solar PV panel areas, which drain to the existing ground and do not generally give rise to significant drainage effects, and associated infrastructure where runoff controls are required. The preparation, approval and implementation of the detailed drainage and construction management plans, substantially in accordance with the outline plans, are secured through Schedule 2 of the **Draft Development Consent Order [APP-016]**. This secures delivery and maintenance of the drainage strategy for Scheme infrastructure, together with soil and water management controls during construction, ensuring there is no material increase in off-site flood risk over the lifetime of the Scheme. The Applicant does not agree that additional land acquisition or large-scale flood storage is required. The assessment demonstrates that attenuation, flow routing and infiltration measures within the Site are sufficient to ensure no increase in downstream flood risk, subject to detailed design approval at discharge. No amendments to the application documents are required.
DR-002	Soils and Agriculture	Clearly this would have the effect of rendering the nation even less food secure but I understand the balance that needs to be struck between achieving food security and energy security. If we are to have this application approved for the sake of energy security we need to be prepared to write off enough agricultural production to enable the extant built	The potential effects of the Scheme on agricultural land are assessed in **ES Volume 1, Chapter 17 Soils and Agriculture [APP-069]**, which considers baseline agricultural land use and quality and evaluates likely effects during construction, operation and decommissioning. The assessment confirms that the Scheme will result in a temporary and reversible loss of agricultural land during the operational period, with all land to be returned to its original use and condition as far as practicable following decommissioning. No permanent loss of agricultural land is anticipated.

Reference	Theme	Comments/Issues Raised	Applicant's Response
		environment to be put at no more risk than it already is at.	The Applicant does not consider that food security will be compromised by the Scheme (or solar energy more widely). The latest figures to September 2024 indicate that solar occupied around 21,200 ha of agricultural land in the UK. In 2025, 545,000 ha of arable land in England were left uncropped (source: Department for Environment, Food & Rural Affairs, Agricultural land use in England at 1 June 2025). It should also be noted that food security is not identified as an issue within the suite of Energy National Policy Statements or the National Planning Policy Framework (NPPF). Further, the Government's UK Solar Roadmap (2025) states that solar development is not considered to compromise food security, but that the climate and nature crisis poses the greatest long-term risk to food security- a risk which the Scheme directly helps to address by providing a secure, low-carbon source of electricity. As set out in Section 2 of the **Outline Decommissioning Strategy [APP-279],** post-decommissioning of the Scheme, the landowners would choose how the land is to be used and managed. The landowner may return all of the land to arable use, although it is likely that established habitats such as hedgerows and woodland would be retained given their potential benefits to agricultural land and the wider farming estate.

6.31 David Taylor

Table 6-31 RR-1069

Reference	Theme	Comments/Issues Raised	Applicant's Response
DT-001	Landscape and Visual	The area where Lime Down is proposed is an area of outstanding natural beauty. The scale of the project in this area is absolutely ridiculous and will destroy the beauty of the area for decades to come. As a keen cyclist the roads are narrow; the HGVs using the lanes around the site will endanger the lives of cyclists who like me enjoy the beauty of this area.	An assessment of landscape and visual effects is provided in the Landscape and Visual Impact Assessment (LVIA) presented in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**. The LVIA assesses effects on identified landscape and visual receptors, including residential properties and users of public rights of way, and identifies where significant effects may occur. The **LVIA [APP-060]** found no significant long term visual effects to Residential Properties as a consequence of the Scheme. The scale of development within the Order Limits has been significantly reduced from the layout assessed in the Preliminary Environmental Information Report (PEIR) through an iterative design process undertaken in response to consultation and in accordance with the mitigation hierarchy to avoid, reduce and mitigate adverse effects. As part of this design evolution, panels along the edge of the Cotswolds National Landscape and along the Fosse Way have been removed. Mitigation measures to address landscape and visual effects are set out in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**, Figure 3-4-1 to 3-4-5.2 **Landscape and Ecology Mitigation Plan [APP-084]** and detailed within the **Outline Landscape and Ecological Mitigation Plan (LEMP) [APP-283]** and the **Outline Ecological Protection and Mitigation Strategy (OEPMS) [APP-284]**. These documents include proposals for new and enhanced planting, retention of existing hedgerows and woodland, and landscape integration measures to reduce visual effects over time. In addition, the Scheme design incorporates minimum offsets from existing landscape features, including residential properties, ancient woodland, woodland, hedgerows, public rights of way and watercourses, to further limit visual impacts.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			The preparation, approval and implementation of detailed landscape and ecological management plans, substantially in accordance with the **OLEMP [APP-283]** and **OEPMS [APP-284]**, are secured through requirements in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that the identified mitigation measures are delivered and maintained throughout the lifetime of the Scheme. The Scheme has been designed to deliver the greatest possible benefit from the available land and the available grid connection, whilst avoiding, minimising and/or mitigating harmful environmental effects. As per the description set out in **ES Volume 1, Chapter 3: The Scheme [APP-055]** the total area within the DCO Order Limits encompasses approximately 1,237 hectares (ha). Of this, the 'Solar PV Sites' comprise approximately 749.1 ha of land. Around 479.5 ha of this land is proposed as being required for installation of solar PV, battery storage, and associated infrastructure. The remaining 269.5 ha would provide areas dedicated to ecological mitigation, measurable Biodiversity Net Gain (BNG) delivery, landscaping, offsets and agricultural land managed for environmental enhancement and habitat creation. The Applicant remains committed to delivering a Scheme that makes a meaningful contribution to the UK's transition to net zero, while also seeking to minimise adverse impacts and maximise opportunities for environmental enhancement and community benefits. The potential effects of construction traffic on highway safety and accident risk are assessed in **ES Volume 1, Chapter 13: Transport and Access [APP-065]**, which considers changes in traffic flows, HGV movements and accident risk on the local road network, including non-motorised users. Links experiencing traffic

Reference	Theme	Comments/Issues Raised	Applicant's Response
			increases above defined assessment thresholds were taken forward for detailed analysis. Supporting technical evidence is provided in **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]**, which includes an assessment of baseline accident data and predicted changes in collision risk arising from construction traffic. The assessment concludes that the level of construction traffic associated with the Scheme is unlikely to materially affect road safety on links within the Study Area, and no significant adverse effects on accident risk are anticipated. Mitigation measures to manage construction traffic safely are set out in the **Outline Construction Traffic Management Plan (Outline CTMP) [APP-287]**, which includes defined vehicle routing, delivery scheduling and coordination with the local highway authority. The preparation, approval and implementation of the final CTMP, substantially in accordance with the **Outline CTMP [APP-287]**, are secured through Requirement 15 of Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring construction traffic is managed safely throughout the construction phase of the Scheme.

6.32 Johnathan T Seymour-Williams

Table 6-32 RR-2245

Reference	Theme	Comments/Issues Raised	Applicant's Response
JTS-001	Climate Change and Energy Need	The project is ill conceived financially questionable and in any event is carbon positive over the first 50 years	It is not clear how the 2076 year of offset conclusion has been reached. **ES Volume 1, Chapter 7: Climate Change [APP-059]** assesses greenhouse gas (GHG) emissions across the full life cycle of the Scheme, including the manufacture, transport, installation, operation, maintenance and decommissioning of Scheme components. This assessment includes embodied carbon associated with materials and components, as well as operational emissions savings arising from renewable electricity generation. The assessment concludes that, while emissions are associated with the manufacture and construction of the Scheme, these are outweighed over time by the carbon savings achieved through the displacement of fossil fuel-derived electricity generation. When considered over its operational lifetime, the Scheme would result in a net reduction in GHG emissions compared to a 'without Scheme' scenario and would make a meaningful contribution to the UK's legally binding carbon budgets and transition to net zero.

6.33 Mairead Harrington

Table 6-33 RR-2925

Reference	Theme	Comments/Issues Raised	Applicant's Response
MAH-001	Description and DCO Process	Registering my dissatisfaction and horror at the proposed solar development at Lime Down	The Applicant remains committed to delivering a Scheme that makes a meaningful contribution to the UK's transition to net zero, while also seeking to minimise adverse impacts and maximise opportunities for environmental enhancement and community benefits. The Applicant is confident that the proposed management and mitigation measures set out in the **ES [APP-052 to APP-265]** are comprehensive and robust and that the Scheme aligns with national and local planning policy; this is outlined in the **Planning Statement [APP-267]**. Of particular relevance are Annex A: National Policy Statement Accordance Tables and Annex B: Local Policy Accordance Tables, of the Planning Statement which set out an appraisal of the Scheme against the policies.

6.34 Graham Lee

Table 6-34 RR-1717

Reference	Theme	Comments/Issues Raised	Applicant's Response
GL-001	Soils and Agriculture	I wish to object to this solar park project on the basis of its size and the damage it will cause to good agricultural land. It will destroy the beautiful and historic area. Solar panels should be limited to installations on existing industrial buildings.	The Scheme has been designed to deliver the greatest possible benefit from the available land and the available grid connection, whilst avoiding, minimising and/or mitigating harmful environmental effects. As per the description set out in **ES Volume 1, Chapter 3: The Scheme [APP-055]** the total area within the DCO Order Limits encompasses approximately 1,237 hectares (ha). Of this, the 'Solar PV Sites' comprise approximately 749.1 ha of land. Around 479.5 ha of this land is proposed as being required for installation of solar PV, battery storage, and associated infrastructure. The remaining 269.5 ha would provide areas dedicated to ecological mitigation, measurable Biodiversity Net Gain (BNG) delivery, landscaping, offsets and agricultural land managed for environmental enhancement and habitat creation. The Applicant remains committed to delivering a Scheme that makes a meaningful contribution to the UK's transition to net zero, while also seeking to minimise adverse impacts and maximise opportunities for environmental enhancement and community benefits. An assessment of landscape and visual effects are presented in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**. The Landscape and Visual Impact Assessment (LVIA) assesses effects on identified landscape and visual receptors, including residential properties, users of public rights of way and roads, and identifies where significant effects may occur. The **LVIA [APP-060]** found no significant long term visual effects to residential properties as a consequence of the Scheme.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			The visual effects of the Scheme are summarised in **ES Volume 3, Appendix 8-3-3 [APP-192]**. Temporary Major/Moderate and Moderate Adverse effects on visual receptors have been recorded across the Scheme during construction and at Year 1. However, for the majority of these receptors, the effects reduce to non –significant levels as a result of the embedded mitigation measures which are set out in Section 8.9 of **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]** and include landscape buffers, retention of existing hedgerows and woodland, and new planting to provide screening and integration over time. The assessment also identifies that there would be some long-term significant effects on the visual amenity of users of some localised footpaths, as a result of the Scheme. This predominantly relates to locations where footpaths diagonally cross fields and mitigation planting would be inappropriate to landscape character and the legacy landscape. Those receptors which would experience Significant Long Term Visual Effects are listed in Table 8-30 of the **LVIA [APP-060].** The scale of development within the Order Limits has been significantly reduced from the layout assessed in the Preliminary Environmental Information Report (PEIR) through an iterative design process undertaken in response to consultation and in accordance with the mitigation hierarchy to avoid, reduce and mitigate adverse effects. As part of this design evolution, panels along the edge of the Cotswolds National Landscape and along the Fosse Way have been removed. Mitigation measures to address landscape and visual effects are set out in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**, **Figure 3-4-1 to 3-4-5.2 Landscape and Ecology Mitigation Plan [APP-084]** and secured within the **Outline Landscape and Ecological Mitigation Plan**

Reference	Theme	Comments/Issues Raised	Applicant's Response
			(LEMP) [APP-283] and the **Outline Ecological Protection and Mitigation Strategy (OEPMS) [APP-284]**. These documents include proposals for new and enhanced planting, retention of existing hedgerows and woodland, and landscape integration measures to reduce visual effects over time. In addition, the Scheme design incorporates minimum offsets from existing landscape features, including residential properties, ancient woodland, woodland, hedgerows, public rights of way and watercourses, to further limit visual impacts. Although these measures reduce the effects of the Scheme on nearly all receptors, as noted above there are 10 receptors which would experience Significant Visual Effects for the duration of the Scheme as set out Table 8-30 of the **LVIA [APP-060]**. Mitigation measures to address landscape and visual effects are set out in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**, **Figure 3-4-1 to 3-4-5.2 Landscape and Ecology Mitigation Plan [APP-084]**. The preparation, approval and implementation of detailed landscape and ecological management plans, substantially in accordance with the **OLEMP [APP-283]** and **OEPMS [APP-284]**, are secured through requirements in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that the identified mitigation measures are delivered and maintained throughout the lifetime of the Scheme. An assessment of the potential effects of the Scheme on soils and agricultural land is provided in **ES Volume 1, Chapter 17 Soils and Agriculture [APP-069]**. This chapter considers baseline agricultural land quality, including Best and Most Versatile (BMV) land, and assesses likely significant effects arising from construction, operation and decommissioning of the Scheme, together with embedded mitigation measures.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			The areas of each Agricultural Land Classification (ALC) grade affected by the Scheme are set out in **ES Chapter 17 [APP-069]**, Section 17.7. Of the agricultural land within the Solar PV Sites, approximately 477.4 hectares (around 67%) is classified as Subgrade 3b or Grade 4 and is therefore not BMV land. There is no Grade 1 land, around 30.8 hectares (approximately 4%) of Grade 2 land, and approximately 209.3 hectares (around 29%) of Subgrade 3a land. The distribution of ALC grades is shown in **ES Volume 2, Figure 17-2: Agricultural Land Classification Mapping [APP-172]**. The Applicant has had regard to agricultural land quality in the design and site selection process and has sought, where practicable, to locate infrastructure on lower quality land. The Scheme will result in a temporary but long-term and reversible loss of agricultural land for the operational life of the Scheme. As set out in **ES Chapter 17 [APP-069]**, Section 17.10, this gives rise to a temporary, long-term moderate adverse effect on agricultural land overall, and a temporary, long-term major/moderate adverse effect on BMV land, both of which are assessed as significant. These effects are fully reported in the ES and are a matter for the Secretary of State to weigh in the planning balance against the need for the Scheme and its wider benefits. There are no significant permanent effects on agricultural land, as all land will be returned to its original use and condition as far as practicable following decommissioning. The Applicant notes that the approach to assessing the quality of the agricultural land is being discussed with Natural England and is set out in the relevant **Statement of Common Ground** to be submitted at Deadline 1. Measures to avoid and minimise effects on soils and agricultural land are embedded within the Scheme design and secured through the DCO. These include the preparation and

Reference	Theme	Comments/Issues Raised	Applicant's Response
			implementation of a **Soil Resources Management Plan (SRMP) [APP-280]**, which will control soil handling, storage and reinstatement during construction, operation and decommissioning, and a requirement to prepare and implement a Decommissioning Strategy in accordance with the **Outline Decommissioning Strategy [APP-279]**. Through the establishment and maintenance of long-term grassland beneath and between the solar arrays, soil health, quality and structure are anticipated to improve over the lifetime of the Scheme, resulting in a temporary, moderate beneficial effect on soil resources at decommissioning, which is assessed as significant (**ES Chapter 17**, Sections 17.10 and 17.12). In relation to suggestions that brownfield land or alternative locations should be used, including on the rooftops of existing industrial buildings, these matters are addressed in **ES Volume 1, Chapter 4 Alternatives and Design Evolution** and in the **Statement of Need [APP-056 and APP-266]**. The Applicant has considered alternatives, including previously developed land and other forms of solar deployment, as part of the site selection and design evolution process. As shown in Table 2-2 of **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]**, the Applicant has considered previously developed land/brownfield land over 1 hectare within the area of search, based on the brownfield land registers of the relevant Local Planning Authorities, and concluded that none of the sites are large enough to provide a viable land parcel of at least 40 ha and sites were not considered to be available as they have planning permission for residential development and/or are allocated for residential/mixed use development. National policy and government guidance, as set out in the **Statement of Need [APP-266]**, recognise that while rooftop and smaller-scale solar installations are an important part of the

Reference	Theme	Comments/Issues Raised	Applicant's Response
			energy mix, they cannot alone meet the scale of capacity required to achieve clean power and net zero objectives. Large-scale ground-mounted solar therefore remains necessary in addition to, not instead of, rooftop solar. The potential effects of the Scheme on cultural heritage, including archaeological assets dated to the Roman and medieval periods, are fully assessed in **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, supported by detailed technical appendices in **ES Volume 3, Appendices 12-1 to 12-7 [APP-219 to APP-231]**. The chapter considers baseline conditions, identifies built and archaeological heritage assets within the study area, and assesses likely effects during construction, operation and decommissioning, including effects on setting. The chapter concluded that, following mitigation, the residual effects on any archaeological assets including Roman and medieval period remains, would be neutral/negligible and therefore not significant (see **Volume 3, Appendix 12-8 Cultural Heritage Impact Assessment Tables [APP-232]**). The assessment is underpinned by extensive desk-based research, geophysical survey and evaluation trenching, as detailed in **ES Volume 3, Appendix 12-2: Archaeological Desk-Based Assessments [APP-220], Appendix 12-4: Archaeological Geophysical Survey Reports [APP-224], and Appendix 12-5: Interim Evaluation Trial Trenching Reports [APP-225].** The Applicant notes that the approach to the assessment has been agreed with Wiltshire Council and the methodology for the mitigation strategy is being discussed with Wiltshire Council, as is set out in the relevant **Statement of Common Ground** to be submitted at Deadline 1. Embedded mitigation measures to avoid or reduce harm to

Reference	Theme	Comments/Issues Raised	Applicant's Response
			heritage assets are set out in Section 12.9 of **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, with additional mitigation measures detailed in Section 12.11. An overarching archaeological mitigation strategy is provided in **ES Volume 3, Appendix 12-6: Outline Archaeological Mitigation Strategy [APP-230]**, which sets out the framework for further archaeological investigation, recording and protection where ground disturbance cannot be avoided. The preparation, approval and implementation of detailed archaeological Written Schemes of Investigation, substantially in accordance with the Outline Archaeological Mitigation Strategy, are secured through Requirement 12 of Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that appropriate protection, recording and mitigation are delivered before and during construction.

6.35 Clyde Stanley Burgess

Table 6-35 RR-0916

Reference	Theme	Comments/Issues Raised	Applicant's Response
CSB-001	Soils and Agriculture	I object to the proposed Lime Down project for the following reasons: Loss of prime agricultural land and impact on public footpath The proposed development is located on prime agricultural land that is currently used productively for farming. A public footpath runs through the centre of our field and is used daily by local villagers. Development of this site would permanently alter the land, resulting in the loss of its agricultural value. Once disturbed, the land will not be able to be restored to its current condition, directly impacting the our ability to grow crops, feed livestock, and earn a living from our land. The disruption to the public footpath will also negatively affect regular village use and access.	<u>Use of Agricultural Land</u> An assessment of the potential effects of the Scheme on soils and agricultural land is provided in **ES Volume 1, Chapter 17 Soils and Agriculture [APP-069]**. This chapter considers baseline agricultural land quality, including Best and Most Versatile (BMV) land, and assesses likely significant effects arising from construction, operation and decommissioning of the Scheme, together with embedded mitigation measures. The areas of each Agricultural Land Classification (ALC) grade affected by the Scheme are set out in **ES Chapter 17 [APP-069]**, Section 17.7. Of the agricultural land within the Solar PV Sites, approximately 477.4 hectares (around 67%) is classified as Subgrade 3b or Grade 4 and is therefore not BMV land. There is no Grade 1 land, around 30.8 hectares (approximately 4%) of Grade 2 land, and approximately 209.3 hectares (around 29%) of Subgrade 3a land. The distribution of ALC grades is shown in **ES Volume 2, Figure 17-2: Agricultural Land Classification Mapping [APP-172]**. The Applicant has had regard to agricultural land quality in the design and site selection process and has sought, where practicable, to locate infrastructure on lower quality land. The Scheme will result in a temporary but long-term and reversible loss of agricultural land for the operational life of the Scheme. As set out in **ES Chapter 17 [APP-069]**, Section 17.10, this gives rise to a temporary, long-term moderate adverse effect on agricultural land overall, and a temporary, long-term major/moderate adverse effect on BMV land, both of which are assessed as significant. These effects are fully reported in the ES and are a matter for the Secretary of State to weigh in the planning balance against the need for the Scheme and its wider benefits. There are no significant permanent effects on agricultural land, as all land will be returned to its original use and

Reference	Theme	Comments/Issues Raised	Applicant's Response
			condition as far as practicable following decommissioning. The Applicant notes that the approach to assessing the quality of the agricultural land is being discussed with Natural England and is set out in the relevant **Statement of Common Ground** to be submitted at Deadline 1. Measures to avoid and minimise effects on soils and agricultural land are embedded within the Scheme design and secured through the DCO. These include the preparation and implementation of a **Soil Resources Management Plan (SRMP) [APP-280]**, which will control soil handling, storage and reinstatement during construction, operation and decommissioning, and a requirement to prepare and implement a Decommissioning Strategy in accordance with the **Outline Decommissioning Strategy [APP-279]**. Through the establishment and maintenance of long-term grassland beneath and between the solar arrays, soil health, quality and structure are anticipated to improve over the lifetime of the Scheme, resulting in a temporary, moderate beneficial effect on soil resources at decommissioning, which is assessed as significant (**ES Chapter 17**, Sections 17.10 and 17.12). <u>Public Rights of Way and Recreational Access</u> A detailed assessment of the likely significance of effects from the Scheme on the use and desirability of individual PRoW, and recreational access to the countryside, has been included in the **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** and **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]**. This assessment considers the impact on individual recreational routes – be that practically in their use, and their enjoyment and

Reference	Theme	Comments/Issues Raised	Applicant's Response
			desirability. The Applicant confirms that the majority of significant adverse effects can be mitigated, however understands that some significant adverse effects to users of PROWs and unsurfaced roads in Lime Down E cannot be mitigated further during construction. No significant residual effects are anticipated during the operational phase of the Scheme. The Applicant notes that the assessment of PROW impacts and mitigation is under discussion with Wiltshire Council's Countryside Access Team and is set out in the **Statement of Common Ground with Wiltshire Council** to be submitted at Deadline 1. The Applicant confirms that existing PRoW are to be controlled within the Scheme design with PRoW management strategies set out in the **Outline Public Rights of Way and Permissive Paths Management Plan (oPROWPPMP) [APP-282]**. These are confirmed as embedded mitigation measures in Section 16.9 of ES Chapter 16. New permissive access routes have been included in the Scheme design, shown as Work No.10 on the **Works Plan [APP-007]** and shown on **ES Volume 2, Figure 3-4: Landscape and Ecology Mitigation Plan [APP-283]**. These are considered as additional mitigation and enhancement measures in Section 16.11 of **ES Chapter 16 [APP-068]**. The **oPROWPPMP [APP-282]** is secured through Requirement 16 of Schedule 2 of the **Draft DCO [APP-016]**. The preparation, approval and implementation of the detailed CEMP and CTMP, substantially in accordance with the outline plans, are secured through Requirements 13 and 15 respectively in Schedule 2 of the **Draft Development Consent Order [APP-**

Reference	Theme	Comments/Issues Raised	Applicant's Response
			016], ensuring that impacts on PRoW and recreational routes are appropriately managed during construction.
CSB-002	Transport and Access	Unsuitability of the village and road network for heavy construction traffic: The village is not equipped to accommodate the volume or size of heavy machinery and construction vehicles associated with this project. Roads through the village are narrow, lack clear road markings, and were not designed for frequent use by large vehicles. In addition, there is a lack of off-street parking throughout the village, which will significantly worsen congestion and create safety concerns for residents, pedestrians, and other road users. In summary, the proposed Lime Down project would cause permanent harm to valuable agricultural land, disrupt a well-used public footpath, and place unacceptable strain on village infrastructure and road safety. For these reasons, I strongly object.	The assessment presented in Annex H of **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]** demonstrates adequate carriageway width or frequency of passing place opportunity to pass at least an HGV and a light vehicle as requested in comments provided by Wiltshire Council in its response (August 2025) to the Transport Assessment Scoping Note and confirmed in Paragraph 4 of 'Appendix A - Highways and Transport Document Review - Detailed Comments'. This confirms that no passing bay or widening improvements are needed to accommodate these movements on the construction route outside of the Order Limits. The distances between passing points outside of the Order Limits are all within 150 m with forward visibility extending to the next passing point and beyond. This is within the generally accepted distance of 200 metres. As set out in the **Outline Construction Traffic Management Plan (Outline CTMP) [APP-287]**, a booking system will be set up to manage arrivals and departures to the Order Limits. This will be implemented in coordination with banksmen, which will be able to hold back any cross-over, should there be any delays on the roads. This will prevent HGVs generated by the Scheme passing each other in opposite directions on the local roads forming part of the construction routes and will be confirmed as part of the final CTMP. Regarding routes through the Hulavington area, excessive widening of existing rural routes to allow two HGVs to pass would be over engineering, because of the following reasons: • temporary nature of the construction period;

Reference	Theme	Comments/Issues Raised	Applicant's Response
			• trip generation of 76 HGVs on the route to Lime Down D is an estimate of the deliveries on a peak day, so does not represent a daily average; • trip generation of 76 HGVs on the route to Lime Down D is based on the worst-case assumptions, including but not limited to, all phases and Solar PV Sites being constructed simultaneously and a 50% uplift; • average number of HGV construction movements along the route to Lime Down D is only 50 per day/7 per hour/one every 8 minutes (less than the journey time along the route); - assuming a realistic construction programme, the average number of HGV construction movements along the route to Lime Down D is only 32 per day/5 per hour/one every 13 minutes (less than the journey time along the route); • delivery times during the construction phase are limited to those times set out in the **Outline CTMP [APP-287]**. There will be no HGV construction trips outside of these hours; • there would be a much greater impact on hedgerow, trees and character; and • low level of existing HGVs on the route to Lime Down D (average number of existing HGV movements is only 46 per day, with some of these movements occurring outside of proposed construction hours set out in the **Outline CTMP [APP-287]**). Regarding routes through the Foss Way area, excessive widening of existing rural routes to allow two HGVs to pass would be over engineering, because of the following reasons: temporary nature of the construction period;

Reference	Theme	Comments/Issues Raised	Applicant's Response
			• trip generation of 16 HGVs on the route to Lime Down A is an estimate of the deliveries on a peak day, so does not represent a daily average; • trip generation of 16 HGVs on the route to Lime Down A is based on the worst-case assumptions, including but not limited to, all phases and Solar PV Sites being constructed simultaneously and a 50% uplift; • average number of HGV movements along the route to Lime Down A is only 10 per day/less than 2 per hour/one every 42 minutes (less than the journey time along the route), with the construction phase for Lime Down Site A only lasting 9 months • delivery times during the construction phase are limited to those times set out in the **Outline CTMP [APP-287]**. There will be no HGV trips outside of these hours; • impact on hedgerow, trees and character; and • low level of existing HGVs on the route to Lime Down A (average number of existing HGV movements is only 40 per day, with some of these movements occurring outside of proposed construction hours set out in the **Outline CTMP [APP-287]**) Regarding routes through the Alderton area, excessive widening of existing rural routes to allow two HGVs to pass would be over engineering, because of the following reasons: • temporary nature of the construction period; • trip generation of 50 HGVs on the route to Lime Down A-C is an estimate of the deliveries on a peak day, so does not represent a daily average; • trip generation of 50 HGVs on the route to Lime Down A-C is based on the worst-case assumptions, including but not limited to, all phases and Solar PV Sites being constructed simultaneously and a 50% uplift;

Reference	Theme	Comments/Issues Raised	Applicant's Response
			• average number of HGV construction movements along the Route to Lime Down A-C route is only 32 per day/7 per hour/one every 8 minutes (less than the journey time along the route); • assuming a realistic construction programme, the average number of HGV construction movements along the route to Lime Down A-C is only 17 per day/less than 3 per hour/one every 25 minutes (less than the journey time along the route); • delivery times during the construction phase are limited to those times set out in the **oCTMP [APP-287]**. There will be no HGV trips outside of these hours; • impact on hedgerow, trees and character; and • low level of existing HGVs on the route to Lime Down A-C (average number of existing HGV movements is only 20 per day, with some of these movements occurring outside of proposed construction hours set out in the **oCTMP [APP-287]**. Further detail of trip generation has also been added to **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]** which will be submitted at Deadline 1 of Examination. To provide further comfort, additional information has been added to **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]** which will be submitted at Deadline 1 of Examination. This demonstrates that there is adequate carriageway width and/or passing place opportunity for two HGVs.

6.36 Piers Dibben

Table 6-36 RR-3823

Reference	Theme	Comments/Issues Raised	Applicant's Response
PD-001	Cultural Heritage Transport and Access	-Rodbourne is a conservation area, with the countryside around the village being of key importance to its setting and importance. It is described in as the jewell in teh Crown in the Malmesbury Town Plan. To ruin the setting is to destroy the value of its conservation status. (Redacted) of limedown E EVERY day. It is a beautiful drovers track used for 100's o years by people, farm animals, and the general farming practice of the time. It is not designed nor appropriate for large lorries and machinary on a daily basis - any value as a track for people will be destroyed. The distance of E to the eventual Melksham station is over 22km. The destruction and chaos of digging the cable this far is simply out of proportion to the benefit it will bring. The overall setting of the limedown project is wrong. Its an historic area with numerous sites of national architectural inportance. There is loads more i can say, but will keep this for the further comments part of the process.	**ES Volume 1, Chapter 12: Cultural Heritage [APP-064],** supported by **Appendix 12.1: Heritage Statement [APP-219]**, has assessed the potential impact of the scheme on Rodbourne Conservation Area, and where required appropriate mitigation has been proposed (see Section 12.9 of **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]** for embedded mitigation). As stated in **Appendix 12.1: Heritage Statement [APP-219]**, embedded mitigation including the removal of Fields E5 and E8 from the Scheme Order Limits, removal of panels from Fields E7, E9 and E10, offsets to the PROW and enhanced screening of existing hedgerows are considered sufficient mitigation to remove any adverse impacts to the Conservation Area. The potential effects of the Scheme on cultural heritage, are fully assessed in **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, and the assessment is underpinned by extensive desk-based research, geophysical survey and evaluation trenching, as detailed in **ES Volume 3, Appendix 12-2: Archaeological Desk-Based Assessments [APP-220], Appendix 12-4: Archaeological Geophysical Survey Reports [APP-224], and Appendix 12-5: Interim Evaluation Trial Trenching Reports [APP-225].** These investigations specifically consider areas of known archaeological potential, including along the cable route corridor, and inform the identification of mitigation where required. Embedded mitigation measures to avoid or reduce harm to heritage assets are set out in Section 12.9 of **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, with additional mitigation measures detailed in Section 12.11. An overarching archaeological mitigation strategy is provided in **ES Volume 3, Appendix 12-6: Outline Archaeological Mitigation Strategy [APP-230]**, which sets out the framework for further archaeological investigation, recording and protection where ground disturbance cannot be avoided.

Reference	Theme	Comments/Issues Raised	Applicant's Response
		Kind regards Piers Dibben	The preparation, approval and implementation of detailed archaeological Written Schemes of Investigation for each part of the Proposed Development, substantially in accordance with **Appendix 12-6 Outline Archaeological Mitigation Strategy [APP-230]**, are secured through Requirement 12 of Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that appropriate protection, recording and mitigation are delivered during the relevant part of the Proposed Development. The potential effects of construction traffic on the local highway network are assessed in **ES Volume 1, Chapter 13: Transport and Access [APP-065]**, which considers construction vehicle movements, traffic volumes, road safety and effects on road users. This included the capacity of local roads and infrastructure to accommodate construction vehicles with consideration of construction traffic volumes, vehicle types, route suitability, and network performance. The assessment concludes that the level of construction traffic associated with the Scheme is unlikely to materially affect road safety on links within the Study Area, and no significant adverse effects on accident risk are anticipated. The assessment additionally concludes that with appropriate mitigation such as the Construction Traffic Management Plan in place to manage construction vehicle movements, there would be no significant adverse impacts on the local highway network during the construction, operation maintenance, and decommissioning phases of the Scheme. An **Outline Construction Traffic Management Plan (Outline CTMP) [APP-287]** has been prepared and submitted with the DCO application. The aim of the CTMP is to ensure that the effect of the construction phase on the local highway network is minimised. The **Outline CTMP [APP-287]** secures measures to coordinate construction deliveries by HGVs to arrive and depart between

Reference	Theme	Comments/Issues Raised	Applicant's Response
			09:30 and 16:30 where possible, to avoid peak network hours of 08:00–09:00 and 17:00–18:00. It also includes a community liaison element to keep local communities informed about the construction process and to provide a contact for feedback should any issues arise. Compliance with the CTMP will be monitored by the Developer, Contractor and Wiltshire Council as local highway authority. The preparation, approval and implementation of the final CTMP, substantially in accordance with the outline CTMP, are secured through Requirement 15 of Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring construction traffic impacts are appropriately managed throughout the construction phase of the Scheme. The Applicant confirms that the existing National Grid Melksham substation has been identified as the point of connection. This decision was based on available capacity, network resilience, and strategic grid planning. As explained in **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]**, an initial search area was identified at a 5 km radius from the POC, however this was later expanded as no suitable and available sites within 5 km were identified. The search area was enlarged incrementally to a 20 km radius which is considered by the Applicant to be a viable cable connection distance for a solar project of this scale. The POC and 20 km search area is shown on Figure 1, Annex C of **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]**. Further, from an operational perspective, high voltage electricity transmission at 400kV in this case, is specifically designed to minimise energy losses over long distances. As such, the approximate 20km distance involved results in negligible losses. More details on how the Cable Route Corridor has been located and designed can be found in **ES Volume 1,**

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Chapter 4: Alternatives and Design Evolution [APP-056]. Several factors were considered designed to take a direct route whilst following existing features, such as roads, and avoiding sensitive receptors as far as practicable, such as habitat designations, residential and commercial properties, heritage assets, and a large number of land interests. The assessments set out in the various chapters of the **ES [APP-052 to APP-265]** detail what impacts are expected as a result of the Scheme based on the minimum and maximum parameters of the Scheme, and the mitigation and enhancement measures that are proposed to reduce these impacts.

6.37 Katherine Ruth Brunt

Table 6-37 RR-2611

Reference	Theme	Comments/Issues Raised	Applicant's Response
KRB-001	Socio-Economics, Tourism and Recreation	I am a working farmer and am deeply saddened by the potential loss of working farmland ,which would include the ability to plant trees and biodiverse crops in the future!	An assessment of the potential effects of the Scheme on soils and agricultural land is provided in **ES Volume 1, Chapter 17 Soils and Agriculture [APP-069]**. This chapter considers baseline agricultural land quality, including Best and Most Versatile (BMV) land, and assesses likely significant effects arising from construction, operation and decommissioning of the Scheme, together with embedded mitigation measures. The areas of each Agricultural Land Classification (ALC) grade affected by the Scheme are set out in **ES Chapter 17 [APP-069]**, Section 17.7. Of the agricultural land within the Solar PV Sites, approximately 477.4 hectares (around 67%) is classified as Subgrade 3b or Grade 4 and is therefore not BMV land. There is no Grade 1 land, around 30.8 hectares (approximately 4%) of Grade 2 land, and approximately 209.3 hectares (around 29%) of Subgrade 3a land. The distribution of ALC grades is shown in **ES Volume 2, Figure 17-2: Agricultural Land Classification Mapping [APP-172]**. The Applicant has had regard to agricultural land quality in the design and site selection process and has sought, where practicable, to locate infrastructure on lower quality land. The Scheme will result in a temporary but long-term and reversible loss of agricultural land for the operational life of the Scheme. As set out in **ES Chapter 17 [APP-069]**, Section 17.10, this gives rise to a temporary, long-term moderate adverse effect on agricultural land overall, and a temporary, long-term major/moderate adverse effect on BMV land, both of which are assessed as significant. These effects are fully reported in the ES and are a matter for the Secretary of State to weigh in the planning balance against the need for the Scheme and its wider benefits. There are no significant permanent effects on agricultural land, as all land will be returned to its original use and condition as far as practicable following decommissioning.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			The Applicant notes that the approach to assessing the quality of the agricultural land is under further discussion with Natural England and is set out in the relevant **Statement of Common Ground** to be submitted at Deadline 1. Measures to avoid and minimise effects on soils and agricultural land are embedded within the Scheme design and secured through the DCO. These include the preparation and implementation of a **Soil Resources Management Plan (SRMP) [APP-280]**, which will control soil handling, storage and reinstatement during construction, operation and decommissioning, and a requirement to prepare and implement a Decommissioning Strategy in accordance with the **Outline Decommissioning Strategy [APP-279]**. Through the establishment and maintenance of long-term grassland beneath and between the solar arrays, soil health, quality and structure are anticipated to improve over the lifetime of the Scheme, resulting in a temporary, moderate beneficial effect on soil resources at decommissioning, which is assessed as significant (**ES Chapter 17 [APP-069]**, Sections 17.10 and 17.12).
KRB-002	Landscape and Visual Cultural Heritage	This proposal is situated in part of the very important " *Cotswolds Landscape* " and adjacent to the ancient " *Fosse Way* " Roman Road.	The Cotswolds National Landscape (CNL) is fully assessed as a standalone receptor within **ES Volume 3, Appendix 8.6: Assessment of Effects on the Special Qualities of the Cotswolds National Landscape [APP-197]**. This assessment considers the effects of the Scheme on landscape character, visual amenity and the special qualities of the CNL. The assessment found that there would be some short term impact to landscape character within the setting of the CNL but due to the avoidance measures embedded within the Scheme, harm to the CNL itself would be minimal with beneficial effects in the long term which would further the purposes of the designation. In respect of visual amenity, some short-term adverse effects would be experienced by a small number of

Reference	Theme	Comments/Issues Raised	Applicant's Response
			visual receptors with views to and from the CNL. However, these would reduce over time as a result of the proposed mitigation. The assessment of effects on the special qualities of the CNL scoped out 3 SQs as there is no association with the Site. The assessment found that there are no direct effects on the remaining SQs. There are some Minor/ Negligible short-term effects on a small number of visual receptors within the setting of the CNL which effect SQ7 -Tranquillity and SQ13 Archaeology and historic associations. However, these effects are mitigated by Year 15 when proposed vegetation has matured. The assessment also found that there would be beneficial effects on SQ 6 – Biodiversity and nature recovery as a result of the delivery of approximately 119.7 hectares of flower-rich neutral grassland (as defined in the BNG assessment) and SQ 12 - An accessible landscape as a result of the delivery of approximately 12.8km of new permissive paths within the setting of the CNL. The remaining SQs would remain entirely intact. The Scheme was refined through an iterative design process to avoid and reduce effects on the CNL and its setting. Panels along the edge of the CNL were removed from the Order Limits in fields C2, C3 and C4 where significant visual effects on receptors within the CNL were identified. Panels were also removed from fields C1, C6, C8, the western section of C9 and the majority of C10, with this land now proposed for ecological mitigation to protect the setting of the CNL. In addition, panels within fields A11 and A12 were removed and the land repurposed for ecological mitigation to protect the setting of the CNL towards Sherston. All land parcels adjacent to the CNL are proposed to deliver habitat enhancement, informed by the CNL Management Plan and the Cotswolds National Landscape Strategy and Guidelines, to further the purposes of the designation.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Details of the proposed landscape and ecological mitigation and enhancement measures are provided in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**, Figure 3-4-1 to 3-4-5.2, **Landscape and Ecology Mitigation Plan [APP-084]** and the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]**, and the **Outline Ecological Protection and Mitigation Strategy (EPMS) [APP-284]**. The preparation, approval and implementation of the detailed Landscape and Ecological Management Plan, substantially in accordance with the **OLEMP [APP-283]**, are secured through Requirement 7 in Schedule 2 of the **Draft Development Consent Order [APP-016]**. The preparation, approval and implementation of the detailed Ecological Protection and Mitigation Strategy, substantially in accordance with the **EPMS [APP-284]**, are secured through Requirement 8 in Schedule 2 of the **Draft Development Consent Order [APP-016]**. These requirements ensure that the identified mitigation and enhancement measures are delivered and maintained throughout the lifetime of the Scheme. The potential effects of the Scheme on the cultural heritage of the Fosse Way and associated Roman archaeological assets are fully assessed in **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, supported by detailed technical appendices in **ES Volume 3, Appendices 12-1 to 12-7 [APP-219 to APP-231]**. The assessment identifies known Roman heritage assets, considers their significance, and evaluates likely effects during construction, operation and decommissioning, including effects on setting. **Appendix 12.1: Heritage Statement [APP-219]** identified that the overall setting and significance of the Fosse Way will remain intact, and the asset will retain its legibility as a roadway within a largely agrarian landscape. Consequently, no significant effects were identified to the asset.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Since the design presented at PEIR stage, Field C26, the westernmost part of Field C25, and the majority of Field C13 have been entirely removed from the Order Limits. Solar PV Panels have also been removed entirely from within Fields B1-B5, C24-C25, and C13. A number of fields abutting the Fosse Way within which Solar PV Panels will be erected have had offsets established with their boundaries with Fosse Way, including Fields B6, C10-C12, and C22-C23. **Appendix 12.1: Heritage Statement [APP-219]** identified that the overall setting and significance of the Fosse Way will remain intact, and the asset will retain its legibility as a roadway within a largely agrarian landscape. Consequently, no significant effects were identified to the asset. Embedded mitigation measures to avoid or reduce harm to heritage assets are set out in Section 12.9 of **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, with additional mitigation detailed in Section 12.11. An overarching archaeological mitigation strategy is provided in **ES Volume 3, Appendix 12-6: Outline Archaeological Mitigation Strategy [APP-230]**.
KRB-003	Climate Change and Energy Need Landscape and Visual Human Health	This flawed scheme is based around Old Technology , manufactured overseas, and rather than being GREEN it is , in fact, completely the opposite when you consider the potential scarring of the landscape during its construction let alone the effect on the local communities and the lives of the people who live in this area.	Solar PV is a well-established and widely deployed form of renewable electricity generation that is capable of delivering reliable, large-scale low-carbon power over the lifetime of the Scheme. While technological efficiencies are expected to continue to improve over time, this does not reduce the effectiveness of solar PV as a means of reducing greenhouse gas emissions either now or in the future. The Scheme has been designed to allow for the replacement and upgrading of components during its operational life, enabling the use of more efficient technology as it becomes available, within the parameters assessed. This approach ensures that the Scheme remains effective and adaptable while continuing to deliver meaningful carbon savings.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			ES Volume 1, Chapter 7: Climate Change [APP-059] assesses greenhouse gas (GHG) emissions across the full life cycle of the Scheme, including the manufacture, transport, installation, operation, maintenance and decommissioning of Scheme components. This assessment includes embodied carbon associated with materials and components, as well as operational emissions savings arising from renewable electricity generation. The assessment concludes that, while emissions are associated with the manufacture and construction of the Scheme, these are outweighed over time by the carbon savings achieved through the displacement of fossil fuel-derived electricity generation. When considered over its operational lifetime, the Scheme would result in a net reduction in GHG emissions compared to a 'without Scheme' scenario and would make a meaningful contribution to the UK's legally binding carbon budgets and transition to net zero. <u>Landscape and Visual</u> An assessment of landscape and visual effects are presented in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**. The Landscape and Visual Impact Assessment (LVIA) assesses effects on identified landscape and visual receptors, including residential properties, users of public rights of way and roads, and identifies where significant effects may occur. The LVIA found no significant long term visual effects to residential properties as a consequence of the Scheme. The visual effects of the Scheme are summarised in **ES Volume 3, Appendix 8-3-3 [APP-192]**. Temporary Major/Moderate and

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Moderate Adverse effects on visual receptors have been recorded across the Scheme during construction and at Year 1. However, for the majority of these receptors, the effects reduce to non –significant levels as a result of the embedded mitigation measures which are set out in Section 8.9 of **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]** and include landscape buffers, retention of existing hedgerows and woodland, and new planting to provide screening and integration over time. The assessment also identifies that there would be some long-term significant effects on the visual amenity of users of some localised footpaths, as a result of the Scheme. This predominantly relates to locations where footpaths diagonally cross fields and mitigation planting would be inappropriate to landscape character and the legacy landscape. Those receptors which would experience Significant Long Term Visual Effects are listed in Table 8-30 of the **LVIA [APP-060].** The scale of development within the Order Limits has been significantly reduced from the layout assessed in the Preliminary Environmental Information Report (PEIR) through an iterative design process undertaken in response to consultation and in accordance with the mitigation hierarchy to avoid, reduce and mitigate adverse effects. As part of this design evolution, panels along the edge of the Cotswolds National Landscape and along the Fosse Way have been removed. Mitigation measures to address landscape and visual effects are set out in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**, **Figure 3-4-1 to 3-4-5.2 Landscape and Ecology Mitigation Plan [APP-084]** and secured within the **Outline Landscape and Ecological Mitigation Plan (LEMP) [APP-283]** and the **Outline Ecological Protection and Mitigation Strategy (EPMS) [APP-284]**. These documents

Reference	Theme	Comments/Issues Raised	Applicant's Response
			include proposals for new and enhanced planting, retention of existing hedgerows and woodland, and landscape integration measures to reduce visual effects over time. In addition, the Scheme design incorporates minimum offsets from existing landscape features, including residential properties, ancient woodland, woodland, hedgerows, public rights of way and watercourses, to further limit visual impacts. Although these measures reduce the effects of the Scheme on nearly all receptors, as noted above there are 10 receptors which would experience Significant Visual Effects for the duration of the Scheme as set out Table 8-30 of the **LVIA [APP-060]**. Mitigation measures to address landscape and visual effects are set out in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**, **Figure 3-4-1 to 3-4-5.2 Landscape and Ecology Mitigation Plan [APP-084]**. The preparation, approval and implementation of detailed landscape and ecological management plans, substantially in accordance with the **OLEMP [APP-283]** and **EPMS [APP-284]**, are secured through requirements in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that the identified mitigation measures are delivered and maintained throughout the lifetime of the Scheme. <u>Human Health</u> Impacts on physical health and wellbeing are assessed in **ES Volume 1, Chapter 18: Human Health [APP-070].** This chapter provides a comprehensive assessment of the Scheme's potential effects on human health, including physical health and wellbeing, through consideration of a broad range of health determinants with physical health pathways. These include access to housing, access to open space and recreation, transport and connectivity,

Reference	Theme	Comments/Issues Raised	Applicant's Response
			climate change, air quality, water quality, land quality, noise and vibration, and access to health and social care services. The assessment in **ES Volume 1, Chapter 18: Human Health [APP-070]** applies a health-based review of relevant technical chapters to identify potential pathways by which the Scheme could affect physical health. It concludes that, with the embedded mitigation and additional measures secured through the relevant management plans **[APP-277** to **APP-287]** secured by their respective requirements in Schedule 2 to the **Draft DCO [APP-016]**, the Scheme would not give rise to significant adverse effects on population physical health at any phase of the Scheme. Mitigation measures include (but are not limited to) ensuring PROWs remain open as much as is practicable, inbound workers are accommodated in the most suitable locations for housing and health service access, community liaison and engagement is maintained, and construction impacts on waterways, soils, noise and air quality are regulated. Priority has been given in the assessment to communities most likely to experience potential health-related effects, within the 2 km Study Area surrounding the Scheme. The Applicant notes that the assessment methodology for health and wellbeing has been agreed with Wiltshire Council's Public Health team and is set out in the relevant Statement of Common Ground to be submitted at Deadline 1**.**
KRB-004	Landscape and Visual	I am extremely concerned that in the future years, when this technology and site becomes redundant , that rather than reverting to its original state it will instead be classed as a BROWNFIELD SITE and therefore not regulated as	The effects of decommissioning on soils and agricultural land are assessed in **ES Volume 1, Chapter 17 Soils and Agriculture [APP-069]**. As stated in this chapter, all land will be returned to its original use and condition as far as practicable and returned to the landowner. The effect on agricultural land quality at decommissioning would be influenced by the extent of

Reference	Theme	Comments/Issues Raised	Applicant's Response
		countryside anymore. Our future generations will inherit possible urban sprawl and industrialisation of our Beautiful Countryside.	disturbance caused by the removal of the Solar PV Panels, for example the presence and dimensions of leftover voids or the depth of the remaining underground cables. Currently, the most environmentally acceptable option is to leave the cables in-situ, although the cables could be removed by excavating at regular intervals and pulling the cable through to the extraction point, thus avoiding the need to excavate the entire cable trench. In either case, the effects would be less than those likely to occur during the construction phase. Built aspects of the Scheme such as the BESS Area and substations are also subject to the proposal to return the land to its original use and condition, which is primarily agricultural land of Subgrade 3b quality, with some Subgrade 3a at the BESS Area. Measures to manage decommissioning and reinstatement are set out in the **Outline Decommissioning Strategy [APP-279]**, which has been submitted as part of the DCO Application. The Decommissioning Strategy will include robust methodologies and control points to avoid contamination of the underlying land with physical or chemical contaminants and will be applied in conjunction with the Soil Resources Management Plan (SRMP) in order to promote successful reinstatement. A detailed Decommissioning Strategy will be prepared substantially in accordance with the **Outline Decommissioning Strategy [APP-279]** and must be submitted to and approved by the relevant local planning authority prior to the commencement of decommissioning. This is secured through Requirement 20 in Schedule 2 of the **Draft Development Consent Order [APP-016]**. In addition, the Applicant is seeking a time-limited consent for the Scheme to have an operational period of 60 years, with decommissioning to take place following cessation of operation. This is secured by Requirement 20 in Schedule 2 of the **Draft DCO [APP-016]**.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			The Applicant confirms that none of the land will be considered brownfield after decommissioning. The expectation is that the land will return to farming, but the Applicant cannot dictate what will happen to the land post-decommissioning when the Applicant no longer has an interest in the land.

6.38 Simon Gaskell

Table 6-38 RR-4377

Reference	Theme	Comments/Issues Raised	Applicant's Response
SG-001	Noise and Vibration Landscape and Visual Cultural Heritage Human Health	The noise is disruptive and in this case the area is wrong in many ways as previously covered by many locals and tourists alike who see a Roman road and British countryside which will be altered for a great deal of time.	Noise and Vibration An assessment of the effects of the Scheme on noise and vibration is provided in **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**, with supporting technical information supplied in **ES Volume 3, Appendix 14-4: Noise Modelling [APP-237]**. The assessment considers potential noise and vibration impacts during construction, operation and decommissioning, including from solar PV panels and associated infrastructure. The Applicant notes that the approach to noise and vibration has been discussed with Wiltshire Council, as described in Section 14.2 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**. Construction phase The noise and vibration impacts arising from construction activities are assessed in Section 14.10 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**. For the purposes of the assessment, a reasonable worst-case scenario assuming piling activities has been considered. Mitigation measures associated with construction activity are presented in Section 14.9 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]** and are committed to through the **Outline Construction Environmental Management Plan [APP-277]**. A noise monitoring programme agreed with Wiltshire Council will be carried out during construction. The preparation, approval and implementation of the Construction Environmental Management Plan, substantially in accordance with the **Outline CEMP [APP-277]**, is secured through Requirement 13 in Schedule 2 of the **Draft**

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Development Consent Order [APP-016], ensuring that construction noise and vibration are appropriately controlled. With these measures in place, the assessment concludes that no significant effects from construction noise or vibration are expected. <u>Operational phase</u> The noise impacts from the operation of the Scheme and its components are assessed in Section 14.10 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**, with supporting modelling provided in **ES Volume 3, Appendix 14-4: Noise Modelling [APP-237]**. A penalty has been applied to predicted noise levels from the Solar PV Sites to account for the distinctive nature of the sound. Potential mitigation measures are detailed in Section 14.9 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**, and with such measures in place, significant effects from operational noise are not expected. The **Outline Operational Environmental Management Plan (Outline OEMP) [APP-278]** commits to noise levels from the Scheme at residential dwellings being the same as or below those modelled in the ES. This provides assurance that significant effects from operational noise will be avoided, while allowing flexibility in how this is achieved. The preparation, approval and implementation of the detailed OEMP, substantially in accordance with the outline plan, are secured through Requirement 14 of Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring operational noise is appropriately controlled throughout the lifetime of the Scheme.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Landscape and Visual and the Fosse Way The landscape and visual effects of the Scheme, including effects on the Fosse Way and its setting, are assessed in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**. The Landscape and Visual Impact Assessment (LVIA) identifies users of the Fosse Way as visual receptors and evaluates likely effects during construction, operation and decommissioning using realistic worst-case design parameters. The Scheme design has been refined through an iterative design process to avoid and reduce visual effects on the Fosse Way. This includes the removal of solar panels from fields adjacent to the Fosse Way where significant visual effects were identified, together with the introduction of landscape buffers and new planting to further reduce visibility of infrastructure from the road and its surrounding landscape. The potential effects of the Scheme on the cultural heritage of the Fosse Way and associated Roman archaeological assets are fully assessed in **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, supported by detailed technical appendices in **ES Volume 3, Appendices 12-1 to 12-7 [APP-219 to APP-231]**. **Appendix 12.1: Heritage Statement [APP-219]** identified that the overall setting and significance of the Fosse Way will remain intact, and the asset will retain its legibility as a roadway within a largely agrarian landscape. Consequently, no significant effects were identified to the asset. The Applicant notes that the approach to the assessment in relation to the Fosse Way has been agreed with Historic England and the methodology for the mitigation strategy is being discussed with Historic England and is set out in the relevant **Statement of Common Ground** to be submitted at Deadline 1.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Details of the proposed landscape mitigation measures are set out in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**, Figure 3-4-1 to 3-4-5.2 **Landscape and Ecology Mitigation Plan [APP-084]** and the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]**, and the **Outline Ecological Protection and Mitigation Strategy (OEPMS) [APP-284]**. The preparation, approval and implementation of detailed landscape and ecological management plans, substantially in accordance with the **OLEMP [APP-283]**, are secured through Requirement 7 in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that visual mitigation measures are delivered and maintained throughout the lifetime of the Scheme. In addition, effects on the setting of the Fosse Way as a heritage asset are assessed in **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, which concludes that, with the design refinements and secured mitigation in place, effects on the setting of the Fosse Way are appropriately managed. Since the design presented at PEIR stage, Field C26, the westernmost part of Field C25, and the majority of Field C13 have been entirely removed from the Order Limits. Solar PV Panels have also been removed entirely from within Fields B1-B5, C24-C25, and C13. A number of fields abutting the Fosse Way within which Solar PV Panels will be erected have had offsets established with their boundaries with Fosse Way, including Fields B6, C10-C12, and C22-C23. **Appendix 12.1: Heritage Statement [APP-219]** identified that the overall setting and significance of the Fosse Way will remain intact, and the asset will retain its legibility as a roadway within a largely agrarian

Reference	Theme	Comments/Issues Raised	Applicant's Response
			landscape. Consequently, no significant effects were identified to the asset. Public Rights of Way and Recreational Access A detailed assessment of the likely significance of effects from the Scheme on the use and desirability of individual PRoW and recreational access to the countryside is included in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** and **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]**. This assessment considers the impact on individual recreational routes, including their practical use, enjoyment and desirability. The Applicant confirms that the majority of significant adverse effects can be mitigated. However, some significant adverse effects to users of PRoW and unsurfaced roads in Lime Down E during construction cannot be mitigated further. No significant residual effects are anticipated during the operational phase of the Scheme. The assessment in **ES Volume 1, Chapter 18: Human Health [APP-070]** also considers the physical and mental health impacts of changes to recreation and countryside access under the assessment topic 'open space, leisure and play', and concludes that no significant adverse effects are anticipated at any phase of the Scheme. The Applicant confirms that existing PRoW are to be protected as far as practicable within the Scheme design, with management measures set out in the **Outline Public Rights of Way and Permissive Paths Management Plan (oPROWPPMP) [APP-282]**, confirmed as embedded mitigation in Section 16.9 of ES Chapter 16. New permissive access routes have been incorporated into the Scheme design, shown as Work No. 10 on the **Works Plan**

Reference	Theme	Comments/Issues Raised	Applicant's Response
			[APP-007] and illustrated on **ES Volume 2, Figure 3-4: Landscape and Ecology Mitigation Plan [APP-084]**. These are identified as additional mitigation and enhancement measures in Section 16.11 of ES Chapter 16. The **oPROWPPMP [APP-282]** is secured through Requirement 16 of Schedule 2 of the **Draft Development Consent Order [APP-016]**. The preparation, approval and implementation of the detailed Construction Environmental Management Plan and Construction Traffic Management Plan, substantially in accordance with the outline plans, are secured through Requirements 13 and 15 respectively in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that impacts on PRoW and recreational routes are appropriately managed during construction. The approach to recreation and access has been discussed with Wiltshire Council's Public Health team and is under discussion with Wiltshire Council's Countryside Access Team and is set out in the relevant Statement of Common Ground to be submitted at Deadline 1. <u>Human Health</u> The assessment in **ES Volume 1, Chapter 18: Human Health [APP-070]** goes on to assess the physical and mental health impacts of changes to recreation and countryside access under the assessment topic 'open space, leisure and play', finding that no significant adverse effects are anticipated at any phase of the Scheme. The Applicant notes that the approach to recreation and access to the countryside has been agreed with Wiltshire Council's Public Health team and is being discussed with Wiltshire Council's Countryside Access Team. This is set out in the

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Statement of Common Ground with Wiltshire Council to be submitted at Deadline 1.
SG-002	Soils and Agriculture	This project should be done in brown areas in sensitive positions, smaller areas no doubt, factory roof tops not virgin countryside.	An assessment of the potential effects of the Scheme on soils and agricultural land is provided in **ES Volume 1, Chapter 17 Soils and Agriculture [APP-069]**. This chapter considers baseline agricultural land quality, including Best and Most Versatile (BMV) land, and assesses likely significant effects arising from construction, operation and decommissioning of the Scheme, together with embedded mitigation measures. The areas of each Agricultural Land Classification (ALC) grade affected by the Scheme are set out in Section 17.10 of **ES Volume 1, Chapter 17: Soils and Agriculture [APP-069]**. Of the agricultural land within the Solar PV Sites, approximately 477.4 hectares (around 67%) is classified as Subgrade 3b or Grade 4 and is therefore not BMV land. There is no Grade 1 land, around 30.8 hectares (approximately 4%) of Grade 2 land, and approximately 209.3 hectares (around 29%) of Subgrade 3a land. The distribution of ALC grades is shown in **ES Volume 2, Figure 17-2: Agricultural Land Classification Mapping [APP-172]**. The Applicant has had regard to agricultural land quality in the design and site selection process and has sought, where practicable, to locate infrastructure on lower quality land. The Scheme will result in a temporary but long-term and reversible loss of agricultural land for the operational life of the Scheme. As set out in **ES Chapter 17 [APP-069]**, Section 17.10, this gives rise to a temporary, long-term moderate adverse effect on agricultural land overall, and a temporary, long-term major/moderate adverse effect on BMV land, both of which are assessed as significant. These effects are fully reported in the ES and are a matter for the Secretary of State to weigh in the planning balance against the need for the Scheme and its wider benefits. There are no significant permanent effects on agricultural land, as all land will be returned to its original use and

Reference	Theme	Comments/Issues Raised	Applicant's Response
			condition as far as practicable following decommissioning. The Applicant notes that the approach to assessing the quality of the agricultural land is being discussed with Natural England and is set out in the relevant **Statement of Common Ground** to be submitted at Deadline 1. Measures to avoid and minimise effects on soils and agricultural land are embedded within the Scheme design and secured through the DCO. These include the preparation and implementation of a **Soil Resources Management Plan (SRMP) [APP-280]**, which will control soil handling, storage and reinstatement during construction, operation and decommissioning, and a requirement to prepare and implement a Decommissioning Strategy in accordance with the **Outline Decommissioning Strategy [APP-279]**. Through the establishment and maintenance of long-term grassland beneath and between the solar arrays, soil health, quality and structure are anticipated to improve over the lifetime of the Scheme, resulting in a temporary, moderate beneficial effect on soil resources at decommissioning, which is assessed as significant (Section 17.10 and 17.12 of **ES Volume 1, Chapter 17: Soils and Agriculture [APP-069]**). In relation to suggestions that brownfield land or alternative locations should be used, including rooftop, these matters are addressed in **ES Volume 1, Chapter 4 Alternatives and Design Evolution** and in the **Statement of Need [APP-056 and APP-266]**. The Applicant has considered alternatives, including previously developed land and other forms of solar deployment, as part of the site selection and design evolution process. As shown in Table 2-2 of **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]**, the Applicant has considered previously developed land/brownfield land over 1

Reference	Theme	Comments/Issues Raised	Applicant's Response
			hectare within the area of search, based on the brownfield land registers of the relevant Local Planning Authorities, and concluded that none of the sites are large enough to provide a viable land parcel of at least 40 ha and sites were not considered to be available as they have planning permission for residential development and/or are allocated for residential/mixed use development. National policy and government guidance, as set out in the **Statement of Need [APP-266]**, recognise that while rooftop and smaller-scale solar installations are an important part of the energy mix, they cannot alone meet the scale of capacity required to achieve clean power and net zero objectives. Large-scale ground-mounted solar therefore remains necessary in addition to, not instead of, rooftop solar.
SG-003	Socio-Economics, Tourism and Recreation	This will seriously impact the area life of many locals, tourism	Impacts on physical health and wellbeing are assessed in **ES Volume 1, Chapter 18: Human Health [APP-070].** This chapter provides a comprehensive assessment of the Scheme's potential effects on human health, including physical health and wellbeing, through consideration of a broad range of health determinants with physical health pathways. These include access to housing, access to open space and recreation, transport and connectivity, climate change, air quality, water quality, land quality, noise and vibration, and access to health and social care services. The assessment in **ES Volume 1, Chapter 18: Human Health [APP-070]** applies a health-based review of relevant technical chapters to identify potential pathways by which the Scheme could affect physical health. It concludes that, with the embedded mitigation and additional measures secured through the relevant management plans **[APP-277** to **APP-287]** secured by their respective requirements in Schedule 2 to the **Draft DCO [APP-016]**, the Scheme would not give rise to significant adverse effects on population physical health at any phase of the Scheme.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Mitigation measures include (but are not limited to) ensuring PROWs remain open as much as is practicable, inbound workers are accommodated in the most suitable locations for housing and health service access, community liaison and engagement is maintained, and construction impacts on waterways, soils, noise and air quality are regulated. Priority has been given in the assessment to communities most likely to experience potential health-related effects, within the 2 km Study Area surrounding the Scheme. The Applicant notes that the assessment methodology for health and wellbeing has been agreed with Wiltshire Council's Public Health team and is set out in the relevant Statement of Common Ground to be submitted at Deadline 1. The potential effects of the Scheme on tourism and recreation are assessed in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]**, supported by **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]**. The assessment considers baseline tourism activity, visitor attractions, recreational assets and tourism-dependent businesses within the study area. The assessment evaluates potential effects on the use, enjoyment and desirability of nearby tourism destinations, including impacts on individual visitor attractions, recreational routes, events and businesses reliant on tourism. It also considers whether changes to landscape character or visual amenity could influence visitor behaviour. The assessment identifies a worst-case scenario in which a temporary loss of up to 50 tourism-related jobs could occur locally during construction, and a long-term loss of up to 11 tourism-related jobs could occur during the operational phase of

Reference	Theme	Comments/Issues Raised	Applicant's Response
			the Scheme. This represents a precautionary estimate based on conservative assumptions. The assessment concludes that, while some localised effects on tourism receptors are anticipated to occur, significant adverse effects on the wider tourism economy are not anticipated. These findings are fully reported in the ES and will be weighed in the planning balance alongside the Scheme's wider economic and environmental benefits. The Applicant notes that the approach to assessment of tourism impacts is being discussed with Wiltshire Council's Economic and Regeneration Team and is set out in the relevant Statement of Common Ground to be submitted at Deadline 1.
SG-004	Landscape and Visual Ecology and Biodiversity	This project should not go ahead for many reasons and here are just a few. I have previous experience of a nearby solar farm and the replanting is something that does not live up to what they say with intermittent planting and dying trees not replanted. The area changes majorly.	The landscape and visual effects of the Scheme, including the effectiveness and phasing of proposed screening and planting, are assessed in the Landscape and Visual Impact Assessment (LVIA) presented in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**. The LVIA considers landscape and visual effects over time, including during the early years of the Scheme before planting is fully established, and identifies where significant effects may occur. NPS EN-1 recognises at para 5.10.5 that "*Virtually all nationally significant energy infrastructure projects will have adverse effects on the landscape, but there may also be beneficial landscape character impacts arising from mitigation*." Mitigation measures are detailed in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**, Figure 3-4-1 to 3-4-5.2 **Landscape and Ecology Mitigation Plan [APP-084]** and the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]**. Proposed planting comprises a mix of native species designed to enhance biodiversity and resilience, with planting design prioritising long-term effectiveness and landscape integration. The **OLEMP [APP-283]** sets out the

Reference	Theme	Comments/Issues Raised	Applicant's Response
			approach to establishment, maintenance and management of planting to ensure its effectiveness over the lifetime of the Scheme. The preparation, approval and implementation of the detailed Landscape and Ecological Management Plan, substantially in accordance with the **OLEMP [APP-283]**, are secured through Requirement 7 in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that mitigation planting and screening measures are delivered and maintained throughout the lifetime of the Scheme. Details of tree protection, replacement planting and long-term management are set out in the **Outline Landscape and Ecological Management Plan [APP-283]** and the **Outline Construction Environmental Management Plan [APP-277]**. The preparation, approval and implementation of detailed landscape and ecological management plans, substantially in accordance with the outline plans, are secured through requirements in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that arboricultural mitigation measures are delivered and maintained throughout the lifetime of the Scheme.

6.39 Sheralyn Blackett

Table 6-39 RR-4345

Reference	Theme	Comments/Issues Raised	Applicant's Response
SB-001	Ecology and Biodiversity Hydrology, Flood Risk and Drainage	I vehemently object to this submission and think that the development consent order should be refused. Below are a very few of the reasons why: As a tax payer I do not want any of my money paid as subsidies to the overseas developers who are proposing this monstrous industrialisation of our country side. It is not efficient or reliable or safe and the only reason it is proposed is because the developers will make alot of money from the uk subsidies that they will be paid at the huge detriment of numerous communities, wildlife and wildlife corridors as well as other immeasurable consequences such as increased flood risks through rain run off danger to health and safety through fire risk of the BESS (with no safe way of fires being extinguished leading to air pollution and contamination of the water table) and possibly damage of the solar panels by birds thinking they are water. If the panels are broken this also leads to contamination of the land.	The Applicant confirms that Lime Down Solar Park is being developed solely through private sector financing and that it has not received, and is not receiving any public money, subsidy or funding in the development of the Scheme. Wildlife Potential impacts on ecology and biodiversity are fully assessed in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**. This assessment considers baseline ecological conditions and evaluates likely significant effects arising during the construction, operation and decommissioning phases of the Scheme. It identifies avoidance, mitigation and enhancement measures to address potential impacts on habitats and protected and notable species. It also identifies opportunities for ecological enhancement, including the creation and long-term management of habitats, and delivery of biodiversity net gain. The assessment concludes that, with the identified embedded and additional mitigation measures in place, no unacceptable significant adverse effects on ecology and biodiversity are anticipated. The Applicant notes that the approach to the assessment in relation to ecology and biodiversity in general is being discussed with Wiltshire Council and Natural England and is set out in the relevant **Statements of Common Ground** to be submitted at Deadline 1. During construction, specific measures are proposed to avoid disturbance and displacement of wildlife. These include protective buffers around sensitive habitats and features, timing restrictions on vegetation clearance, pre-construction ecological surveys, species-specific mitigation, and pollution prevention controls which are set out in the **Outline Ecological Protection and Mitigation Strategy (EPMS) [APP-284]**. Measures to

Reference	Theme	Comments/Issues Raised	Applicant's Response
			protect trees and hedgerows are also set out in **ES Volume 1, Chapter 10 Arboriculture [APP-062]**. Potential effects of boundary treatments and fencing on ecology and wildlife movement are assessed in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**, which considers impacts on habitats and species during construction, operation and decommissioning and identifies measures to avoid or mitigate barriers to wildlife movement. The Scheme design incorporates fencing around the Solar PV Arrays that is permeable to wildlife, with the exception of deer. This means animals (excluding deer only) will be able to freely access habitats within the Solar PV Sites without the need for wildlife gates. In addition, wide buffers are retained around the peripheries of the Solar PV Sites to allow wildlife, including deer, to move between favoured habitats. These measures are described in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]** and detailed in the **Outline Ecological Protection and Mitigation Strategy (OEPMS) [APP-284]**. Fencing will be subject to regular inspection and maintenance to ensure continued permeability to wildlife and effective functioning over the lifetime of the Scheme. Measures for ongoing ecological management and maintenance are set out in the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]**. The preparation, approval and implementation of the detailed Ecological Protection and Mitigation Strategy and Landscape and Ecological Management Plan, substantially in accordance with the **OEPMS [APP-284]** and **OLEMP [APP-283]**, are secured through Requirements 8 and 7 respectively in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that fencing design and maintenance measures are delivered and maintained throughout the lifetime of the Scheme.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			The Scheme will also result in the cessation of intensive arable farming within the Solar PV Sites. As identified in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**, this is expected to reduce the ongoing application of herbicides and pesticides, supporting improvements in habitat quality over the operational lifetime of the Scheme. The reversion of existing arable land within the Solar PV Sites to predominantly grassland habitats can be expected to benefit a wide range protected and notable species, as identified in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061].** Mitigation and enhancement measures are detailed in the **OLEMP [APP-283]** and the **OEPMS [APP-284]**, which set out habitat creation, species protection measures, buffer zones and long-term ecological management. The preparation, approval and implementation of the detailed Landscape and Ecological Management Plan, substantially in accordance with the **OLEMP [APP-283]**, are secured through Requirement 7 in Schedule 2 of the **Draft Development Consent Order [APP-016]**. The preparation, approval and implementation of the detailed Ecological Protection and Mitigation Strategy, substantially in accordance with the **OEPMS [APP-284]**, are secured through Requirement 8 in Schedule 2 of the **Draft Development Consent Order [APP-016]**. These requirements ensure that ecological protection and enhancement measures are delivered and maintained throughout construction and operation of the Scheme. <u>Flood Risk</u> An assessment of the effects of the Scheme on flood risk both within the Site and the surrounding area is provided in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage**

Reference	Theme	Comments/Issues Raised	Applicant's Response
			[APP-063], with supporting information provided in **ES Volume 3, Appendix 11-1 to 11-9: Flood Risk Assessment and Drainage Strategy [APP-210 to APP-218].** The assessment concludes that, with the embedded mitigation measures secured, the Scheme would not result in a material increase in off-site flood risk, including to adjacent communities and downstream receptors, and that any on-site flood risk would be managed such that the Scheme remains safe and operable for its lifetime. The assessment has been prepared in accordance with national policy and best practice guidance and in consultation with the Environment Agency and Lead Local Flood Authority and is set out in the relevant **Statement of Common Ground** to be submitted at Deadline 1. The **Outline Construction Environmental Management Plan (Outline CEMP) [APP-277]** has been developed to control construction-phase risks and ensure there is no material increase in off-site flood risk. In accordance with NPS EN-3 (paragraph 2.10.84), the assessment differentiates between solar PV panel areas, which drain to the existing ground and therefore do not generally give rise to significant drainage effects, and associated infrastructure (for example access tracks, temporary construction compounds, substations and the BESS) where runoff controls are required. Where drainage measures are necessary, these include permeable surfacing, infiltration features, swales and attenuation storage to manage surface water and maintain greenfield runoff behaviour, as applicable. **Requirement 13 in Schedule 2 to the Draft DCO [APP-016]** secures that part of the authorised development can commence until, a CEMP is submitted to and approved by the relevant

Reference	Theme	Comments/Issues Raised	Applicant's Response
			planning authority. The CEMP must be substantially in accordance with the **Outline CEMP [APP-277]**, and all construction works associated must be carried out in accordance with the approved CEMP. Fire Risk The Battery Energy Storage System (BESS) containers proposed for the Scheme will incorporate built-in safety features for fire avoidance, detection and suppression. The Scheme layout also incorporates separation distances between battery containers to ensure that any isolated fire would not become widespread or lead to a major incident. As shown on **ES Volume 2, Figure 3-1: Indicative Site Layout Plan [APP-081]**, the battery containers will be located more than 200 metres from the nearest Public Right of Way and more than 500 metres from any residential receptors. The Applicant notes that the approach to BESS safety is being discussed with Dorset and Wiltshire Fire and Rescue Service (D&WFRS) and is set out in the relevant **Statement of Common Ground** to be submitted at Deadline 1. An **Outline Battery Safety Management Plan (OBSMP) [APP-286]** has been prepared for the Scheme using guidance from Dorset and Wiltshire Fire and Rescue Service and incorporating recommendations of the National Fire Chiefs Council. The **OBSMP [APP-286]** ensures that risks associated with battery storage are appropriately mitigated. Section 6.1.1 of the **OBSMP [APP-286]** confirms that at the detailed design stage, the selected BESS will have undertaken Large Scale Fire Testing (LSFT) to fully inform inputs for risk assessment tools which will be utilised together with detailed

Reference	Theme	Comments/Issues Raised	Applicant's Response
			consequence modelling to provide a comprehensive site operations and emergency response safety audit. LSFT is a mandatory requirement under NFPA 855 (2026) safety standards to demonstrate thermal insulation protection capabilities of the BESS enclosure design, validate minimum equipment spacing distances, and demonstrate that deflagrations do not occur and/or can be safely constrained. As set out in the **OBSMP [APP-286]** the BESS Area will have a robust and validated Emergency Response Plan (ERP), developed in consultation with Dorset & Wiltshire Fire and Rescue Service at the detailed design stage. Section 5.4 of the **OBSMP [APP-286]** specifies the typical emergency response protocols, procedures and safety information that will be included in the ERP. The ERP will apply to all stages of the Scheme, including construction, operation and decommissioning. Potential effects of toxic gases arising from a BESS fire are assessed in **ES Volume 1, Chapter 15: Air Quality [APP-067]** and in **ES Volume 1, Chapter 20: Other Environmental Matters [APP-072], Section 20.7: Major Accidents and Disasters.** An assessment of how these fumes could affect sensitive receptors within a 1 km radius of the BESS Area, including residential properties and ecological receptors, is provided in **ES Volume 1, Chapter 15: Air Quality [APP-067].** This assessment concludes that no significant off-site impacts are predicted should a fire event occur. In the unlikely event of a fire, the precautionary measures set out in the **OBSMP [APP-286]** — including advice to remain indoors and close windows — would further reduce potential impacts to residents. The **OBSMP [APP-286]** is secured through Requirement 6 (Battery safety management) in Schedule 2 of the **Draft DCO [APP-016]**, which provides that Work No. 2 must not

Reference	Theme	Comments/Issues Raised	Applicant's Response
			commence until a Battery Safety Management Plan has been submitted to and approved by the relevant planning authority. The approved plan must be substantially in accordance with the Outline Battery Safety Management Plan. The **Draft Development Consent Order [APP-016]** also requires the relevant planning authority to consult with Dorset and Wiltshire Fire and Rescue Service and the Environment Agency before determining the application, and that the Battery Safety Management Plan must be implemented as approved. <u>Birds</u> Potential impacts of the Scheme on birds, including breeding and wintering species within and around the Order Limits, are assessed in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**. The assessment considers baseline bird assemblages and evaluates likely effects during construction, operation and decommissioning, including habitat loss, disturbance and displacement. It concludes that, with embedded mitigation in place, no unacceptable significant adverse effects on bird populations are anticipated. The assessment also notes that there is very limited evidence that solar PV panels present a risk of bird collision or fatality. The Scheme design and mitigation measures are therefore focused on avoiding / mitigating habitat loss and disturbance, rather than collision risk. The Applicant notes that the approach to the assessment in relation to birds in general is being discussed with Wiltshire Council and is set out in the relevant **Statement of Common Ground** to be submitted at Deadline 1. Habitat creation and enhancement measures to support bird species are incorporated into the Scheme, including areas

Reference	Theme	Comments/Issues Raised	Applicant's Response
			provided for skylark mitigation and wider grassland and hedgerow enhancement. These measures are illustrated in **ES Volume 2, Figure 3-4: Landscape and Ecological Mitigation Plan [APP-084]** and detailed in the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]**. Measures to safeguard nesting and foraging birds during construction and operation, including timing of vegetation clearance, pre-construction checks and species-specific protection measures, are set out in the **Outline Ecological Protection and Mitigation Strategy (OEPMS) [APP-284]**. The preparation, approval and implementation of the detailed Landscape and Ecological Management Plan and Ecological Protection and Mitigation Strategy, substantially in accordance with the **OLEMP [APP-283]** and **EPMS [APP-284]**, are secured through Requirements 7 and 8 in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring bird protection and habitat enhancement measures are delivered and maintained throughout the lifetime of the Scheme. <u>Contamination</u> Potential effects of the Scheme on water quality and contamination risk are addressed in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [APP-063],** which sets out mitigation and management measures to protect water quality during construction and operation. These measures include pollution prevention controls, containment systems, emergency response protocols, and site-specific drainage measures, particularly around the Battery Energy Storage System (BESS) and substations where lined drainage and automatically actuating valves are proposed. The Applicant notes that the approach to pollution resulting from battery fire is being discussed with both the Environment

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Agency and the Lead Local Flood Authority (LLFA) and is set out in the relevant **Statement of Common Ground** to be submitted at Deadline 1. Mitigation measures to control contamination risk during construction are set out in the **Outline Construction Environmental Management Plan (Outline CEMP) [APP-277]**. Routine maintenance and panel cleaning will use minimal water and no detergents or chemical cleaning agents, in line with industry standards and best practice, so there is no expected risk from cleaning runoff. In addition, the removal of agrichemical inputs through the cessation of farming activities will further reduce contamination risks compared to existing use. The preparation, approval and implementation of a Construction Environmental Management Plan substantially in accordance with the **Outline CEMP [APP-277]** is secured through Requirement 13 in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that construction works are carried out in accordance with the approved CEMP and that contamination risks are appropriately managed throughout construction of the Scheme.
SB-002	Ecology and Biodiversity	Other consequences of this development if it were allowed would be: Blocking of wild life corridors would lead to increased accidents on roads with animals being forced to cross. Because the proposed development is long and narrow it would affect a far greater number of wildlife corridors than a square block of land.	Potential effects of boundary treatments and fencing on ecology and wildlife movement are assessed in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**, which considers impacts on habitats and species during construction, operation and decommissioning and identifies measures to avoid or mitigate barriers to wildlife movement. The Scheme design incorporates fencing around the Solar PV Arrays that is permeable to wildlife, with the exception of deer. This means animals (excluding deer only) will be able to freely access habitats within the Solar PV Sites without the need for

Reference	Theme	Comments/Issues Raised	Applicant's Response
			wildlife gates. In addition, wide buffers are retained around the peripheries of the Solar PV Sites to allow wildlife, including deer, to move between favoured habitats. These measures are described in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]** and detailed in the **Outline Ecological Protection and Mitigation Strategy (OEPMS) [APP-284]**.
SB-003	Landscape and Visual	The development should not be allowed to go ahead. The applicant admits that there would be significant visual harm for 15 years but I consider that it would be far longer with storm damage to newly planted trees and no shielding through winter	The landscape and visual effects of the Scheme, including the effectiveness and phasing of proposed screening and planting, are assessed in the Landscape and Visual Impact Assessment (LVIA) presented in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**. The LVIA considers landscape and visual effects over time, including during the early years of the Scheme before planting is fully established, and identifies where significant effects may occur. NPS EN-1 recognises at para 5.10.5 that "*Virtually all nationally significant energy infrastructure projects will have adverse effects on the landscape, but there may also be beneficial landscape character impacts arising from mitigation*." Mitigation measures are detailed in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**, Figure 3-4-1 to 3-4-5.2 **Landscape and Ecology Mitigation Plan [APP-084]** and the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]**. Proposed planting comprises a mix of native species designed to enhance biodiversity and resilience, with planting design prioritising long-term effectiveness and landscape integration. The **OLEMP [APP-283]** sets out the approach to establishment, maintenance and management of planting to ensure its effectiveness over the lifetime of the Scheme. The LVIA includes verified viewpoints with both summer and winter photography to demonstrate year-round changes to the landscape. Photomontages at Year 15 illustrate the

Reference	Theme	Comments/Issues Raised	Applicant's Response
			effectiveness of established planting, while also demonstrating the intended retention of openness across the receiving landscape. Hedgerows on the western edge of fields within Lime Down C, which border the Cotswolds National Landscape, are proposed to be maintained at approximately 1.5 metres (or as existing if greater) to retain open views within the setting of the Cotswolds National Landscape. This management approach is set out in the **OLEMP [APP-283]**. The preparation, approval and implementation of the detailed Landscape and Ecological Management Plan, substantially in accordance with the **OLEMP [APP-283]**, are secured through Requirement 7 in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that mitigation planting and screening measures are delivered and maintained throughout the lifetime of the Scheme.
SB-004	Site Selection	It is poor site selection that would destroy farmland forever. The idea that after 60 years the land would be bought back into agricultural production is naive and misleading. The land would be contaminated by rain run off from the solar panels. It would be an industrial wasteland. This is not a temporary development and should not be described as one.	An assessment of the potential effects of the Scheme on soils and agricultural land is provided in **ES Volume 1, Chapter 17 Soils and Agriculture [APP-069]**. This chapter considers baseline agricultural land quality, including Best and Most Versatile (BMV) land, and assesses likely significant effects arising from construction, operation and decommissioning of the Scheme, together with embedded mitigation measures. The areas of each Agricultural Land Classification (ALC) grade affected by the Scheme are set out in Section 17.7 of **ES Volume 1, Chapter 17: Soils and Agriculture [APP-069]**. Of the agricultural land within the Solar PV Sites, approximately 477.4 hectares (around 67%) is classified as Subgrade 3b or Grade 4 and is therefore not BMV land. There is no Grade 1 land, around 30.8 hectares (approximately 4%) of Grade 2 land, and approximately 209.3 hectares (around 29%) of Subgrade 3a land. The distribution of ALC grades is shown in **ES Volume 2, Figure 17-2: Agricultural Land Classification Mapping**

Reference	Theme	Comments/Issues Raised	Applicant's Response
			[APP-172]. The Applicant has had regard to agricultural land quality in the design and site selection process and has sought, where practicable, to locate infrastructure on lower quality land. The Scheme will result in a temporary but long-term and reversible loss of agricultural land for the operational life of the Scheme. As set out in **ES Volume 1, Chapter 17: Soils and Agriculture [APP-069]**, Section 17.10, this gives rise to a temporary, long-term moderate adverse effect on agricultural land overall, and a temporary, long-term major/moderate adverse effect on BMV land, both of which are assessed as significant. These effects are fully reported in the ES and are a matter for the Secretary of State to weigh in the planning balance against the need for the Scheme and its wider benefits. There are no significant permanent effects on agricultural land, as all land will be returned to its original use and condition as far as practicable following decommissioning. The Applicant notes that the approach to assessing the quality of the agricultural land is being discussed with Natural England and is set out in the relevant **Statement of Common Ground** to be submitted at Deadline 1. Measures to avoid and minimise effects on soils and agricultural land are embedded within the Scheme design and secured through Schedule 2, Requirement 17 of the **Draft DCO [APP-016]** which includes the preparation and implementation of a Soil Resources Management Plan (SRMP) in accordance with the **Outline SRMP [APP-280].** The SRMP will control soil handling, storage and reinstatement during construction, operation and decommissioning, and a requirement to prepare and implement a Decommissioning Strategy in accordance with the **Outline Decommissioning Strategy [APP-279],** which is secured by Schedule 2, Requirement 20 of the **Draft DCO [APP-016]**.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Through the establishment and maintenance of long-term grassland beneath and between the solar arrays, soil health, quality and structure are anticipated to improve over the lifetime of the Scheme, resulting in a temporary, moderate beneficial effect on soil resources at decommissioning, which is assessed as significant (Sections 17.10 and 17.12 of **ES Volume 1, Chapter 17: Soils and Agriculture [APP-069]**, Sections 17.10 and 17.12). Potential effects of the Scheme on water quality and contamination risk are addressed in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [APP-063]**, which sets out mitigation and management measures to protect water quality during construction and operation. These measures include pollution prevention controls, containment systems, emergency response protocols, and site-specific drainage measures, particularly around the Battery Energy Storage System (BESS) and substations where lined drainage and automatically actuating valves are proposed. Mitigation measures to control contamination risk during construction are set out in the **Outline Construction Environmental Management Plan [APP-277]**. Routine maintenance and panel cleaning will use minimal water and no detergents or chemical cleaning agents, in line with industry standards and best practice, so there is no expected risk from cleaning runoff. In addition, the removal of agrichemical inputs through the cessation of farming activities will further reduce contamination risks compared to existing use. The preparation, approval and implementation of a Construction Environmental Management Plan substantially in accordance with the **Outline Construction Environmental Management Plan [APP-277]** is secured through Requirement 13 in

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that construction works are carried out in accordance with the approved CEMP and that contamination risks are appropriately managed throughout construction of the Scheme.
SB-005	Other Environmental Matters Noise and Vibration	Noise pollution from the trackers on the solar panels and the BESS Light pollution from the security lights	The noise impacts from the operation of the Scheme and its components are assessed in Section 14.10 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**, with supporting modelling provided in **ES Volume 3, Appendix 14-4: Noise Modelling [APP-237]**. A penalty has been applied to predicted noise levels from the Solar PV Sites to account for the distinctive nature of the sound. Potential mitigation measures are detailed in Section 14.9 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**, and with such measures in place, significant effects from operational noise are not expected. The Applicant notes that the approach to noise from BESS has been discussed with Wiltshire Council, as described in Section 14.2 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**. The **Outline Operational Environmental Management Plan [APP-278]** commits to noise levels from the Scheme at residential dwellings being the same as or below those modelled in the ES. This provides assurance that significant effects from operational noise will be avoided, while allowing flexibility in how this is achieved. The preparation, approval and implementation of the detailed OEMP, substantially in accordance with the outline plan, are secured through Requirement 14 of Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring operational noise is appropriately controlled throughout the lifetime of the

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Scheme. Potential effects relating to lighting are assessed in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**, which considers the implications of construction, operational and decommissioning lighting on landscape and visual receptors. The Landscape and Visual Impact Assessment (LVIA) has considered the construction, operational and decommissioning lighting proposals for the Scheme, with details of lighting design, directionality and intermittent lighting set out in **ES Volume 1, Chapter 3: The Scheme [APP-055]** and further discussed in **ES Volume 1, Chapter 20: Other Environmental Matters [APP-072].** The Scheme has been designed to minimise the need for external lighting. Lighting is not required within the Solar PV Arrays during the operational phase. Motion-sensing security lighting will be provided within substations and the BESS Area and will be used only for maintenance and security purposes. Temporary site lighting during construction and decommissioning will be required to enable safe working during hours of darkness. This lighting will be designed, as far as reasonably practicable, to minimise light spill outside the Site and Cable Route Corridor, particularly towards residential properties, highways and ecological receptors. Standard good practice measures will be employed to minimise glare and light spill during construction, operation and decommissioning. There will be no lighting on perimeter fencing. Measures to control construction lighting are set out in the **Outline Construction Environmental Management Plan [APP-277]**, and operational lighting controls form part of the **Outline Operational Environmental Management Plan [APP-**

Reference	Theme	Comments/Issues Raised	Applicant's Response
			278]. The preparation, approval and implementation of detailed management plans, substantially in accordance with these outline plans, are secured through requirements in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring lighting impacts are appropriately controlled throughout the lifetime of the Scheme
SB-006	Landscape and Visual	Visual pollution with 4.5m high tracker panels and BESS stations	An assessment of landscape and visual effects are presented in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060],** including the BESS. The Landscape and Visual Impact Assessment (LVIA) assesses effects on identified landscape and visual receptors, including residential properties, users of public rights of way and roads, and identifies where significant effects may occur. The LVIA found no significant long term visual effects to residential properties as a consequence of the Scheme. The BESS has been assessed as part of the worst-case parameters for above-ground infrastructure, including through Zone of Theoretical Visibility analysis and representative viewpoints agreed through consultation with Wiltshire Council and the Cotswolds National Landscape Board. Photomontages **[APP103 – 105]** have been prepared where significant effects were anticipated to assist in understanding how the BESS and other infrastructure would appear in the landscape. The visual effects of the Scheme are summarised in **ES Volume 3, Appendix 8-3-3 [APP-192]**. Temporary Major/Moderate and Moderate Adverse effects on visual receptors have been recorded across the Scheme during construction and at Year 1. However, for the majority of these

Reference	Theme	Comments/Issues Raised	Applicant's Response
			receptors, the effects reduce to non –significant levels as a result of the embedded mitigation measures which are set out in Section 8.9 of **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]** and include landscape buffers, retention of existing hedgerows and woodland, and new planting to provide screening and integration over time. The assessment also identifies that there would be some long-term significant effects on the visual amenity of users of some localised footpaths, as a result of the Scheme. This predominantly relates to locations where footpaths diagonally cross fields and mitigation planting would be inappropriate to landscape character and the legacy landscape. Those receptors which would experience Significant Long Term Visual Effects are listed in Table 8-30 of the **LVIA [APP-060].** The scale of development within the Order Limits has been significantly reduced from the layout assessed in the Preliminary Environmental Information Report (PEIR) through an iterative design process undertaken in response to consultation and in accordance with the mitigation hierarchy to avoid, reduce and mitigate adverse effects. As part of this design evolution, panels along the edge of the Cotswolds National Landscape and along the Fosse Way have been removed. Mitigation measures to address landscape and visual effects are set out in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**, **Figure 3-4-1 to 3-4-5.2 Landscape and Ecology Mitigation Plan [APP-084]** and secured within the **Outline Landscape and Ecological Mitigation Plan (LEMP) [APP-283]** and the **Outline Ecological Protection and Mitigation Strategy (EPMS) [APP-284]**. These documents

Reference	Theme	Comments/Issues Raised	Applicant's Response
			include proposals for new and enhanced planting, retention of existing hedgerows and woodland, and landscape integration measures to reduce visual effects over time. In addition, the Scheme design incorporates minimum offsets from existing landscape features, including residential properties, ancient woodland, woodland, hedgerows, public rights of way and watercourses, to further limit visual impacts. Although these measures reduce the effects of the Scheme on nearly all receptors, as noted above there are 10 receptors which would experience Significant Visual Effects for the duration of the Scheme as set out Table 8-30 of the **LVIA [APP-060]**. Mitigation measures to address landscape and visual effects are set out in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**, **Figure 3-4-1 to 3-4-5.2 Landscape and Ecology Mitigation Plan [APP-084]**. The preparation, approval and implementation of detailed landscape and ecological management plans, substantially in accordance with the **OLEMP [APP-283]** and **OEPMS [APP-284]**, are secured through requirements in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that the identified mitigation measures are delivered and maintained throughout the lifetime of the Scheme.
SB-007	Socio-Economics, Tourism and Recreation	Loss of amenities for thousands of people such a footpaths, countryside views, quietness, being able to hear birdsong which are all essential for the well-being of communities Communities are being broken up by this proposal it is divisive and puts a	Noise, and landscape and visual impacts have been addressed in detail in the Applicant's responses to this Party above. A detailed assessment of the likely significance of effects from the Scheme on the use and desirability of individual PRoW and recreational access to the countryside is included in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation**

Reference	Theme	Comments/Issues Raised	Applicant's Response
		huge mental strain on thousands of people as would the building of the site if it were allowed.	**[APP-068]** and **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]**. This assessment considers the impact on individual recreational routes, including their practical use, enjoyment and desirability. The Applicant confirms that the majority of significant adverse effects can be mitigated. However, some significant adverse effects to users of PRoW and unsurfaced roads in Lime Down E during construction cannot be mitigated further. No significant residual effects are anticipated during the operational phase of the Scheme. The assessment in **ES Volume 1, Chapter 18: Human Health [APP-070]** also considers the physical and mental health impacts of changes to recreation and countryside access under the assessment topic 'open space, leisure and play', and concludes that no significant adverse effects are anticipated at any phase of the Scheme. The Applicant confirms that existing PRoW are to be protected as far as practicable within the Scheme design, with management measures set out in the **Outline Public Rights of Way and Permissive Paths Management Plan (PROWPPMP) [APP-282]**, confirmed as embedded mitigation in Section 16.9 of ES Chapter 16. New permissive access routes have been incorporated into the Scheme design, shown as Work No. 10 on the **Works Plan [APP-007]** and illustrated on **ES Volume 2, Figure 3-4: Landscape and Ecology Mitigation Plan [APP-084]**. These are identified as additional mitigation and enhancement measures in Section 16.11 of ES Chapter 16. The PRoW and Permissive Paths Management Plan is secured through Requirement 16 of Schedule 2 of the **Draft**

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Development Consent Order [APP-016]. The preparation, approval and implementation of the detailed Construction Environmental Management Plan and Construction Traffic Management Plan, substantially in accordance with the outline plans, are secured through Requirements 13 and 15 respectively in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that impacts on PRoW and recreational routes are appropriately managed during construction. The approach to recreation and access has been discussed with Wiltshire Council's Public Health team and is under discussion with Wiltshire Council's Countryside Access Team and is set out in the relevant Statement of Common Ground to be submitted at Deadline 1**.** Impacts on mental health and wellbeing are assessed in **ES Volume 1, Chapter 18: Human Health [APP-070].** This chapter provides a comprehensive assessment of the Scheme's potential effects on human health through consideration of a broad range of health determinants. These include access to open space and recreation, transport and connectivity, community identity and cohesion, employment and income, noise and vibration, air quality, and access to health and social care services. The assessment applies a health "*lens*" to the findings of relevant technical chapters and concludes that, with embedded mitigation and additional measures secured, the Scheme would not give rise to significant adverse effects on population health, including mental health and wellbeing. The assessment focuses on communities within a 2 km Study Area surrounding the Scheme, identified as those most likely to experience potential health-related effects. Baseline analysis demonstrates that rates of poor mental health within the Study

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Area are generally lower than national averages, and the assessment considers potential pathways by which the Scheme could influence mental wellbeing, including changes to environment, amenity, access and community factors. Residual effects following mitigation are assessed as not significant at any phase of the Scheme. Consultation with Wiltshire Council's Public Health Team has informed the approach to mental health considerations, as documented in **ES Volume 3, Appendix 18-1: Human Health Consultation [APP-244].** Through this engagement, the Applicant has committed to signposting locally available mental health and wellbeing resources to members of the public engaging with the Scheme, using information provided by Wiltshire Council's Public Health Team. The Applicant will continue to monitor consultation responses relating to mental health and will provide appropriate signposting to existing local support services where requested. The Applicant notes that the assessment methodology for health and wellbeing has been agreed with Wiltshire Council's Public Health team and is set out in the **Statement of Common Ground with Wiltshire Council** to be submitted at Deadline 1.
SB-008	Construction and Decommissioning	The panels would possibly be bought over from China, and their construction is not 'Green'	The effects of emissions generated from embodied carbon within products to be used on site (as well as construction, operation and decommissioning emissions) are all considered **in ES Volume 1, Chapter 7: Climate Change [APP-059].** The CO2e figures are included in detail within the chapter, which concludes that the emissions from these sources would be outweighed by the reduced emissions as a result of the Scheme contributing to decarbonisation of energy from the National Grid.
SB-009	Transport and Access	the narrow roads are not safe for large lorries and valuable hedgerows and verges would be destroyed which are	The Scheme has been designed through an iterative design process to retain existing hedgerows and grassland habitats as far as practicable. Potential impacts on hedgerows are

Reference	Theme	Comments/Issues Raised	Applicant's Response
		critical habitats for numerous wildlife and wildflowers. The roads would be congested and an increase in accidents would be likely and this would be continual over the 60 year period as upgrades , repairs and renewal of the various elements	assessed in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]** and **ES Volume 1, Chapter 10: Arboriculture [APP-062]**, which consider baseline conditions and evaluate likely effects on hedgerow features during construction, operation and decommissioning. The assessments identify that some hedgerow loss is required to facilitate access and infrastructure. However, anticipated hedgerow losses represent a small proportion of the existing hedgerow network within the Order Limits. With embedded mitigation in place, no significant adverse effects on hedgerow features are anticipated. Compensatory planting and enhancement measures are proposed which will significantly exceed the extent of hedgerow loss. Proposed new hedgerows and habitat enhancements are illustrated in **ES Volume 2, Figure 3-4: Landscape and Ecological Mitigation Plan [APP-084]** and detailed in the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]**. The preparation, approval and implementation of the detailed Landscape and Ecological Management Plan, substantially in accordance with the **OLEMP [APP-283]**, are secured through Requirement 7 in Schedule 2 of the Draft Development Consent Order [APP-016], ensuring hedgerow retention, replacement planting and long-term management are delivered and maintained throughout the lifetime of the Scheme. The potential effects of construction traffic on highway safety and accident risk are assessed in **ES Volume 1, Chapter 13: Transport and Access [APP-065]**, which considers changes in traffic flows, HGV movements and accident risk on the local road network. Links experiencing traffic increases above defined assessment thresholds were taken forward for detailed analysis. The effects of construction traffic on the local highway network are also assessed in **ES Volume 1, Chapter 13: Transport and Access [APP-065]**, which considers

Reference	Theme	Comments/Issues Raised	Applicant's Response
			construction vehicle routing, traffic volumes and potential impacts on highway safety and road condition. The assessment concludes that, with appropriate management measures in place, construction traffic effects can be appropriately controlled. Supporting technical evidence is provided in **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]**, which includes an assessment of baseline accident data and predicted changes in collision risk arising from construction traffic. The assessment concludes that the level of construction traffic associated with the Scheme is unlikely to materially affect road safety on links within the Study Area, and no significant adverse effects on accident risk are anticipated. Mitigation measures to manage construction traffic safely are set out in the **Outline Construction Traffic Management Plan (Outline CTMP) [APP-287]**, which includes defined vehicle routing, delivery scheduling and coordination with the local highway authority. The **Outline CTMP [APP-287]** also includes a road condition and dilapidation survey of minor roads not typically used by HGV traffic. Any damage to verges or carriageway surfaces caused by construction vehicles will be rectified to the satisfaction of the local highway authority. In addition, the **Outline CTMP [APP-287]** includes community liaison measures to keep local communities informed of construction activity and to provide a contact point for feedback should any issues arise. The preparation, approval and implementation of the final CTMP, substantially in accordance with the **Outline CTMP [APP-287]** , are secured through Requirement 15 of Schedule 2

Reference	Theme	Comments/Issues Raised	Applicant's Response
			of the **Draft Development Consent Order [APP-016]**, ensuring construction traffic is managed safely throughout the construction phase of the Scheme.
SB-010	Human Health	The disruption to everyday life would have a huge impact of numerous communities across the area leading to increased stress and possible mental illness through loss of value of people most valuable asset - their home, through noise, light and site pollution.	Impacts on mental health and wellbeing are assessed in **ES Volume 1, Chapter 18: Human Health [APP-070]**. This chapter provides a comprehensive assessment of the Scheme's potential effects on human health, including mental health and wellbeing, through consideration of a broad range of health determinants. These include access to open space and recreation, transport and connectivity, community identity and cohesion, employment and income, noise and vibration, air quality, and access to health and social care services. The assessment applies a health "lens" to the findings of relevant technical chapters and concludes that, with the embedded mitigation and additional measures secured through the relevant management plans **[APP-277** to **APP-287]** secured by their respective requirements in Schedule 2 to the **Draft DCO [APP-016]**, the Scheme would not give rise to significant adverse effects on population health, including mental health and wellbeing. Mitigation measures include (but are not limited to) ensuring PROWs remain open as much as is practicable, HGV movements are set to defined routes and within set hours, community liaison and engagement is maintained, and construction impacts on noise and air quality are regulated. With specific regard to community liaison, this is directly secured through Requirement 4 in Schedule 2 to the **Draft DCO [APP-016]** through the provision of a community liaison group. This group will act as an intermediary between the public and the onsite contractors to ensure community concerns and any information they need are communicated and responded to, so as to reduce community anxiety and impacts on mental wellbeing, and to assist in directing the public to mental health support if required.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			The assessment in **ES Volume 1, Chapter 18: Human Health [APP-070]** focuses on communities within a 2 km Study Area surrounding the Scheme, identified as those most likely to experience potential health-related effects. Baseline analysis demonstrates that rates of poor mental health within the Study Area are generally lower than national averages, and the assessment considers potential pathways by which the Scheme could influence mental wellbeing, including changes to environment, amenity, access and community factors. Residual effects of the Scheme on health following mitigation are assessed as not significant at any phase of the Scheme. Consultation with Wiltshire Council's Public Health Team has informed the approach to mental health considerations, as documented in **ES Volume 3, Appendix 18-1: Human Health Consultation [APP-244].** Through this engagement, the Applicant has committed to signposting locally available mental health and wellbeing resources to members of the public engaging with the Scheme, using information provided by Wiltshire Council's Public Health Team. The Applicant will continue to monitor consultation responses relating to mental health and will provide appropriate signposting to existing local support services where requested. The Applicant notes that the assessment methodology for health and wellbeing has been agreed with Wiltshire Council's Public Health team and is set out in the relevant Statement of Common Ground to be submitted at Deadline 1. Impacts of the Scheme on property prices have not been assessed as these have been agreed by the Planning Inspectorate to be scoped out of assessment in the ES, as set out in **ES Volume 3, Appendix 1-2: Scoping Opinion Response Table [APP-181].**

Reference	Theme	Comments/Issues Raised	Applicant's Response
SB-011	Soils and Agriculture	The loss of essential farmland makes us more reliant on Imports, this together with the import of the panels and the construction of the site (which will possible have to be renewed/upgraded/repaired numerous times over the 60 year period) and destruction of unique countryside makes it very hard for this proposal to be described as' Green'. I consider it to be driven by greed. Give each village a small Solar area to power the village...	An assessment of the potential effects of the Scheme on soils and agricultural land is provided in **ES Volume 1, Chapter 17 Soils and Agriculture [APP-069]**. This chapter considers baseline agricultural land quality, including Best and Most Versatile (BMV) land, and assesses likely significant effects arising from construction, operation and decommissioning of the Scheme, together with embedded mitigation measures. The areas of each Agricultural Land Classification (ALC) grade affected by the Scheme are set out in Section 17.10 of **ES Volume 1, Chapter 17: Soils and Agriculture [APP-069]**. Of the agricultural land within the Solar PV Sites, approximately 477.4 hectares (around 67%) is classified as Subgrade 3b or Grade 4 and is therefore not BMV land. There is no Grade 1 land, around 30.8 hectares (approximately 4%) of Grade 2 land, and approximately 209.3 hectares (around 29%) of Subgrade 3a land. The distribution of ALC grades is shown in **ES Volume 2, Figure 17-2: Agricultural Land Classification Mapping [APP-172]**. The Applicant has had regard to agricultural land quality in the design and site selection process and has sought, where practicable, to locate infrastructure on lower quality land. The Scheme will result in a temporary but long-term and reversible loss of agricultural land for the operational life of the Scheme. As set out in **ES Volume 1, Chapter 17: Soils and Agriculture [APP-069]**, Section 17.10, this gives rise to a temporary, long-term moderate adverse effect on agricultural land overall, and a temporary, long-term major/moderate adverse effect on BMV land, both of which are assessed as significant. These effects are fully reported in the ES and are a matter for the Secretary of State to weigh in the planning balance against the need for the Scheme and its wider benefits. There are no significant permanent effects on agricultural land, as all land will be returned to its original use and condition as far as practicable following decommissioning.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			The Applicant notes that the approach to assessing the quality of the agricultural land is being discussed with Natural England and is set out in the relevant **Statement of Common Ground** to be submitted at Deadline 1. Measures to avoid and minimise effects on soils and agricultural land are embedded within the Scheme design and secured through the DCO. These include the preparation and implementation of a **Soil Resources Management Plan (SRMP) [APP-280],** which will control soil handling, storage and reinstatement during construction, operation and decommissioning, and a requirement to prepare and implement a Decommissioning Strategy in accordance with the **Outline Decommissioning Strategy [APP-279]**. Through the establishment and maintenance of long-term grassland beneath and between the solar arrays, soil health, quality and structure are anticipated to improve over the lifetime of the Scheme, resulting in a temporary, moderate beneficial effect on soil resources at decommissioning, which is assessed as significant (Sections 17.10 and 17.12 of **ES Volume 1, Chapter 17: Soils and Agriculture [APP-069]**). National policy and government guidance, as set out in the **Statement of Need [APP-266]**, recognise that while rooftop and smaller-scale solar installations are an important part of the energy mix, they cannot alone meet the scale of capacity required to achieve clean power and net zero objectives. Large-scale ground-mounted solar therefore remains necessary in addition to, not instead of, rooftop solar. **ES Volume 1, Chapter 7: Climate Change [APP-059]** assesses greenhouse gas (GHG) emissions across the full life cycle of the Scheme, including the manufacture, transport,

Reference	Theme	Comments/Issues Raised	Applicant's Response
			installation, operation, maintenance and decommissioning of Scheme components. This assessment includes embodied carbon associated with materials and components, as well as operational emissions savings arising from renewable electricity generation. The assessment concludes that, while emissions are associated with the manufacture and construction of the Scheme, these are outweighed over time by the carbon savings achieved through the displacement of fossil fuel-derived electricity generation. When considered over its operational lifetime, the Scheme would result in a net reduction in GHG emissions compared to a 'without Scheme' scenario and would make a meaningful contribution to the UK's legally binding carbon budgets and transition to net zero. The Applicant notes the concerns about the reasons behind the Scheme. The Scheme aims to help meet national targets for clean energy and net zero targets set out in legislation and policy. The aim is to deliver long term environmental benefit alongside a secure energy supply. The Applicant is committed to meeting all planning, environmental, and construction policies and standards. The Scheme is being developed in line with legal and regulatory requirements, with engagement with all statutory and non-statutory bodies, ensuring quality and accountability throughout.
SB-012	Description and DCO Process	...don't pour this bankrupt countries tax payers funds into the purse of a foreign developer to the detriment of local communities who will lose all they hold dear and the reason for them choosing to live in the countryside. Please don't let this go	The Applicant confirms that Lime Down Solar Park is being developed solely through private sector financing and that it has not received, and is not receiving any public money, subsidy or funding in the development of the Scheme. The Applicant is confident that the proposed management and mitigation measures set out in the **ES [APP-052 to APP-265]**

Reference	Theme	Comments/Issues Raised	Applicant's Response
		ahead. Stand up for what is important for our irreplaceable land	are comprehensive and robust and that the Scheme aligns with national and local planning policy; this is outlined in the **Planning Statement [APP-267]**. Of particular reliance are Annex A: National Policy Statement Accordance Tables and Annex B: Local Policy Accordance Tables, of the Planning Statement which set out an appraisal of the Scheme against the policies.

6.40 Anna Kate Fuller

Table 6-40 RR-0339

Reference	Theme	Comments/Issues Raised	Applicant's Response
AKF-001	Description and DCO Process Landscape and Visual	I object to the Lime Down Solar plans and urge the Planning Inspectorate to thoroughly examine the numerous harms that these plans would cause and to recommend rejection. Inappropriate Location & Loss of Countryside a) I have lived here since I was 11. This is a rural, unspoilt, peaceful, and beautiful area that I love deeply. b) The open countryside, where we enjoy seeing the crops grow with the seasons, forms the vital setting for the Cotswolds National Landscape. Industrialising it fundamentally undermines the protection this designation is meant to guarantee.	National Policy Statement EN-3 Paras 2.10.11 and 2.10.18 explain that the availability of grid connection, suitable irradiance levels, and local topography are key inputs to the selection of sites suitable for large-scale solar generation developments. The number of locations within the UK at which large-scale solar generation is suitable is therefore likely to be limited, and this is a material issue when considering how the UK is to meet the urgent need for low carbon generation as is set out in the NPSs. This point is expanded upon in the **Statement of Need [APP-266]** in particular in Section 4.3. Chapter 8 of the **Statement of Need [APP-266]** provides evidence to support the suitability of the proposed location of the Scheme for large-scale solar plus storage in relation to the timeliness and availability of the grid connection, transmission system operability and the decarbonisation and energy security benefits the Scheme will bring forward from this location. As set out in **ES Volume 1, Chapter 4 Alternatives and Design Evolution [APP-056]** and the Site Selection Assessment Report at **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]** an appraisal of alternative sites within a 20km radius of the Existing National Grid Melksham Substation has been undertaken, which concludes that there are no more suitable locations within the 20km search area than the proposed location for the Scheme. The Scheme has been designed to deliver the greatest possible benefit from the available land and the available grid connection, whilst avoiding, minimising and/or mitigating harmful environmental effects. As per the description set out in **ES Volume 1, Chapter 3: The Scheme [APP-055]** the total area within the DCO Order Limits encompasses approximately 1,237 hectares (ha). Of this, the 'Solar PV Sites' comprise approximately 749.1 ha of land.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Around 479.5 ha of this land is proposed as being required for installation of solar PV, battery storage, and associated infrastructure. The remaining 269.5 ha would provide areas dedicated to ecological mitigation, measurable Biodiversity Net Gain (BNG) delivery, landscaping, offsets and agricultural land managed for environmental enhancement and habitat creation. The Applicant remains committed to delivering a Scheme that makes a meaningful contribution to the UK's transition to net zero, while also seeking to minimise adverse impacts and maximise opportunities for environmental enhancement and community benefits. The landscape and visual effects of the Scheme, including effects on the Fosse Way and its setting, are assessed in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**. The Landscape and Visual Impact Assessment (LVIA) identifies users of the Fosse Way as visual receptors and evaluates likely effects during construction, operation and decommissioning using realistic worst-case design parameters. The Fosse Way runs adjacent to Sites B and C through the Scheme and is made of seven separate receptors which have been assessed in full. The Sequential effects for users of the Fosse Way are not considered to be any greater than those effects identified for the individual sections as set out within **ES Volume 3, Appendix 8.3 ES LVIA Assessment Sheets [APP-189-194]**. Moderate Adverse effects on Receptor No TR145: Fosse Way were identified as a result of Site C with no greater effects identified as a result of Site B. Refer to **ES Chapter**, **Appendix 8-3-2-2-1 - Landscape and Visual Assessment Sheets [APP-191].** The assessment found that there would be temporary Moderate Adverse effects during the construction and Year 1 on views from The Fosse Way which would reduce Minor at Year

Reference	Theme	Comments/Issues Raised	Applicant's Response
			15 and No effect at Decommissioning as a result of the proposed mitigation planting. The Scheme design has been refined through an iterative design process to avoid and reduce visual effects on the Fosse Way. This includes the removal of solar panels from fields adjacent to the Fosse Way where significant visual effects were identified, together with the introduction of landscape buffers and new planting to further reduce visibility of infrastructure from the route and its surrounding landscape. The Cotswolds National Landscape (CNL) is fully assessed as a standalone receptor within **ES Volume 3, Appendix 8.6: Assessment of Effects on the Special Qualities of the Cotswolds National Landscape [APP-197]**. This assessment considers the effects of the Scheme on landscape character, visual amenity and the special qualities of the CNL, including tranquillity. The assessment found that there would be some short term impact to landscape character within the setting of the CNL but due to the avoidance measures embedded within the Scheme, harm to the CNL itself would be minimal with beneficial effects in the long term which would further the purposes of the designation. In respect of visual amenity, some short-term adverse effects would be experienced by a small number of visual receptors with views to and from the CNL. However, these would reduce over time as a result of the proposed mitigation. The assessment of effects on the special qualities of the CNL scoped out 3 SQs as there is no association with the Site. The assessment found that there are no direct effects on the remaining SQs. There are some Minor/ Negligible short-term effects on a small number of visual receptors within the

Reference	Theme	Comments/Issues Raised	Applicant's Response
			setting of the CNL which effect SQ7 -Tranquillity and SQ13 Archaeology and historic associations. However, these effects are mitigated by Year 15 when proposed vegetation has matured. The assessment also found that there would be beneficial effects on SQ 6 – Biodiversity and nature recovery as a result of the delivery of approximately 119.7 hectares of flower-rich neutral grassland (as defined in the BNG assessment) and SQ 12 - An accessible landscape as a result of the delivery of approximately 12.8km of new permissive paths within the setting of the CNL. The remaining SQs would remain entirely intact. Details of the proposed landscape mitigation measures are set out in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060], ES Volume 2, Figure 3-4-1 to 3-4-5.2 Landscape and Ecology Mitigation Plan [APP-084]** the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283],** and the **Outline Ecological Protection and Mitigation Strategy (OEPMS) [APP-284]**. The preparation, approval and implementation of detailed landscape and ecological management plans, (substantially in accordance with the **OLEMP**) and a detailed ecological protection and mitigation strategy (substantially in accordance with the **OEPMS**) are secured through Requirements 7 and 8 respectively in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that visual mitigation measures are delivered and maintained throughout the lifetime of the Scheme.

Reference	Theme	Comments/Issues Raised	Applicant's Response
AKF-002	Soils and Agriculture	c) Solar farms should be sited on brownfield land, industrial estates, rooftops, or near motorways-"not on our valuable farmland. This proposal would change the landscape forever.	An assessment of the potential effects of the Scheme on soils and agricultural land is provided in **ES Volume 1, Chapter 17 Soils and Agriculture [APP-069]**. This chapter considers baseline agricultural land quality, including Best and Most Versatile (BMV) land, and assesses likely significant effects arising from construction, operation and decommissioning of the Scheme, together with embedded mitigation measures. The areas of each Agricultural Land Classification (ALC) grade affected by the Scheme are set out in Section 17.7 of **ES Volume 1, Chapter 17: Soils and Agriculture [APP-069]**. Of the agricultural land within the Solar PV Sites, approximately 477.4 hectares (around 67%) is classified as Subgrade 3b or Grade 4 and is therefore not BMV land. There is no Grade 1 land, around 30.8 hectares (approximately 4%) of Grade 2 land, and approximately 209.3 hectares (around 29%) of Subgrade 3a land. The distribution of ALC grades is shown in **ES Volume 2, Figure 17-2: Agricultural Land Classification Mapping [APP-172]**. The Applicant has had regard to agricultural land quality in the design and site selection process and has sought, where practicable, to locate infrastructure on lower quality land. The Scheme will result in a temporary but long-term and reversible loss of agricultural land for the operational life of the Scheme. As set out in **ES Volume 1, Chapter 17: Soils and Agriculture [APP-069]**, Section 17.10, this gives rise to a temporary, long-term moderate adverse effect on agricultural land overall, and a temporary, long-term major/moderate adverse effect on BMV land, both of which are assessed as significant. These effects are fully reported in the ES and are a matter for the Secretary of State to weigh in the planning balance against the need for the Scheme and its wider benefits. There are no significant permanent effects on agricultural land, as all land will be returned to its original use and condition as far as practicable following decommissioning.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			The Applicant notes that the approach to assessing the quality of the agricultural land is under further discussion with Natural England and is set out in the relevant **Statement of Common Ground** to be submitted at Deadline 1. Measures to avoid and minimise effects on soils and agricultural land are embedded within the Scheme design and secured through the DCO. These include the preparation and implementation of a **Soil Resources Management Plan (SRMP) [APP-280]**, which will control soil handling, storage and reinstatement during construction, operation and decommissioning, and a requirement to prepare and implement a Decommissioning Strategy in accordance with the **Outline Decommissioning Strategy [APP-279]**. Measures to avoid and minimise effects on soils and agricultural land are embedded within the Scheme design and secured through Schedule 2, Requirement 17 of the **Draft DCO [APP-016]** which includes the preparation and implementation of a Soil Resources Management Plan (SRMP) in accordance with the **Outline SRMP [APP-280].** The SRMP will control soil handling, storage and reinstatement during construction, operation and decommissioning, and a requirement to prepare and implement a Decommissioning Strategy in accordance with the **Outline Decommissioning Strategy [APP-279],** which is secured by Schedule 2, Requirement 20 of the **Draft DCO [APP-016]**. Through the establishment and maintenance of long-term grassland beneath and between the solar arrays, soil health, quality and structure are anticipated to improve over the lifetime of the Scheme, resulting in a temporary, moderate beneficial effect on soil resources at decommissioning, which is assessed

Reference	Theme	Comments/Issues Raised	Applicant's Response
			as significant (Section 17.10 and 17.12 of **ES Volume 1, Chapter 17: Soils and Agriculture [APP-069]**, Sections 17.10 and 17.12). In relation to suggestions that brownfield land or alternative locations should be used, including rooftop, these matters are addressed in **ES Volume 1, Chapter 4 Alternatives and Design Evolution** and in the **Statement of Need [APP-056 and APP-266]**. The Applicant has considered alternatives, including previously developed land and other forms of solar deployment, as part of the site selection and design evolution process. As shown in Table 2-2 of **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]**, the Applicant has considered previously developed land/brownfield land over 1 hectare within the area of search, based on the brownfield land registers of the relevant Local Planning Authorities, and concluded that none of the sites are large enough to provide a viable land parcel of at least 40 ha and sites were not considered to be available as they have planning permission for residential development and/or are allocated for residential/mixed use development. National policy and government guidance, as set out in the **Statement of Need [APP-266]**, recognise that while rooftop and smaller-scale solar installations are an important part of the energy mix, they cannot alone meet the scale of capacity required to achieve clean power and net zero objectives. Large-scale ground-mounted solar therefore remains necessary in addition to, not instead of, rooftop solar.
AKF-003	Human Health Noise and Vibration	Negative Impact on Residents a) Mental & Emotional Toll: The consultation process has already caused immense stress, anxiety, and exhaustion. I am deeply anxious about	<u>Mental Health and Wellbeing</u> Impacts on mental health and wellbeing are assessed in **ES Volume 1, Chapter 18: Human Health [APP-070]**. This chapter provides a comprehensive assessment of the Scheme's

Reference	Theme	Comments/Issues Raised	Applicant's Response
		the "*ghastly*" construction noise, constant drilling, and increased traffic. I am also very concerned about the constant hum of cooling fans once operational. At night, it is beautifully quiet-"I hear owls hooting. I do not believe the noise impact has been sufficiently assessed.	potential effects on human health, including mental health and wellbeing, through consideration of a broad range of health determinants. These include access to open space and recreation, transport and connectivity, community identity and cohesion, employment and income, noise and vibration, air quality, and access to health and social care services. The assessment applies a health "lens" to the findings of relevant technical chapters and concludes that, with the embedded mitigation and additional measures secured through the relevant management plans **[APP-277** to **APP-287]** secured by their respective requirements in Schedule 2 to the **Draft DCO [APP-016]**, the Scheme would not give rise to significant adverse effects on population health, including mental health and wellbeing. Mitigation measures include (but are not limited to) ensuring PROWs remain open as much as is practicable, HGV movements are set to defined routes and within set hours, community liaison and engagement is maintained, and construction impacts on noise and air quality are regulated. With specific regard to community liaison, this is directly secured through Requirement 4 in Schedule 2 to the **Draft DCO [APP-016]** through the provision of a community liaison group. This group will act as an intermediary between the public and the onsite contractors to ensure community concerns and any information they need are communicated and responded to, so as to reduce community anxiety and impacts on mental wellbeing, and to assist in directing the public to mental health support if required. The assessment in **ES Volume 1, Chapter 18: Human Health [APP-070]** focuses on communities within a 2 km Study Area surrounding the Scheme, identified as those most likely to experience potential health-related effects. Baseline

Reference	Theme	Comments/Issues Raised	Applicant's Response
			analysis demonstrates that rates of poor mental health within the Study Area are generally lower than national averages, and the assessment considers potential pathways by which the Scheme could influence mental wellbeing, including changes to environment, amenity, access and community factors. Residual effects of the Scheme on health following mitigation are assessed as not significant at any phase of the Scheme. Consultation with Wiltshire Council's Public Health Team has informed the approach to mental health considerations, as documented in **ES Volume 3, Appendix 18-1: Human Health Consultation [APP-244].** Through this engagement, the Applicant has committed to signposting locally available mental health and wellbeing resources to members of the public engaging with the Scheme, using information provided by Wiltshire Council's Public Health Team. The Applicant will continue to monitor consultation responses relating to mental health and will provide appropriate signposting to existing local support services where requested. The Applicant notes that the assessment methodology for health and wellbeing has been agreed with Wiltshire Council's Public Health team and is set out in the relevant Statement of Common Ground to be submitted at Deadline 1. <u>Construction noise</u> The noise and vibration impacts arising from construction activities are assessed in Section 14.10 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**. For the purposes of the assessment, a reasonable worst-case scenario assuming piling activities has been considered. Mitigation measures associated with construction activity are presented in Section 14.9 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]** and are committed to through the **Outline Construction**

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Environmental Management Plan [APP-277]. A noise monitoring programme agreed with Wiltshire Council will be carried out during construction. The preparation, approval and implementation of the Construction Environmental Management Plan, substantially in accordance with the **Outline CEMP [APP-277]**, is secured through Requirement 13 in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that construction noise and vibration are appropriately controlled. With these measures in place, the assessment concludes that no significant effects from construction noise or vibration are expected. <u>Construction traffic</u> The potential effects of construction traffic on the local highway network are assessed in **ES Volume 1, Chapter 13: Transport and Access [APP-065]**, which considers construction vehicle movements, traffic volumes, road safety and effects on road users. This included the capacity of local roads and infrastructure to accommodate construction vehicles with consideration of construction traffic volumes, vehicle types, route suitability, and network performance. The assessment concludes that the level of construction traffic associated with the Scheme is unlikely to materially affect road safety on links within the Study Area, and no significant adverse effects on accident risk are anticipated. The assessment additionally concludes that with appropriate mitigation such as the Construction Traffic Management Plan in

Reference	Theme	Comments/Issues Raised	Applicant's Response
			place to manage construction vehicle movements, there would be no significant adverse impacts on the local highway network during the construction, operation maintenance, and decommissioning phases of the Scheme. An **Outline Construction Traffic Management Plan (CTMP) [APP-287]** has been prepared and submitted with the DCO application. The aim of the CTMP is to ensure that the effect of the construction phase on the local highway network is minimised. The **Outline CTMP [APP-287]** sets out measures to coordinate construction deliveries by HGVs to arrive and depart between 09:30 and 16:30 where possible, to avoid peak network hours of 08:00–09:00 and 17:00–18:00. It also includes a community liaison element to keep local communities informed about the construction process and to provide a contact for feedback should any issues arise. Compliance with the CTMP will be monitored by the Developer, Contractor and Wiltshire Council as local highway authority. The preparation, approval and implementation of the final CTMP, substantially in accordance with the outline CTMP, are secured through Requirement 15 of Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring construction traffic impacts are appropriately managed throughout the construction phase of the Scheme. <u>Operational noise</u> The noise impacts from the operation of the Scheme and its components are assessed in Section 14.10 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**, with supporting modelling provided in **ES Volume 3, Appendix 14-4: Noise**

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Modelling [APP-237]. A penalty has been applied to predicted noise levels from the Solar PV Sites to account for the distinctive nature of the sound. Potential mitigation measures are detailed in Section 14.9 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**, and with such measures in place, significant effects from operational noise are not expected. The **Outline Operational Environmental Management Plan [APP-278]** commits to noise levels from the Scheme at residential dwellings being the same as or below those modelled in the ES. This provides assurance that significant effects from operational noise will be avoided, while allowing flexibility in how this is achieved. The preparation, approval and implementation of the detailed OEMP, substantially in accordance with the outline plan, are secured through Requirement 14 of Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring operational noise is appropriately controlled throughout the lifetime of the Scheme.
AKF-004	Socio-Economics, Tourism and Recreation	b) Financial Impact: Our property value has been reduced since this proposal was announced. A (Redacted)house in Alderton is failing to sell due to the plans. This is a real concern that local estate agents are afraid to discuss openly, but it must be properly addressed.	Impacts of the Scheme on property prices have not been assessed as these have been agreed by the Planning Inspectorate to be scoped out of assessment in the ES, as set out in **ES Volume 3, Appendix 1-2: Scoping Opinion Response Table [APP-181]**.
AKF-005	Soils and Agriculture	Food Security & Destruction of Irreplaceable Habitats a) This land has been successfully farmed for generations. Using 30%	The potential effects of the Scheme on agricultural land are assessed in **ES Volume 1, Chapter 17 Soils and Agriculture [APP-069]**, which considers baseline agricultural land use and quality and evaluates likely effects during construction, operation and decommissioning. The assessment confirms that

Reference	Theme	Comments/Issues Raised	Applicant's Response
		Best and Most Versatile (BMV) agricultural land for solar panels directly undermines UK food security. b) There is a glaring legal contradiction: they propose taking fertile land out of production for 60 years for 'biodiversity', yet promise to restore it to agriculture. Their 30-year Biodiversity Net Gain (BNG) commitment conflicts with the 60-year lease. Which legal obligation will be abandoned? c) The site contains ancient hedgerows and habitats. These are irreplaceable. Promises to 'translocate' them show a fundamental misunderstanding-"they are complex ecosystems, not just plants. Their loss would be permanent.	the Scheme will result in a temporary and reversible loss of agricultural land during the operational period, with all land to be returned to its original use and condition as far as practicable following decommissioning. No permanent loss of agricultural land is anticipated. The Applicant does not consider that food security will be compromised by the Scheme (or solar energy more widely). The latest figures to September 2024 indicate that solar occupied around 21,200 ha of agricultural land in the UK. In 2025, 545,000 ha of arable land in England were left uncropped (source: Department for Environment, Food & Rural Affairs, Agricultural land use in England at 1 June 2025). It should also be noted that food security is not identified as an issue within the suite of Energy National Policy Statements or the National Planning Policy Framework (NPPF). Further, the Government's UK Solar Roadmap (2025) states that solar development is not considered to compromise food security, but that the climate and nature crisis poses the greatest long-term risk to food security- a risk which the Scheme directly helps to address by providing a secure, low-carbon source of electricity. As set out in Section 2 of the **Outline Decommissioning Strategy [APP-279],** post-decommissioning of the Scheme, the landowners would choose how the land is to be used and managed. The landowner may return all of the land to arable use, although it is likely that established habitats such as hedgerows and woodland would be retained given their potential benefits to agricultural land and the wider farming estate. Potential impacts of the Scheme on ecology and biodiversity

Reference	Theme	Comments/Issues Raised	Applicant's Response
			are assessed in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**, which considers baseline conditions and evaluates likely effects during construction, operation and decommissioning. The assessment identifies embedded and additional mitigation measures and concludes that, with these measures in place, no unacceptable significant adverse effects on ecology and biodiversity are anticipated. The Applicant notes that the approach to identifying and securing mitigation measures is under discussion with Wiltshire Council, Natural England and the Environment Agency and is set out in the relevant **Statements of Common Ground** to be submitted at Deadline 1. A comprehensive package of habitat retention, creation, enhancement and long-term management measures is proposed to avoid, reduce and mitigate impacts and to deliver Biodiversity Net Gain. These include the protection of existing habitats, restoration of lost features such as historic ponds, creation of new habitats, and long-term ecological management to improve habitat quality over the lifetime of the Scheme. The ecological mitigation and enhancement proposals are illustrated in **ES Volume 2, Figure 3-4: Landscape and Ecological Mitigation Plan [APP-084]** and detailed in the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]** and the **Outline Ecological Protection and Mitigation Strategy (OEPMS) [APP-284]**. The **OLEMP [APP-283]** includes provisions for habitat establishment, maintenance and ecological monitoring to confirm that mitigation and enhancement measures are functioning as intended and to identify and implement remedial measures where required. The preparation, approval and implementation of the detailed

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Landscape and Ecological Management Plan and Ecological Protection and Mitigation Strategy, substantially in accordance with the **OLEMP [APP-283]** and **OEPMS [APP-284]**, are secured through Requirements 7 and 8 in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that ecological mitigation and enhancement measures are delivered, monitored and maintained throughout the lifetime of the Scheme. In the context of Biodiversity Net Gain (BNG), biodiversity units delivered by the Scheme as calculated by the Statutory Biodiversity Metric must be secured for a minimum of 30 years in accordance with relevant legislation requirements pertaining to BNG. Although BNG for NSIPs is not yet mandatory, the Applicant has sought to meet the requirements as if it were. After 30 years post-development, it is likely that all retained, newly-created and enhanced habitats will continue to be managed to maximise ecological benefit for the remaining lifespan of the Scheme, in accordance with the OLEMP [APP-283] The Scheme has been designed through an iterative design process to retain existing hedgerows and grassland habitats as far as practicable. Potential impacts on hedgerows are assessed in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]** and **ES Volume 1, Chapter 10 Arboriculture [APP-062]**, which consider baseline conditions and evaluate likely effects on hedgerow features during construction, operation and decommissioning. The assessments identify that some hedgerow loss is required to facilitate access and infrastructure. However, anticipated hedgerow losses represent a small proportion of the existing hedgerow network within the Order Limits. With embedded

Reference	Theme	Comments/Issues Raised	Applicant's Response
			mitigation in place, no significant adverse effects on hedgerow features are anticipated. Compensatory planting and enhancement measures are proposed which will significantly exceed the extent of hedgerow loss. Proposed new hedgerows and habitat enhancements are illustrated in **ES Volume 2, Figure 3-4: Landscape and Ecological Mitigation Plan [APP-084]** and detailed in the **OLEMP [APP-283]**. The preparation, approval and implementation of the detailed Landscape and Ecological Management Plan, substantially in accordance with the **OLEMP [APP-283]**, are secured through Requirement 7 in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring hedgerow retention, replacement planting and long-term management are delivered and maintained throughout the lifetime of the Scheme.
AKF-006	Ecology and Biodiversity Site selection and Alternatives	Inadequate Surveys & Lack of Evidence a) The ecological evidence is fundamentally flawed. Surveys for key protected species (e.g., dormice, reptiles, otters) are absent, out-of-date, or insufficient. b) The cable route is a particular blind spot with almost no species-specific surveys. You cannot assume species aren't there; you must survey. c) The applicant lacks the material evidence needed for a competent decision on environmental impacts.	The scope of ecological and species-specific survey within the Cable Route Corridor (CRC) was defined using a proportionate, risk-based approach. Survey scope and effort across the Order Limits were targeted to areas and features where there was a reasonable likelihood of significant effects, rather than applied uniformly across the Order Limits irrespective of risk. The assessment has had regard to the short-term, temporary and construction-phase nature of works within the CRC, the absence of permanent operational effects, and a robust appraisal of habitat suitability for species based on baseline habitats data collected through surveys. Based on this a reduced survey effort within the CRC has been undertaken compared to the Solar PV Sites. Potential impacts within the CRC, including temporary habitat loss, disturbance and fragmentation, have been assessed on a precautionary reasonable worst-case basis. This assumes that

Reference	Theme	Comments/Issues Raised	Applicant's Response
			construction works within the CRC will be progressive over the approximate 18-month period. Embedded mitigation and further controls secured through the **OEPMS [APP-284]**, including pre-construction surveys and inspections, micro-siting of cabling works, appointment of an Ecological Clerk of Works and species-specific protection measures, where appropriate, provide a recognised mechanism for managing residual risk. Furthermore, reinstatement of any disturbed habitats will take place as a priority following construction within the CRC. Is it the Applicant's view that the baseline information is considered sufficient to support a robust and proportionate assessment of likely significant effects within the CRC, and the conclusions of **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]** remain appropriate and justified. Potential impacts of the Scheme on dormice, reptiles and otters are assessed in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**, which considers baseline conditions and evaluates the likely effects during construction, operation and decommissioning. The **ES [APP-052 to APP-265]** and environmental and ecological surveys have been undertaken by competent experts with considerable experience assessing similar schemes. Details of qualifications, experience and professional institute membership are provided within **ES Volume 3, Appendix 1-1 Statement of Competence [APP-180]**.
AKF-007	Construction and Decommissioning Transport and Access	Construction Chaos, Safety Risks & Habitat Fragmentation a) Over 20,000 additional vehicle movements will bring chaos and danger to our narrow country lanes, which are used by cyclists, horse riders, and residents. The roads are	Impacts on Non-motorised Users has been assessed in **ES Volume 1, Chapter 13: Transport and Access [APP-065]**. This has concluded no significant impact. Highway widths of construction routes have been assessed and provide sufficient width for HGV traffic to comfortably pass cyclists. Given the nature of the routes, there is a lack of

Reference	Theme	Comments/Issues Raised	Applicant's Response
	Ecology and Biodiversity	already hazardous when lorries pass. b) This traffic will sever vital wildlife corridors. The plan lacks a proper strategy for wildlife crossings, which will lead to animal deaths and further habitat fragmentation. c) As someone who drives between villages to teach, I fear the high risk of accidents and potential loss of life this traffic will cause. d) Local medical services (GPs, hospitals) are already stretched and will struggle to cope with hundreds of additional workers.	pedestrian infrastructure making it already unattractive as a walking route. The increase in HGV construction traffic will therefore not make a significant impact on the routes attractiveness for pedestrians. The potential effects of construction traffic on highway safety and accident risk are assessed in **ES Volume 1, Chapter 13: Transport and Access [APP-065]**, which considers changes in traffic flows, HGV movements and accident risk on the local road network. Links experiencing traffic increases above defined assessment thresholds were taken forward for detailed analysis. Supporting technical evidence is provided in **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]**, which includes an assessment of baseline accident data and predicted changes in collision risk arising from construction traffic. The assessment concludes that the level of construction traffic associated with the Scheme is unlikely to materially affect road safety on links within the Study Area, and no significant adverse effects in relation to accident risk are anticipated. As set out in the **Outline Construction Traffic Management Plan (Outline CTMP) [APP-287]**, a booking system will be set up to manage arrivals and departures to the Site. This will prevent HGVs generated by the Scheme passing each other in opposite directions on the local roads forming part of the construction routes and will be confirmed as part of the final CTMP. The **Outline CTMP [APP-287]** includes measures to manage deliveries and restricted hours of deliveries outside of peak

Reference	Theme	Comments/Issues Raised	Applicant's Response
			hours in order to minimise any detrimental impacts on the local highway network. Construction traffic would be temporary. The construction traffic is managed through a Final CTMP which is a requirement of the DCO. Road condition surveys will ensure any damage to the highway network caused by construction traffic is rectified. **ES Volume 1, Chapter 13: Transport and Access [APP-065]** concludes that the impact would be negligible to minor adverse. Construction routes will utilise existing highways suitable for vehicle movements. **ES Chapter 9: Ecology and Biodiversity [APP-061]** considers the potential for effects on protected and notable species of wildlife through fragmentation of habitat as a result of the Scheme. The assessment concludes there would not be any significant residual effects from this potential impact. The Applicant confirms that consideration of impacts to PROWs, unsurfaced roads, and the recreational use of the highway network has been assessed in **ES Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** and the supporting **ES Volume 3 Appendix 16-2 Tourism and Recreation Receptor Tables [APP-241]**. The Applicant confirms that the majority of significant adverse effects can be mitigated, however understands that some significant adverse effects to users of routes in Lime Down E or regionally important long-distance recreational routes cannot be mitigated further during construction. The assessment has considered the impacts to individual routes to build a picture of the likely impact on the overall PROW and highway network, determining that the overall effects within the 2 km Study Area is not a significant adverse effect at any stage of the Scheme. This is largely owing to the large number of PROWs and rural routes, given a great level of optionality to users, even in the presence of the Scheme.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			The Applicant has assessed the likely effect of inbound workers during construction on local medical services in **ES Chapter 18: Human Health [APP-070]** under the assessment heading 'Health and social care services'. The assessment has considered existing GP patient lists within 5 km of the Scheme, accessibility to primary healthcare services across the same area, and hospital A&E performance times at Swindon, Bath and Bristol, as well as understanding the health characteristics of the existing population to determine the likely effect inbound workers would have on these receptors. Additionally, the Applicant has committed to supporting construction workers in finding and registering with GPs across a wider 20 km area in reasonable proximity to their temporary or full-time accommodation, and where such GP surgeries have reasonable capacity to take on additional patients. This is secured through the **Outline CEMP [APP-277]** by Requirement 13 of Schedule 2 to the **Draft DCO [APP-016]**. The assessment concludes that during the construction phase, the residual level of effect on human health is up to a minor/negligible adverse effect as a result of predicted increased demand on healthcare services. This is not a significant effect.
AKF-008	Climate Change and Energy Need	Questionable Environmental & Carbon Credentials a) Has the project's full carbon footprint been examined? I am concerned it will not be carbon neutral once infrastructure, transport, and decommissioning are accounted for. b) What safeguards will ensure solar panels and batteries are free from modern slavery in their supply chains?	**ES Volume 1, Chapter 7: Climate Change [APP-059]** assesses greenhouse gas (GHG) emissions across the full life cycle of the Scheme, including the manufacture, transport, installation, operation, maintenance and decommissioning of Scheme components. This assessment includes embodied carbon associated with materials and components, as well as operational emissions savings arising from renewable electricity generation. The assessment concludes that, while emissions are associated with the manufacture and construction of the Scheme, these are outweighed over time by the carbon savings achieved through the displacement of fossil fuel-derived

Reference	Theme	Comments/Issues Raised	Applicant's Response
			electricity generation. When considered over its operational lifetime, the Scheme would result in a net reduction in GHG emissions compared to a 'without Scheme' scenario and would make a meaningful contribution to the UK's legally binding carbon budgets and transition to net zero. Island Green Power is part of the Solar Energy UK Supply Chain Commitment, which binds the Applicant to ensuring that our supply chains are free of slavery. As part of this, the solar sector in the UK and Europe has launched the Solar Stewardship Initiative, which independently inspects and certifies individual factories for sustainable and ethical practices. The Applicant would expect to source our panels from factories that are SSI-accredited.
AKF-009	Construction and Decommissioning	Lack of Long-Term Accountability & "*Temporary*" Myth a) A 60-year project, with a high likelihood of repowering, is permanent for our community. It is not "*temporary*". b) Will there be a legally binding bond for decommissioning and full restoration? Who will be responsible? c) How will the panels be recycled? Without a legally secured fund (a commuted sum) and a detailed, binding management plan, promises of restoration and biodiversity gain are meaningless.	A requirement to decommission the Scheme is part of the DCO application; failing to comply with that requirement would be a criminal offence. Decommissioning is also covered in agreements with landowners, which includes decommissioning securities to cover the cost of decommissioning in the event of any breach. Such securities are regularly revalued and topped up if necessary to ensure the solar farm would be fully removed and land restored. Should the operating company become insolvent before decommissioning, the solar farm would be an asset that would be sold or would pass to creditors, along with the obligation to decommission it. The company cannot be wound up voluntarily if there are outstanding obligations, which would include the decommissioning commitments made to landowners. Decommissioning is secured through Requirement 20 in Schedule 2 of the **Draft Development Consent Order [APP-016]**. The Applicant has produced an **Outline Decommissioning Strategy [APP-279]** as part of the EIA submitted with the DCO Application. A final decommissioning strategy will be prepared and agreed with the relevant

Reference	Theme	Comments/Issues Raised	Applicant's Response
			authorities at that time of decommissioning and will include detailed measures and timescales. As set out in the **Funding Statement [APP-019]** submitted with the DCO Application, the Applicant is committed to ensuring that appropriate financial provisions are in place to cover decommissioning costs at the end of the operational life of the Scheme. The **Outline Operational Environmental Management Plan (Outline OEMP) [APP-278],** secured by Schedule 2, Requirement 14 of the **Draft DCO [APP-016]**, sets out the commitment of the Applicant to maximise recycling and reuse of the Scheme components at the end of their life. Section 4 of **ES Volume 1, Chapter 20: Other Environmental Matters [APP-072]** sets out that due to the market and policy trends, it is assumed that specialist regional or national facilities would be in place at the time of component replacement e.g. solar panels and batteries and decommissioning, and these would be developed in response to demand generated by the UK-wide solar PV panel industry and would be reused, recycled, or recovered and not disposed of to landfill. Details of how the panels and Battery Energy Storage System (BESS) will be disposed of are provided within Section 4 of **ES Volume 1, Chapter 20: Other Environmental Matters [APP-072]** which states that recycling routes are generally available for component replacement waste at present, and it is likely that there will be even greater opportunities for recycling in the future, not least because the recycling market will have expanded to meet demand as solar PV installations increase. It is likely that the solar PV panels and battery waste generated by the Scheme, during operation and maintenance and decommissioning phases, would be managed by specialist

Reference	Theme	Comments/Issues Raised	Applicant's Response
			regional or national facilities; these facilities would be developed over the operation and maintenance phase of the Scheme in response to demand generated by the UK-wide solar energy industry. The capacity of such facilities is not expected to be influenced by other non-solar farm projects in the surrounding area; this is because the facilities will only be managing specific solar PV panel waste. In addition, private sector waste companies will develop these facilities to respond to market demands. At present, solar PV panel waste generation is low, therefore there is a limited demand for facilities and their associated limited available capacity. It is therefore expected that the facilities which reuse, recycle, or recover end of-life solar PV panels will be developed as the quantities of this waste stream increase. The Waste Electrical and Electronic Equipment (WEEE) Regulations and The Waste Batteries and Accumulators (Amendment) Regulations place obligations on companies who place solar PV panels and batteries on the market to finance the costs of collection, treatment, recovery and environmentally sound disposal; and the landfill tax strongly incentivise reuse, recycling and recovery. The preparation and implementation of the detailed Operational Environmental Management Plan, substantially in accordance with the **Outline OEMP [APP-278]**, is secured through Requirement 14 in Schedule 2 of the **Draft Development Consent Order [APP-016]**.
AKF-010	Socio-Economics, Tourism and Recreation Landscape and Visual	Damage to Tourism, Recreation & Visual Impact a) Tourism is vital to our local economy. The area is popular with walkers and cyclists, including those on the historic Fosse Way. b) The industrialisation of this	The potential effects of the Scheme on tourism and recreation are assessed in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]**, supported by **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]**. The assessment considers baseline tourism activity, visitor attractions, recreational assets and tourism-dependent businesses within the study area.

Reference	Theme	Comments/Issues Raised	Applicant's Response
		landscape will destroy the rural tranquillity and historic character that visitors seek. People will not come to walk past miles of solar panels.	The assessment evaluates potential effects on the use, enjoyment and desirability of nearby tourism destinations, including impacts on individual visitor attractions, recreational routes, events and businesses reliant on tourism. It also considers whether changes to landscape character or visual amenity could influence visitor behaviour. The assessment identifies a worst-case scenario in which a temporary loss of up to 50 tourism-related jobs could occur locally during construction, and a long-term loss of up to 11 tourism-related jobs could occur during the operational phase of the Scheme. This represents a precautionary estimate based on conservative assumptions. The assessment concludes that, while some localised effects on tourism receptors are anticipated to occur, significant adverse effects on the wider tourism economy are not anticipated. These findings are fully reported in the ES and will be weighed in the planning balance alongside the Scheme's wider economic and environmental benefits. The Applicant notes that the approach to assessment of tourism impacts is under discussion with Wiltshire Council's Economic and Regeneration Team and is set out in the Statement of Common Ground with Wiltshire Council to be submitted at Deadline 1. The landscape and visual effects of the Scheme, including effects on the Fosse Way and its setting, are assessed in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**. The Landscape and Visual Impact Assessment (LVIA) identifies users of the Fosse Way as visual receptors and evaluates likely effects during construction, operation and decommissioning

Reference	Theme	Comments/Issues Raised	Applicant's Response
			using realistic worst-case design parameters. The Scheme design has been refined through an iterative design process to avoid and reduce visual effects on the Fosse Way. This includes the removal of solar panels from fields adjacent to the Fosse Way where significant visual effects were identified, together with the introduction of landscape buffers and new planting to further reduce visibility of infrastructure from the road and its surrounding landscape. The potential effects of the Scheme on the cultural heritage of the Fosse Way and associated Roman archaeological assets are fully assessed in **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, supported by detailed technical appendices in **ES Volume 3, Appendices 12-1 to 12-7 [APP-219 to APP-231]**. **Appendix 12.1: Heritage Statement [APP-219]** identified that the overall setting and significance of the Fosse Way will remain intact, and the asset will retain its legibility as a roadway within a largely agrarian landscape. Consequently, no significant effects were identified to the asset. The Applicant notes that the approach to the assessment in relation to the Fosse Way has been agreed with Historic England and the methodology for the mitigation strategy is under discussion with Historic England and is set out in the relevant Statement of Common Ground to be submitted at Deadline 1. Details of the proposed landscape mitigation measures are set out in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**, Figure 3-4-1 to 3-4-5.2 **Landscape and Ecology Mitigation Plan [APP-084]** and the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]**, and the **Outline Ecological Protection and Mitigation Strategy (EPMS) [APP-284]**.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			The preparation, approval and implementation of detailed landscape and ecological management plans, substantially in accordance with the OLEMP, are secured through Requirement 7 in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that visual mitigation measures are delivered and maintained throughout the lifetime of the Scheme. In addition, effects on the setting of the Fosse Way as a heritage asset are assessed in **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, which concludes that, with the design refinements and secured mitigation in place, effects on the setting of the Fosse Way are appropriately managed. Since the design presented at PEIR stage, Field C26, the westernmost part of Field C25, and the majority of Field C13 have been entirely removed from the Order Limits. Solar PV Panels have also been removed entirely from within Fields B1-B5, C24-C25, and C13. A number of fields abutting the Fosse Way within which Solar PV Panels will be erected have had offsets established with their boundaries with Fosse Way, including Fields B6, C10-C12, and C22-C23. **Appendix 12.1: Heritage Statement [APP-219]** identified that the overall setting and significance of the Fosse Way will remain intact, and the asset will retain its legibility as a roadway within a largely agrarian landscape. Consequently, no significant effects were identified to the asset. A detailed assessment of the likely significance of effects from the Scheme on the use and desirability of individual PRoWs and recreational access to the countryside is included in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** and **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]**. This assessment considers the impact on individual recreational

Reference	Theme	Comments/Issues Raised	Applicant's Response
			routes, including their practical use, enjoyment and desirability. The Applicant notes that the approach to recreation and access to the countryside has been agreed with Wiltshire Council's Public Health team and is under discussion with Wiltshire Council's Countryside Access Team. This is set out in the Statement of Common Ground with Wiltshire Council to be submitted at Deadline 1.
AKF-011	Description and DCO Process	Final point. The applicant's case is built on insufficient evidence, vague plans, and unresolved contradictions. The profound harm to our community's health, safety, wellbeing, and irreplaceable environment is clear. I ask the Examining Authority to recognise these fundamental flaws and recommend that development consent is REFUSED.	The **ES [APP-052 to APP-265]** and environmental and ecological surveys have been undertaken by competent experts with considerable experience assessing similar schemes. Details are provided within ES Volume 3, Appendix 1-1 Statement of Competence [APP-180]. The Applicant is confident that the management and mitigation measures proposed are comprehensive and robust and that the Scheme aligns with national and local planning policy; this is outlined in the **Planning Statement [APP-267]**. The Applicant acknowledges that there will be impacts on the community as a result of the Scheme, which may be a source of concern for local residents. The Secretary of State will balance those potential impacts and changes against the urgent need and critical national priority for the Scheme as set out in Government policy. The Applicant has assessed adverse impacts arising from the Scheme and has also set out within the **ES [APP-052 – APP-065]** the steps taken to avoid, mitigate and minimise these impacts as far as possible, and has prepared a number of management plans that will ensure that impacts are kept to a minimum. These management plans are secured in the **Draft Development Consent Order [APP-016]**. Of particular relevance to the assessment of effects on local communities are **ES Volume 1, Chapter 8: Landscape and**

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Visual [APP-060], **Chapter 13: Transport and Access [APP-065], Chapter 14: Noise and Vibration [APP-066], Chapter 15: Air Quality [APP-067], Chapter 16: Socioeconomics, Tourism and Recreation [APP-068],** and **Chapter 18: Human Health [APP-070]**, all of which consider potential impacts on residential properties and local communities. Impacts on physical health and wellbeing are assessed in **ES Volume 1, Chapter 18: Human Health [APP-070].** This chapter provides a comprehensive assessment of the Scheme's potential effects on human health, including physical health and wellbeing, through consideration of a broad range of health determinants with physical health pathways. These include access to housing, access to open space and recreation, transport and connectivity, climate change, air quality, water quality, land quality, noise and vibration, and access to health and social care services. The assessment in **ES Volume 1, Chapter 18: Human Health [APP-070]** applies a health-based review of relevant technical chapters to identify potential pathways by which the Scheme could affect physical health. It concludes that, with the embedded mitigation and additional measures secured through the relevant management plans **[APP-277** to **APP-287]** secured by their respective requirements in Schedule 2 to the **Draft DCO [APP-016]**, the Scheme would not give rise to significant adverse effects on population physical health at any phase of the Scheme. Mitigation measures include (but are not limited to) ensuring PROWs remain open as much as is practicable, inbound workers are accommodated in the most suitable locations for housing and health service access, community liaison and

Reference	Theme	Comments/Issues Raised	Applicant's Response
			engagement is maintained, and construction impacts on waterways, soils, noise and air quality are regulated. Priority has been given in the assessment to communities most likely to experience potential health-related effects, within the 2 km Study Area surrounding the Scheme. The Applicant notes that the assessment methodology for health and wellbeing has been agreed with Wiltshire Council's Public Health team and is set out in the relevant Statement of Common Ground to be submitted at Deadline 1.
AKF-013	Hydrology, Flood Risk and Drainage Transport and Access Other Environmental Matters	Flooding, Water Contamination & Pollution a) Local roads already flood, causing chaos. I am very worried that cable route work in the field behind our property will increase flood risk, as water from that field already encroaches on our land. b) We rely on two boreholes for drinking water. How can we be certain they will not be contaminated? Who will pay for the clean up if it is? c) The proposed 8m buffers for watercourses are inadequate. Experts state 10-20m are needed to protect water quality and species like otters. d) A battery fire could cause toxic runoff to leach into the aquifer, contaminating the wider water supply. Battery Energy Storage System	The Applicant acknowledges concerns regarding existing localised flooding and the proximity of works to residential land. The flood risk assessment has been undertaken in accordance with national and local policy and concludes that the Scheme would not increase flood risk elsewhere, including during construction. Construction activities along the cable route are subject to controlled methods, pollution prevention and temporary drainage measures secured through the construction management framework, with works near watercourses subject to approval and oversight. **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [APP-063]** and **Outline Construction Environmental Management Plan [APP-277]**. In relation to private boreholes, groundwater receptors and pollution pathways are assessed using a source–pathway–receptor approach, and no credible mechanism has been identified by which the Scheme would contaminate groundwater or drinking water supplies. Construction and operational controls are secured to prevent pollution, with incident response measures in place. **ES Volume 1, Chapter 11 Hydrology, Flood Risk and Drainage [APP-063]**. Matters of liability and

Reference	Theme	Comments/Issues Raised	Applicant's Response
		(BESS) - Unacceptable Risks a) A BESS fire would pose an enormous risk to wildlife, residents, and the environment. Multiple homes are within 1,220 metres. b) What specific safeguards are in place? Are Dorset & Wiltshire Fire Service prepared and equipped for such a fire? What will happen to the polluted firefighting water?	remediation are governed by existing environmental permitting and pollution control regimes rather than the planning process. The Applicant does not agree that the proposed watercourse buffers are inadequate from a flood risk or water quality perspective. The standard flood risk buffer is applied to protect conveyance and allow maintenance access, while wider buffers are provided where required for ecological or access reasons and are secured through the Scheme design. Flood risk conclusions do not rely on buffer width alone but on the overall drainage strategy and controls. **Design Principles and Parameters [APP-269]**. In relation to BESS fire risk and firefighting water, the hydrological assessment does not identify an unacceptable risk of contamination to groundwater or surface waters. Firefighting water and any potentially contaminated runoff would be contained within sealed and controlled drainage systems associated with the BESS, with isolation, containment and controlled removal or discharge secured through the battery safety and drainage controls. These measures prevent uncontrolled release to ground or watercourses. **Outline Battery Safety Management Plan (OBSMP) [APP-286]**. No amendments to the application documents are required. The Applicant has followed National Fire Chiefs Council (NFCC) guidance and commissioned a Plume Assessment Study to model toxic gas emissions and visibility impacts from a BESS fire on all sensitive receptors within a 1km radius of the BESS area. The fire emissions modelled in the report were based upon recent UK Health Security Agency (UKHSA) requests for DCO BESS projects which explore both immediate air quality impacts together with annual UK air quality requirements. The UKHSA is a statutory consultee for the Scheme and has

Reference	Theme	Comments/Issues Raised	Applicant's Response
			confirmed that they are satisfied with the Applicant's submitted documentation and Plume Assessment Study methodology and results. Six worst case BESS fire locations (i.e. locations within the BESS Area closest to sensitive receptors) have been modelled as depicted in **ES Volume 2, Figure 15-5: Battery Energy Storage System Fire Emissions Study Area [APP-166]**. The concentrations of carbon monoxide (CO), formaldehyde, hydrogen chloride (HCl), hydrogen cyanide (HCN), hydrogen fluoride (HF), ammonia (NH_3), nitrogen dioxide (NO2) and particulates from a potential BESS fire have been modelled using an air quality dispersion model to determine the likely effects on human health. A high-level visibility assessment has also been undertaken using the modelled particulates results to determine the effect of BESS fire emissions on visibility on the local road and rail network to inform the **OBSMP [APP-286].** The Plume Assessment Study has concluded that there are no significant toxic emission or visibility impacts at all sensitive receptor locations. The Applicant has also committed to commissioning an additional Plume Analysis Study at the detailed design stage as stipulated in Section 5.5.9 of the **OBSMP [APP-286]** and secured through the DCO: "*..at the detailed design stage a BESS system and site specific Plume Analysis study will be conducted to assess the environmental impact of a site incident to sensitive receptors within a 1 km radius. Toxic gas emissions to sensitive receptors must be below relevant public health exposure limit guidelines when the battery system of a BESS is*

Reference	Theme	Comments/Issues Raised	Applicant's Response
			fully consumed (burnt out), production of Particulate Matter (PM) and a visibility impact assessment on any transport links within a 1 km radius of the BESS area will also be included. The ERP produced at the detailed design stage (template outlined in Section 5.4.9 -5.4.11) will incorporate all necessary emergency response procedures and actions based upon thermal runaway test data supplied by the BESS system provider." An **OBSMP [APP-286]** has been prepared for the Scheme using guidance from Dorset and Wiltshire Fire and Rescue Service and incorporating recommendations of the National Fire Chiefs Council. The safety objectives for the design of the BESS site are listed in Section 2.4 of the **OBSMP [APP-286]**. The **OBSMP [APP-286]** will be amended at Deadline 1 to fully accommodate the latest BESS safety requirements contained in NFPA 855 (2026) ensuring that any credible risks associated with battery storage are either prevented or fully mitigated if a BESS failure occurs. Section 2.4.2 of the OBSMP stipulates that: *"Final BESS design and site layout will have been validated through mandatory Large Scale Fire Testing (LSFT) and rigorous consequence modelling to minimise the requirement for any D&WFRS intervention in a thermal runaway incident. LSFT must establish minimum equipment spacing distances that demonstrate there is no fire propagation to adjacent BESS enclosures or ESS equipment. D&WFRS intervention in worst case scenarios would typically be limited to boundary cooling of adjacent BESS and Energy Storage System (ESS) units to prevent the fire from spreading. This strategy will be finalised with D&WFRS and be clearly communicated in the Emergency Response Plan (ERP);*

Reference	Theme	Comments/Issues Raised	Applicant's Response
			• *To ensure that fire, smoke, and any release of toxic gases does not significantly impact site operatives, first responders, and the local community; and* • *To ensure that firewater run-off is contained and tested before release or, if necessary, removed by tanker and treated offsite."* As set out in the **OBSMP [APP-286]**, the BESS Area will have a robust and validated Emergency Response Plan (ERP), developed in consultation with Dorset & Wiltshire Fire and Rescue Service at the detailed design stage. Section 5.4 of the OBSMP specifies the typical emergency response protocols, procedures and safety information that will be included in ERPs. ERPs will be drafted and approved for all stages of the Scheme, including construction, operation, and decommissioning. The Applicant's ERP template includes all requirements specified in both NFCC and NFPA 855 guidance and recommendations. Section 5.4.9 – 5.4.11 of the **OBSMP [APP-286]** stipulates that the ERP will follow NFCC and NFPA 855 (2026) guidelines and stipulates the minimum content that an ERP must contain, including: *"Emergency procedures for all credible hazards and risks, including building, infrastructure and vehicle fire, wildfires, impacts on local respondents, impacts on transport infrastructure."* All risk assessments to be conducted at detailed design for BESS projects required by the Health and Safety Executive (HSE) to assess fire and explosion risk are stipulated in Section 6.1.5. Section 5 of the **OBSMP [APP-286]** covers all requisite firefighting requirements for the Scheme including fire service access, firefighting water supply, and emergency planning requirements. The Applicant is in the process of agreeing a **Statement of Common Ground** (SOCG) with D&WFRS to provide assurance that all safety and emergency response requirements are fulfilled. Site design ensures that D&WFRS

Reference	Theme	Comments/Issues Raised	Applicant's Response
			would not have to travel or operate in a smoke plume / vapor cloud. As now mandated under NFPA 855 (2026), the Applicant will only be able to select a BESS system that has undertaken Large Scale Fire Testing (LSFT). At the detailed design stage, the selected BESS LSFT data will be leveraged to fully inform inputs for risk assessment tools which will be utilized together with detailed consequence modelling to provide a comprehensive site operations and emergency response safety audit, this is stipulated in the OBSMP pre-construction requirements (Section 6). Section 6.1.3 – 6.1.7 of the **OBSMP [APP-286]**defines key risk assessments and consequence modelling reports required by NFPA 855, NFCC guidance, and HSE BESS safety requirements. These risk assessment tools minimize BESS failure risks, mitigate BESS failure scenarios, and minimize fire propagation risks. The **OBSMP [APP-286]** is secured through Requirement 6 (Battery safety management) in Schedule 2 of the **Draft DCO [APP-016]**, which provides that Work No. 2 must not commence until a Battery Safety Management Plan has been submitted to and approved by the relevant planning authority. The approved plan must be substantially in accordance with the Outline Battery Safety Management Plan. The Draft DCO also requires the relevant planning authority to consult with Dorset and Wiltshire Fire and Rescue Service and the Environment Agency before determining the application, and that the Battery Safety Management Plan must be implemented as approved.

6.41 Sarah Payne

Table 6-41 RR-4280

Reference	Theme	Comments/Issues Raised	Applicant's Response
SPE-001	Noise and Vibration Socio-Economics, Tourism and Recreation	I strongly object to the Lime Down proposal. Noise The batteries storage will destroy my life I relish the peaceful part of the world that we live,myself and my family spend all our leisure time outside in the garden and the countryside. The noise from the pilers, will equally disrupt my life for the months or years it takes these panels to be installed. Batteries noisy at night, so will disrupt my sleep- leading to sleep deprivation.	The noise and vibration impacts arising from construction activities are assessed in Section 14.10 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**. Mitigation measures are committed to through the **Outline Construction Environmental Management Plan [APP-277]**. In particular, as presented in Table 14-18 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**, average levels at Surrendel are expected to be around 54 dB which while audible is well below levels likely to give rise to significant adverse effects on health or quality of life. Additionally, noise from the installation of solar PV panels will be spread across the site over the course of the construction period and therefore will only be at the levels presented in Table 14-18 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]** for the closest set of works. As a reasonable worst-case this assessment includes the noise from piling rigs that will be larger and louder than those used in practice. A noise monitoring programme agreed with Wiltshire Council will be carried out during construction. The preparation, approval and implementation of the Construction Environmental Management Plan, substantially in accordance with the **Outline CEMP [APP-277]**, is secured through Requirement 13 in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that construction noise and vibration are appropriately controlled. With these measures in place, the assessment concludes that no significant effects from construction noise or vibration are expected. The noise impacts from the operation of the Scheme and its components are assessed in Section 14.10 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**. As shown in Table 9 of **ES Volume 3, Appendix 14-4: Noise Modelling**

Reference	Theme	Comments/Issues Raised	Applicant's Response
			[APP-237], night-time noise levels at Surrendel would be at the typical existing background sound level. With reference to WHO guidelines on night-time noise, this means that, even with windows open, they would be conducive to a good night's sleep. The **Outline Operational Environmental Management Plan [APP-278]** commits to noise levels from the Scheme at residential dwellings being the same as or below those modelled in the ES. This provides assurance that significant effects from operational noise will be avoided, while allowing flexibility in how this is achieved. The preparation, approval and implementation of the detailed OEMP, substantially in accordance with the outline plan, are secured through Requirement 14 of Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring operational noise is appropriately controlled throughout the lifetime of the Scheme.
SPE-002	Ecology and Biodiversity	2.Environmental: The Habitat for hedgehogs and badgers hates and Skylarks will be destroyed by the installation and the fencing of the solar panels.	Potential impacts of the Scheme on hedgehog are assessed in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**. Paragraphs 9.10.232 to 9.10.234 conclude that the cessation of intensive agriculture, together with habitat creation and enhancement measures (including tussocky grassland, hedgerow planting and buffer zones), would result in a beneficial effect for hedgehog, significant at the Local level. Mitigation and enhancement measures are secured through the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]** and **Outline Ecological Protection and Mitigation Strategy (OEPMS) [APP-284]**, secured by Requirements 7 and 8 of the **Draft Development Consent Order [APP-016]**. Potential impacts of the Scheme on skylarks are assessed in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-**

Reference	Theme	Comments/Issues Raised	Applicant's Response
			061], which considers baseline bird assemblages and evaluates likely effects on breeding farmland bird species during construction, operation and decommissioning. The assessment identifies skylarks as a key species of conservation interest within the Scheme area. It concludes that a proportion of the current skylark population will be displaced from the Solar PV Sites, which will give rise to an adverse residual effect at a Local level. The Applicant notes that the approach to the assessment with relation to skylark is under discussion with Wiltshire Council and is set out in the relevant **Statement of Common Ground** to be submitted at Deadline 1. Skylark-specific mitigation and habitat enhancement measures are incorporated into the Scheme design to reduce effects as far as practicable. These include the provision of suitably large, open set-aside and grassland habitats designed to provide appropriate breeding and foraging conditions. These measures are illustrated in **ES Volume 2, Figure 3-4: Landscape and Ecological Mitigation Plan [APP-084]** and detailed in the **OLEMP [APP-283]**. Measures to safeguard nesting skylarks during construction, including timing restrictions on vegetation clearance and pre-construction ecological checks, are set out in the **OEPMS [APP-284]**. The preparation, approval and implementation of the detailed Landscape and Ecological Management Plan and Ecological Protection and Mitigation Strategy, substantially in accordance with the **OLEMP [APP-283]** and **OEPMS [APP-284]**, are secured through Requirements 7 and 8 in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring

Reference	Theme	Comments/Issues Raised	Applicant's Response
			skylark mitigation and long-term habitat management measures are delivered and maintained throughout the lifetime of the Scheme. Potential effects of boundary treatments and fencing on ecology and wildlife movement are assessed in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**, which considers impacts on habitats and species during construction, operation and decommissioning and identifies measures to avoid or mitigate barriers to wildlife movement. The Scheme design incorporates fencing around the Solar PV Arrays that is permeable to wildlife, with the exception of deer. This means animals (excluding deer only) will be able to freely access habitats within the Solar PV Sites without the need for wildlife gates. In addition, wide buffers are retained around the peripheries of the Solar PV Sites to allow wildlife, including deer, to move between favoured habitats. These measures are described in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]** and detailed in the **Outline Ecological Protection and Mitigation Strategy OEPMS [APP-284]**. Fencing will be subject to regular inspection and maintenance to ensure continued permeability to wildlife and effective functioning over the lifetime of the Scheme. Measures for ongoing ecological management and maintenance are set out in the **OLEMP [APP-283]**. The preparation, approval and implementation of the detailed Ecological Protection and Mitigation Strategy and Landscape and Ecological Management Plan, substantially in accordance with the **OEPMS [APP-284]** and **OLEMP [APP-283]**, are secured through Requirements 8 and 7 respectively in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that fencing design and maintenance measures

Reference	Theme	Comments/Issues Raised	Applicant's Response
			are delivered and maintained throughout the lifetime of the Scheme.
SPE-003	Construction and Decommissioning Transport and Access	3.Cable construction site will destroy our life at Surrendell, our lane is a single track lane and only two passing places on the one mile track , if lorries and workers van were to accidentally drive up our lane it would be chaos .All the lanes locally are very narrow , it's already tight to pass a lorry when driving a car, so two HGV s passing will be dangerous and completely destroy the verges , the heavy Lorrie's will undoubtably destroy the roads. It seems ridiculous to me that the solar panels are over 20 km from the grid connection- Who will police the traffic ?	The assessment presented in Annex H of **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]** demonstrates adequate carriageway width or frequency of passing place opportunity to pass at least an HGV and a light vehicle as requested in comments provided by Wiltshire Council in its response (August 2025) to the Transport Assessment Scoping Note and confirmed in Paragraph 4 of 'Appendix A - Highways and Transport Document Review - Detailed Comments'. This confirms that no passing bay or widening improvements are needed to accommodate these movements on the construction route outside of the Order Limits. The distances between passing points outside of the Order Limits are all within 150 m with forward visibility extending to the next passing point and beyond. This is within the generally accepted distance of 200 metres. As set out in the **Outline Construction Traffic Management Plan (Outline CTMP) [APP-287]**, a booking system will be set up to manage arrivals and departures to the Order Limits. This will be implemented in coordination with banksmen, which will be able to hold back any cross-over, should there be any delays on the roads. This will prevent HGVs generated by the Scheme passing each other in opposite directions on the local roads forming part of the construction routes and will be confirmed as part of the final CTMP. Regarding routes through the Hulavington area, excessive widening of existing rural routes to allow two HGVs to pass would be over engineering, because of the following reasons: • temporary nature of the construction period;

Reference	Theme	Comments/Issues Raised	Applicant's Response
			• trip generation of 76 HGVs on the route to Lime Down D is an estimate of the deliveries on a peak day, so does not represent a daily average; • trip generation of 76 HGVs on the route to Lime Down D is based on the worst-case assumptions, including but not limited to, all phases and Solar PV Sites being constructed simultaneously and a 50% uplift; • average number of HGV construction movements along the route to Lime Down D is only 50 per day/7 per hour/one every 8 minutes (less than the journey time along the route); • assuming a realistic construction programme, the average number of HGV construction movements along the route to Lime Down D is only 32 per day/5 per hour/one every 13 minutes (less than the journey time along the route); • delivery times during the construction phase are limited to those times set out in the **Outline CTMP [APP-287]**. There will be no HGV construction trips outside of these hours; • there would be a much greater impact on hedgerow, trees and character; and • low level of existing HGVs on the route to Lime Down D (average number of existing HGV movements is only 46 per day, with some of these movements occurring outside of proposed construction hours set out in the **Outline CTMP [APP-287]**) Regarding routes through the Foss Way area, excessive widening of existing rural routes to allow two HGVs to pass would be over engineering, because of the following reasons: temporary nature of the construction period;

Reference	Theme	Comments/Issues Raised	Applicant's Response
			• trip generation of 16 HGVs on the route to Lime Down A is an estimate of the deliveries on a peak day, so does not represent a daily average; • trip generation of 16 HGVs on the route to Lime Down A is based on the worst-case assumptions, including but not limited to, all phases and Solar PV Sites being constructed simultaneously and a 50% uplift; • average number of HGV movements along the route to Lime Down A is only 10 per day/less than 2 per hour/one every 42 minutes (less than the journey time along the route), with the construction phase for Lime Down Site A only lasting 9 months • delivery times during the construction phase are limited to those times set out in the **Outline CTMP [APP-287]**. There will be no HGV trips outside of these hours; • impact on hedgerow, trees and character; and • low level of existing HGVs on the route to Lime Down A (average number of existing HGV movements is only 40 per day, with some of these movements occurring outside of proposed construction hours set out in the **Outline CTMP [APP-287]**) Regarding routes through the Alderton area, excessive widening of existing rural routes to allow two HGVs to pass would be over engineering, because of the following reasons: • temporary nature of the construction period; • trip generation of 50 HGVs on the route to Lime Down A-C is an estimate of the deliveries on a peak day, so does not represent a daily average; • trip generation of 50 HGVs on the route to Lime Down A-C is based on the worst-case assumptions, including

Reference	Theme	Comments/Issues Raised	Applicant's Response
			but not limited to, all phases and Solar PV Sites being constructed simultaneously and a 50% uplift; • average number of HGV construction movements along the Route to Lime Down A-C route is only 32 per day/7 per hour/one every 8 minutes (less than the journey time along the route); • assuming a realistic construction programme, the average number of HGV construction movements along the route to Lime Down A-C is only 17 per day/less than 3 per hour/one every 25 minutes (less than the journey time along the route) • delivery times during the construction phase are limited to those times set out in the **Outline CTMP [APP-287]**. There will be no HGV trips outside of these hours; • impact on hedgerow, trees and character; and • low level of existing HGVs on the route to Lime Down A-C (average number of existing HGV movements is only 20 per day, with some of these movements occurring outside of proposed construction hours set out in the **Outline CTMP [APP-287]** Further detail of trip generation has also been added to **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]** which will be submitted at Deadline 1 of Examination. To provide further comfort, additional information has been added to **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]** which will be submitted at Deadline 1 of Examination. This demonstrates that there is adequate carriageway width and/or passing place opportunity for two HGVs.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			The **Outline CTMP [APP-287]** includes measures to manage routes, deliveries and restricted hours of deliveries outside of peak hours in order to minimise any detrimental impacts on the local highway network. Construction traffic would be temporary. The construction traffic is managed through a Final CTMP which is a requirement of the DCO. Road condition surveys will ensure any damage to the highway network caused by construction traffic is rectified. **ES Volume 1, Chapter 13: Transport and Access [APP-065]** concludes that the impact would be negligible to minor adverse. Construction vehicle movements will be managed through a Construction Traffic Management Plan. An **Outline CTMP [APP-287]** has been prepared and submitted with the DCO application. The aim of the CTMP is to ensure that the effect of the construction phase on the local highway network is minimised. The **Outline CTMP [APP-287]** sets out measures to coordinate construction deliveries by HGVs to arrive and depart between 09:30 and 16:30 where possible, to avoid peak network hours of 08:00–09:00 and 17:00–18:00. It also includes a community liaison element to keep local communities informed about the construction process and to provide a contact for feedback should any issues arise. Compliance with the CTMP will be monitored by the Developer, Contractor and Wiltshire Council as local highway authority. The preparation, approval and implementation of the final CTMP, substantially in accordance with the outline CTMP, are secured through Requirement 15 of Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring construction traffic impacts are appropriately managed throughout the construction phase of the Scheme.

Reference	Theme	Comments/Issues Raised	Applicant's Response
SPE-004	Human Health	4.Mental well being:As for the inverters and battery storage this will be a huge hazard for horse riders in the area. We live in the countryside for a reason to enjoy country pursuits for our mental and physical health . No cycling no walking no riding will lead to unhealthy and unhappy residents of this tranquil beautiful countryside we choose to live.No one in their right mind would choose to live next to or surrounded by thousands of 4.5 meter solar panels.	Public rights of way such as bridleways and byways and the use of the highway network for recreational users have been considered as specific recreational receptors in the assessment in the **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]**. The likely effects on individual PROWs are specifically assessed in **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]**. The Applicant confirms that the majority of significant adverse effects can be mitigated, however understands that some significant adverse effects to users of routes in Lime Down E cannot be mitigated further during construction. No significant residual effects are anticipated during the operational phase of the Scheme. The Applicant has committed to ensuring the operation or recreational use of PROWs is protected as much as possible through the implementation of embedded and additional mitigation measures set out in the **OCTMP [APP-287]** and **OPROWPPMP [APP-282]**, secured respectively by Requirements 15 and 16 in Schedule 2 to the **Draft DCO [APP-016]**. An assessment on safety and accidents is provided in **ES Volume 1, Chapter 13: Transport and Access [APP-065]**. Links with traffic increases above identified thresholds, were taken forward for further assessment. As part of the assessment, it is concluded that the level of construction traffic associated with the Scheme is unlikely to materially affect road safety on the links in the Study Area. A detailed assessment of the likely significance of effects from the Scheme on the use and desirability of individual PRoWs and recreational access to the countryside is included in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** and **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]**. This assessment considers the impact on individual recreational

Reference	Theme	Comments/Issues Raised	Applicant's Response
			routes, including their practical use, enjoyment and desirability. The assessment in **ES Volume 1, Chapter 18: Human Health [APP-070]** goes on to assess the physical and mental health impacts of changes to recreation and countryside access under the assessment topic 'open space, leisure and play', finding that no significant adverse effects are anticipated at any phase of the Scheme. The Applicant notes that the approach to recreation and access to the countryside has been agreed with Wiltshire Council's Public Health team and is under discussion with Wiltshire Council's Countryside Access Team. This is set out in the Statement of Common Ground with Wiltshire Council to be submitted at Deadline 1. The Scheme has been designed to deliver the greatest possible benefit from the available land and the available grid connection, whilst avoiding, minimising and/or mitigating harmful environmental effects. As per the description set out in **ES Volume 1, Chapter 3: The Scheme [APP-055]** the total area within the DCO Order Limits encompasses approximately 1,237 hectares (ha). Of this, the 'Solar PV Sites' comprise approximately 749.1 ha of land. Around 479.5 ha of this land is proposed as being required for installation of solar PV, battery storage, and associated infrastructure. The remaining 269.5 ha would provide areas dedicated to ecological mitigation, measurable Biodiversity Net Gain (BNG) delivery, landscaping, offsets and agricultural land managed for environmental enhancement and habitat creation. The Applicant remains committed to delivering a Scheme that makes a meaningful contribution to the UK's transition to net zero, while also seeking to minimise adverse impacts and

Reference	Theme	Comments/Issues Raised	Applicant's Response
			maximise opportunities for environmental enhancement and community benefits
SPE-005		The hedgerow is habitat for a diverse number of forna and flora	The Scheme has been designed through an iterative design process to retain existing hedgerows and grassland habitats as far as practicable. Potential impacts on hedgerows are assessed in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]** and **ES Volume 1, Chapter 10: Arboriculture [APP-062]**, which consider baseline conditions and evaluate likely effects on hedgerow features during construction, operation and decommissioning. The assessments identify that some hedgerow loss is required to facilitate access and infrastructure. However, anticipated hedgerow losses represent a small proportion of the existing hedgerow network within the Order Limits. With embedded mitigation in place, no significant adverse effects on hedgerow features are anticipated. Compensatory planting and enhancement measures are proposed which will significantly exceed the extent of hedgerow loss. Proposed new hedgerows and habitat enhancements are illustrated in **ES Volume 2, Figure 3-4: Landscape and Ecological Mitigation Plan [APP-084]** and detailed in the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]**. The preparation, approval and implementation of the detailed Landscape and Ecological Management Plan, substantially in accordance with the **OLEMP [APP-283]**, are secured through Requirement 7 in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring hedgerow retention, replacement planting and long-term management are delivered and maintained throughout the lifetime of the Scheme.

Reference	Theme	Comments/Issues Raised	Applicant's Response
SPE-006	Hydrology, Flood Risk and Drainage	5. Flooding. The Gauze brook floods now some roads are in passable , the panels will make it worse.	An assessment of the effects of the Scheme on watercourses and flood risk, including potential impacts on Gauze Brook, is provided in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [APP-063]**, with supporting detail contained in the Flood Risk Assessment and Drainage Strategy appendices, including Appendix 11: Flood Risk Assessment and Drainage Strategy [APP-210 to APP-218]. The Applicant notes that the approach to Gauze Brook is under discussion with the Environment Agency and is set out in the relevant **Statement of Common Ground** to be submitted at Deadline 1. The Flood Risk Assessment includes site-specific hydraulic modelling of Gauze Brook to understand existing flood behaviour and to assess potential changes arising from the Scheme. The assessment concludes that, with the proposed drainage design and mitigation in place, the Scheme would not increase the rate or volume of runoff entering Gauze Brook compared to pre-development conditions, and would not increase flood risk to downstream watercourses, infrastructure or communities. Measures to control runoff and manage surface water during construction and operation are set out in the outline drainage and construction management plans accompanying the Application. The preparation, approval and implementation of the detailed drainage and construction management plans, substantially in accordance with the outline plans, are secured through Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring flood risk to Gauze Brook is appropriately managed throughout the lifetime of the Scheme.
SPE-007	Cultural Heritage	6. Heritage:The Roman road, Fosse	The potential effects of the Scheme on the cultural heritage of the Fosse Way and associated Roman archaeological assets

Reference	Theme	Comments/Issues Raised	Applicant's Response
		way might be destroyed forever-leaving no heritage for our children and future generations.	are fully assessed in **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, supported by detailed technical appendices in **ES Volume 3, Appendices 12-1 to 12-7 [APP-219 to APP-231]**. The assessment identifies known Roman heritage assets, considers their significance, and evaluates likely effects during construction, operation and decommissioning, including effects on setting. **Appendix 12.1: Heritage Statement [APP-219]** identified that the overall setting and significance of the Fosse Way will remain intact, and the asset will retain its legibility as a roadway within a largely agrarian landscape. Consequently, no significant effects were identified to the asset. Since the design presented at PEIR stage, Field C26, the westernmost part of Field C25, and the majority of Field C13 have been entirely removed from the Order Limits. Solar PV Panels have also been removed entirely from within Fields B1-B5, C24-C25, and C13. A number of fields abutting the Fosse Way within which Solar PV Panels will be erected have had offsets established with their boundaries with Fosse Way, including Fields B6, C10-C12, and C22-C23. **Appendix 12.1: Heritage Statement [APP-219]** identified that the overall setting and significance of the Fosse Way will remain intact, and the asset will retain its legibility as a roadway within a largely agrarian landscape. Consequently, no significant effects were identified to the asset. Embedded mitigation measures to avoid or reduce harm to heritage assets are set out in Section 12.9 of **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, with additional mitigation detailed in Section 12.11. An overarching archaeological mitigation strategy is provided in **ES Volume 3, Appendix 12-6: Outline Archaeological Mitigation Strategy [APP-230]**.

Reference	Theme	Comments/Issues Raised	Applicant's Response
SPE-008	Description and DCO Process	7. Funding: It worries me that (Redacted) track record with (Redacted), entrusting such a scheme to some one with that track record	The Applicant acknowledges the expression of distrust towards the Scheme and has demonstrated compliance with all statutory requirements under the Planning Act 2008 and applicable legislation such as The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017. The Applicant is subject to legally binding DCO requirements. The Planning Act 2008 also contains enforcement provisions regarding compliance with the terms of a DCO. The DCO process itself incorporates enforceable mechanisms to regulate Scheme delivery. Any breach of development consent order or failure to comply with Requirements can result in enforcement action.
SPE-009	Landscape and Visual Ecology and Biodiversity	8. Lifestyle: I was born in Wiltshire and have lived at Surrendell, Grittleton for over 15 years- we moved here purely because the house was surrounded by beautiful peaceful countryside and I feel the country way of life will be completely changed by Lime Down Solar . 9. Visual / landscape : Myself and my friends and family regularly walk and cycle the roads and tracks around our home- it is important to all of us to spend quality time outside in the countryside we love, enjoying the views the wildlife and listening to the skylarks. The views will not only ruined by the miles of solar panels but the inverters and battery storage will turn the green scape into an industrial landscape .	The LVIA assessed Surrendel House as receptor RI028.- refer to **Appendix Volume 3, Appendix 8.3.1: Visual Assessment Sheets (Not carried through to the ES Assessment) [APP-189].** The Property was not taken forward to a full assessment due to the distance of approximately 548m and rising topography to the north of the property, meaning there is no intervisibility between Surrendell House and Lime Down Site C. The LVIA has fully assessed the effects of the Scheme on Public Rights of Way and Roads and recognises there are some Major/Moderate Adverse effects which cannot be mitigated – refer to Tables 8-20 and 8-21 Chapter 8: Landscape and Visual [APP-060]. The effects which cannot be mitigated predominantly relatates to footpaths which diagonally cross fields and where mitigation planting would not be appropriate in terms of landscape character and the legacy landscape. The Applicant has assessed the likely effects on the PROW network and the rural road network as a result of the Scheme in **ES Volume 1 Chapter 16: Socio-Economics, Tourism and**

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Recreation [APP-068] with individual PROWs assessed in **ES Volume 3 Appendix 16-2 Tourism and Recreation Receptor Tables [APP-241]**. No significant adverse effects to PROWs surrounding Surrendel House, Grittleton, or Hullavington, are anticipated as a result of the Scheme, subject to implementation of embedded and additional mitigation measures as secured through the **Outline Construction Traffic Management Plan [APP-287]** and **Outline Public Rights of Way and Permissive Paths Management Plan [APP-282]**, secured respectively by Requirements 15 and 16 in Schedule 2 to the **Draft DCO [APP-016]**. The assessment in **ES Volume 1, Chapter 18: Human Health [APP-070]** has considered the location specific impacts of onsite infrastructure. Therein, the assessment considers settlements like Grittleton and Hullavington as communities of greater sensitivity to changes in its visual surroundings due to its current rural setting, and the anticipated extent to which the Scheme will change that character and potentially the quality of life for residents and visitors. The assessment considers that whilst this effect would be long-term throughout the Scheme's construction, operational and decommissioning phases, it is not anticipated to be a significant adverse effect to mental health and wellbeing.
SPE-010	Transport and Access	10. Myself and many of my friends enjoy riding horses , the a number of lorries that are required to build Lime down really worries me as horses often can be spooked by lorries passing to close , and I fear they is a significant risk of an accident involving horses and lorries.This is also true for cyclist and runners.	Public rights of way such as bridleways and byways and the use of the highway network for recreational users have been considered as specific recreational receptors in the assessment in the **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]**. The likely effects on individual PROWs are specifically assessed in **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]**. The Applicant confirms that the majority of significant adverse effects can be mitigated, however understands that some significant adverse effects to users of routes in Lime Down E

Reference	Theme	Comments/Issues Raised	Applicant's Response
			cannot be mitigated further during construction. No significant residual effects are anticipated during the operational phase of the Scheme. The Applicant has committed to ensuring the operation or recreational use of PROWs is protected as much as possible through the implementation of embedded and additional mitigation measures set out in the **Outline Construction Traffic Management Plan [APP-287]** and **Outline Public Rights of Way and Permissive Paths Management Plan [APP-282]**, secured respectively by Requirements 15 and 16 in Schedule 2 to the **Draft DCO [APP-016]**. An assessment on safety and accidents is provided in **ES Volume 1, Chapter 13: Transport and Access [APP-065]**. Links with traffic increases above identified thresholds, were taken forward for further assessment. As part of the assessment, it is concluded that the level of construction traffic associated with the Scheme is unlikely to materially affect road safety on the links in the Study Area.

6.42 Richard Tanner

Table 6-42 RR-3970

Reference	Theme	Comments/Issues Raised	Applicant's Response
RT-001	Climate Change and Energy Need	I find this scheme very confused in concept. It destroys a large amount of the very countryside we are trying to protect. The very UK centric approach of solving global warming, seems mad. It leads us to instal massive solar schemes in the uk, where solar isn't particularly efficient. Further it ignores that most of our roofs and car parks don't have solar, which could be used first to provide this type of energy.	Solar energy is at the heart of the Clean Power 2030 Mission (January 2026 revised NPS EN-3, Para 2.10.2) and it is the Government's view that a secure, reliable, affordable, net zero consistent system in 2050 is likely to be composed predominantly of wind and solar (NPS EN-1, Para 3.3.20). Sunlight, the input energy source for solar, is abundant, predictable, renewable, low carbon and free. Figure 16 of the **Statement of Need [APP-266]** and related text (Section 7.4) demonstrates that there are many viable areas of solar irradiation in the UK. Figures 28 and 29 of the Statement of Need and related text (Section 8.5) demonstrate that a multi-technology approach to electricity supply, including solar, can reduce the effects of weather variability on output and is capable of closely matching a future projection of national electricity demand on a month-average level. The inclusion of a Battery Energy Storage System as part of the Scheme will enable energy generated by the Scheme to be stored and exported to the grid when it is needed, which will provide flexibility and improve grid reliability. That other countries may experience higher solar irradiation levels than the UK, means that they too could pursue solar generation to support their climate change plans. However, any such statistic cannot be used to demonstrate that solar in the UK does not work or should not be pursued. Government policy is clear that solar should be pursued in the UK with urgency because of the significant benefits it will bring to the UK energy system, consumers and to help meet UK clean power targets. In relation to suggestions that brownfield land or alternative locations should be used, including rooftop, these matters are addressed in **ES Volume 1, Chapter 4 Alternatives and Design Evolution** and in the **Statement of Need [APP-056 and APP-266]**. The Applicant has considered alternatives, including previously developed land and other forms of solar deployment, as part of the site selection and design evolution process. As

Reference	Theme	Comments/Issues Raised	Applicant's Response
			shown in Table 2-2 of **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]**, the Applicant has considered previously developed land/brownfield land over 1 hectare within the area of search, based on the brownfield land registers of the relevant Local Planning Authorities, and concluded that none of the sites are large enough to provide a viable land parcel of at least 40 ha and sites were not considered to be available as they have planning permission for residential development and/or are allocated for residential/mixed use development. National policy and government guidance, as set out in the **Statement of Need [APP-266]**, recognise that while rooftop and smaller-scale solar installations are an important part of the energy mix, they cannot alone meet the scale of capacity required to achieve clean power and net zero objectives. Large-scale ground-mounted solar therefore remains necessary in addition to, not instead of, rooftop solar.
RT-002	Site selection and Alternatives	The location of this scheme seems confused too. Not only is it very large, but nowhere near the grid connections required some 20 miles away. This means in addition to the impact of the panels the cabling route will be massively disruptive	The Applicant confirms that the existing National Grid Melksham substation has been identified as the point of connection. This decision was based on available capacity, network resilience, and strategic grid planning. As explained in **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]**, an initial search area was identified at a 5 km radius from the POC, however this was later expanded as no suitable and available sites within 5 km were identified. The search area was enlarged incrementally to a 20 km radius which is considered by the Applicant to be a viable cable connection distance for a solar project of this scale. The POC and 20 km search area is shown on Figure 1, Annex C of **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]**. Further, from an operational perspective, high voltage electricity transmission at 400kV in this case, is specifically designed to

Reference	Theme	Comments/Issues Raised	Applicant's Response
			minimise energy losses over long distances. As such, the approximate 20km distance involved results in negligible losses. More details on how the Cable Route Corridor has been located and designed can be found in **ES Volume 1, Chapter 4 Alternatives and Design Evolution [APP-056]**. Several factors were considered designed to take a direct route whilst following existing features, such as roads, and avoiding sensitive receptors as far as practicable, such as habitat designations, residential and commercial properties, heritage assets, and a large number of land interests. The assessments set out in the various chapters of the **ES [APP-052 to APP-265]** detail what impacts are expected as a result of the Scheme based on the minimum and maximum parameters of the Scheme, and the mitigation and enhancement measures that are proposed to reduce these impacts.
RT-003	Socio-Economics, Tourism and Recreation Soils and Agriculture	We farm on the cable route, and this will be a nightmare for our third generation family farm. The farm is surrounded by the cable route and eliminates our home pastures during construction. This means that our rare breed sheep flock would need to be sold and the equestrian business closed down during construction. Something we have spent 20 years building. The house itself would be virtually uninhabitable during construction.	The assessment of effects on agricultural land and farming operations, including temporary land take associated with the cable route, is provided in **ES Volume 1, Chapter 17: Soils and Agriculture [APP-069]**, with detailed construction methodology set out in **ES Volume 3, Appendix 3 2: Cable Route Construction Method Statement [APP-183]**. The cable trench required for installation of underground cables would have a maximum anticipated working width of approximately 7 metres. This equates to a temporary disturbance of approximately 0.07 hectares per hectare of land crossed. Disturbance associated with cable installation would be short term and localised, and following reinstatement, agricultural operations within the affected fields would be able to recommence. Accordingly, land take associated with cable installation would not permanently remove the affected land from agricultural use,

Reference	Theme	Comments/Issues Raised	Applicant's Response
			and the extent and duration of disturbance have been assessed as limited. Loss of agricultural revenue as a result of temporary works to construct the Cable Route Corridor will be managed through negotiations with the affected owners. The Applicant continues to seek voluntary agreement for the acquisition of land and rights, including temporary rights, needed for the implementation of the Cable Route Corridor and the status of ongoing negotiations with affected owners is recorded in the **Land Rights Tracker [APP-021]**. Where there are reasonable and demonstrable damages experienced from the exercising of Project works, appropriate compensation will be available to those entitled under the Compensation Code. The **Funding Statement [APP-019]** confirms that the Applicant has sufficient funds to provide this compensation. The Applicant has assessed the likely impact to the equestrian business at Park Farm in **ES Volume 3 Appendix 16-2 Tourism and Recreation Receptor Tables [APP-241]** as likely to experience a significant adverse effect due to the location of the cable route crossing the business' paddocks. This effect is however temporary, with the land committed to be restored following completion of cable construction works. Similarly, the Applicant acknowledges that the grazing pastures south of Park Farm are directly affected by the routing of the Cable Route Corridor and there will be substantial, albeit temporary disruption to grazing on this land. This disruption to the grazing land can however can be restricted to the width required for cable trenching works and any associated haul route. Where fields have been bisected, working practices around cable laying works should allow for access to be maintained to both sides of the

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Cable Route Corridor to allow for some grazing to be continued even during construction. The **OCEMP [APP-277]** furthermore commits to the reinstatement of land affected by cabling works as soon as practicable to allow for agricultural use of the land to recommence as soon as construction of that section of cable route is complete.
RT-004	Soils and Agriculture	We have solar on our farm roofs already and would do more, but we are prohibited by the grid connection. If the country wants to be green, which I support, use roofs and car parks first and solve the connection issues that mean that much of our existing wind power is wasted	The Applicant notes that this matter has been responded to in detail in the Applicant's responses to this Party above.
RT-005	Site selection and Alternatives	The location is poor and too large. The location requires extensive cabling to connect to the grid which would cause massive extra disruption to thousands of people's lives	The Applicant confirms that the existing National Grid Melksham substation has been identified as the point of connection. This decision was based on available capacity, network resilience, and strategic grid planning. As explained in **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]**, an initial search area was identified at a 5 km radius from the POC, however this was later expanded as no suitable and available sites within 5 km were identified. The search area was enlarged incrementally to a 20 km radius which is considered by the Applicant to be a viable cable connection distance for a solar project of this scale. The POC and 20 km search area is shown on Figure 1, Annex C of **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]**. More details on how the Cable Route Corridor has been located and designed can be found in **ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP-056]**. Several factors were considered designed to take a direct route whilst following existing features, such as roads, and avoiding sensitive receptors as far as practicable, such as habitat designations, residential

Reference	Theme	Comments/Issues Raised	Applicant's Response
			and commercial properties, heritage assets, and a large number of land interests. The construction of the cable route has been assessed throughout the **ES [APP-052 to APP-265]**, which considers the likely significant construction effects associated with these works. The **ES [APP-052 to APP-265]** assesses the cable route within defined parameters, including limits on working width and trench dimensions, to ensure that a reasonable worst-case scenario is assessed. The detailed design and construction of the cable route would be undertaken within the parameters assessed and authorised by the DCO. Measures to manage and minimise construction effects, including reinstatement of land following installation, are set out in the **Outline Construction Environmental Management Plan (CEMP) [APP-277]**. **Requirement 13 in Schedule 2 to the Draft DCO [APP-016]** secures that part of the authorised development can commence until, a CEMP is submitted to and approved by the relevant planning authority. The CEMP must be substantially in accordance with the Outline CEMP, and all construction works associated must be carried out in accordance with the approved CEMP.

6.43 Paul Martin Gatland

Table 6-43 RR-3675

Reference	Theme	Comments/Issues Raised	Applicant's Response
PMG-001	Climate Change and Energy Need	As we approach WWIII I consider it foolish to be replacing farmland with environmentally unfriendly solar farms. The UK has one of richest oil and gas deposits in the world and our government has decided to choose NetZero with the associated poverty for our poorest citizens. I've been a keen observer of Global Warming since 1980 when I wrote my degree dissertation on the subject. None on the United Nations predictions made at the have come true.	Section 2.8 of the **Statement of Need [APP-266]** explains that solar generation provides price protection for GB consumers by shielding them from the effects of volatile international energy markets, including gas. Government's 2025 Carbon Budget and Growth Delivery Plan (available at https://www.gov.uk/government/publications/carbon-budget-and-growth-delivery-plan) explains that "*Around 30% of inflation in 2022, at the peak of the cost-of-living crisis, came directly from rising energy costs as a result of the gas price spike ... reducing the UK's reliance on fossil fuels will protect our economy in the future*".
PMG-002	Description and DCO Process	I strongly object to the new Solar Farm because it is a complete waste of time and money, except for those building it, because they will sell it in a few years for a large profit and the local residents will get nothing.	The Applicant notes the concerns about the reasons behind the Scheme. The Scheme aims to help meet national targets for clean energy and net zero targets set out in legislation and policy. The aim is to deliver long term environmental benefit alongside a secure energy supply. The Applicant recognises that both landowners and the local community are key stakeholders. The Scheme also aims to deliver wider benefits, including biodiversity enhancements, opportunities for local supply chain involvement, and onsite and offsite community benefit initiatives, which will be developed in consultation with local representatives. The Applicant is committed to meeting all planning, environmental, and construction policies and standards. The Scheme is being developed in line with legal and regulatory requirements, with engagement with all statutory and non-statutory bodies, ensuring quality and accountability throughout.

6.44 Rebecca Gay

Table 6-44 RR-3896

Reference	Theme	Comments/Issues Raised	Applicant's Response
RG-001	Transport and Access	I am concerned about the following issues concerning Lime Down Solar Farm and the impact it will have on us and our local community. The volume of lorries on our local country roads and lanes. The volume of employees and all their vehicles during construction. The impact on the local wildlife and their habitats. The level of noise during construction and once the solar farm is up and running. The views of the countryside. The impact on the value of our beautiful family home that we have living restored over a 10 year period. It's heart breaking.	Traffic Impacts The potential effects of construction traffic on the local highway network are assessed in **ES Volume 1, Chapter 13: Transport and Access [APP-065]**, which considers construction vehicle movements, traffic volumes, road safety and effects on road users. This included the capacity of local roads and infrastructure to accommodate construction vehicles with consideration of construction traffic volumes, vehicle types, route suitability, and network performance. The assessment concludes that the level of construction traffic associated with the Scheme is unlikely to materially affect road safety on links within the Study Area, and no significant adverse effects on accident risk are anticipated. The assessment additionally concludes that with appropriate mitigation such as the Construction Traffic Management Plan in place to manage construction vehicle movements, there would be no significant adverse impacts on the local highway network during the construction, operation maintenance, and decommissioning phases of the Scheme. An **Outline Construction Traffic Management Plan (Outline CTMP) [APP-287]** has been prepared and submitted with the DCO application. The aim of the CTMP is to ensure that the effect of the construction phase on the local highway network is minimised. The **Outline CTMP [APP-287]** sets out measures to coordinate construction deliveries by HGVs to arrive and depart between 09:30 and 16:30 where possible, to avoid peak network hours of 08:00–09:00 and 17:00–18:00. It also includes a community liaison element to keep local communities informed about the construction process and to provide a contact for feedback

Reference	Theme	Comments/Issues Raised	Applicant's Response
			should any issues arise. Compliance with the CTMP will be monitored by the Developer, Contractor and Wiltshire Council as local highway authority. The potential effects of operational traffic on the local highway network are assessed in **ES Volume 1, Chapter 13: Transport and Access [APP-065]**. This chapter is supported by **ES Volume 2 Figures,** including **Figure 13-13: Operational Only Access Locations: Solar PV Sites [APP-158]**, and **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]**. The assessment considers day-to-day movements associated with maintenance and security of the Scheme, and for the replacement of Solar PV Panels, Conversion Units and BESS Batteries. Assumptions have been made based on similar projects, and the number of vehicle trips for replacement activities will be less than those during the construction phase. **ES Volume 1, Chapter 13 [APP-060]** concludes that operation and maintenance vehicle types and movements are quantified in this chapter and will not give rise to any residual significant effects, in line with relevant thresholds set out in the ISEP Guidelines 2023. Embedded mitigation measures include providing suitable access points for operation and maintenance phase vehicles with turning areas. Where replacement activities are required, measures set out in the **Outline CTMP [APP-287]** will be implemented as appropriate. In addition, the Outline Public Rights of Way (PRoW) and Permissive Path Management Plan [APP-288] includes measures to manage vehicle interactions with PRoW users and minimise effects on existing users. The preparation, approval, and implementation of the CTMP and the PRoW and Permissive Path Management Plan are secured through Schedule 2, Requirements 15 and 16 respectively, of the

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Draft Development Consent Order [APP-016]. <u>Widlife and habitats</u> Potential impacts on ecology and biodiversity are fully assessed in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**. This assessment considers baseline ecological conditions and evaluates likely significant effects arising during the construction, operation and decommissioning phases of the Scheme. It identifies avoidance, mitigation and enhancement measures to address potential impacts on habitats and protected and notable species. It also identifies opportunities for ecological enhancement, including the creation and long-term management of habitats, and delivery of biodiversity net gain. The assessment concludes that, with the identified embedded and additional mitigation measures in place, no unacceptable significant adverse effects on ecology and biodiversity are anticipated. The Applicant notes that the approach to the assessment in relation to ecology and biodiversity in general is under discussion with Wiltshire Council and Natural England and is set out in the relevant **Statements of Common Ground** to be submitted at Deadline 1. During construction, specific measures are proposed to avoid disturbance and displacement of wildlife. These include protective buffers around sensitive habitats and features, timing restrictions on vegetation clearance, pre-construction ecological surveys, species-specific mitigation, and pollution prevention controls which are set out in the **Outline Ecological Protection and Mitigation Strategy (EPMS) [APP-284]**. Measures to protect trees and hedgerows are also set out in **ES Volume 1, Chapter 10 Arboriculture [APP-062]**. The Scheme will also result in the cessation of intensive arable

Reference	Theme	Comments/Issues Raised	Applicant's Response
			farming within the Solar PV Sites. As identified in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**, this is expected to reduce the ongoing application of herbicides and pesticides, supporting improvements in habitat quality over the operational lifetime of the Scheme. The reversion of existing arable land within the Solar PV Sites to predominantly grassland habitats can be expected to benefit a wide range protected and notable species, as identified in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**. Mitigation and enhancement measures are detailed in the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]** and the **Outline Ecological Protection and Mitigation Strategy (OEPMS) [APP-284]**, which set out habitat creation, species protection measures, buffer zones and long-term ecological management. The preparation, approval and implementation of the detailed Landscape and Ecological Management Plan, substantially in accordance with the **OLEMP [APP-283]**, are secured through Requirement 7 in Schedule 2 of the **Draft Development Consent Order [APP-016]**. The preparation, approval and implementation of the detailed Ecological Protection and Mitigation Strategy, substantially in accordance with the **OEPMS [APP-284]**, are secured through Requirement 8 in Schedule 2 of the **Draft Development Consent Order [APP-016]**. These requirements ensure that ecological protection and enhancement measures are delivered and maintained throughout construction and operation of the Scheme. <u>Noise</u> An assessment of the effects of the Scheme on noise and vibration is provided in **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**, with supporting technical information

Reference	Theme	Comments/Issues Raised	Applicant's Response
			supplied in **ES Volume 3, Appendix 14-4: Noise Modelling [APP-237]**. The assessment considers potential noise and vibration impacts during construction, operation and decommissioning, including from solar PV panels and associated infrastructure. The Applicant notes that the approach to noise and vibration has been discussed with Wiltshire Council, as described in Section 14.2 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**. <u>Construction phase</u> The noise and vibration impacts arising from construction activities are assessed in Section 14.10 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**. For the purposes of the assessment, a reasonable worst-case scenario assuming piling activities has been considered. Mitigation measures associated with construction activity are presented in Section 14.9 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]** and are committed to through the **Outline Construction Environmental Management Plan [APP-277]**. A noise monitoring programme agreed with Wiltshire Council will be carried out during construction. The preparation, approval and implementation of the Construction Environmental Management Plan, substantially in accordance with the **Outline CEMP [APP-277]**, is secured through Requirement 13 in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that construction noise and vibration are appropriately controlled. With these measures in place, the assessment concludes that no significant effects from construction noise or vibration are expected.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Operational phase The noise impacts from the operation of the Scheme and its components are assessed in Section 14.10 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**, with supporting modelling provided in **ES Volume 3, Appendix 14-4: Noise Modelling [APP-237]**. A penalty has been applied to predicted noise levels from the Solar PV Sites to account for the distinctive nature of the sound. Potential mitigation measures are detailed in Section 14.9 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**, and with such measures in place, significant effects from operational noise are not expected. The **Outline Operational Environmental Management Plan [APP-278]** commits to noise levels from the Scheme at residential dwellings being the same as or below those modelled in the ES. This provides assurance that significant effects from operational noise will be avoided, while allowing flexibility in how this is achieved. The preparation, approval and implementation of the detailed OEMP, substantially in accordance with the outline plan, are secured through Requirement 14 of Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring operational noise is appropriately controlled throughout the lifetime of the Scheme. Visual Impact An assessment of landscape and visual effects is provided in the Landscape and Visual Impact Assessment (LVIA) presented in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**. The LVIA assesses effects on identified landscape and visual receptors, including residential properties and users of public

Reference	Theme	Comments/Issues Raised	Applicant's Response
			rights of way, and identifies where significant effects may occur. The LVIA found no significant long term visual effects to Residential Properties as a consequence of the Scheme. The scale of development within the Order Limits has been significantly reduced from the layout assessed in the Preliminary Environmental Information Report (PEIR) through an iterative design process undertaken in response to consultation and in accordance with the mitigation hierarchy to avoid, reduce and mitigate adverse effects. As part of this design evolution, panels along the edge of the Cotswolds National Landscape and along the Fosse Way have been removed. Mitigation measures to address landscape and visual effects are set out in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**, Figure 3-4-1 to 3-4-5.2 **Landscape and Ecology Mitigation Plan [APP-084]** and detailed within the **Outline Landscape and Ecological Mitigation Plan (LEMP) [APP-283]** and the **Outline Ecological Protection and Mitigation Strategy (EPMS) [APP-284]**. These documents include proposals for new and enhanced planting, retention of existing hedgerows and woodland, and landscape integration measures to reduce visual effects over time. In addition, the Scheme design incorporates minimum offsets from existing landscape features, including residential properties, ancient woodland, woodland, hedgerows, public rights of way and watercourses, to further limit visual impacts. The preparation, approval and implementation of detailed landscape and ecological management plans, substantially in accordance with the **OLEMP [APP-283]** and **EPMS [APP-284]**, are secured through requirements in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that the

Reference	Theme	Comments/Issues Raised	Applicant's Response
			identified mitigation measures are delivered and maintained throughout the lifetime of the Scheme. Impacts of the Scheme on property prices have not been assessed as these have been agreed by the Planning Inspectorate to be scoped out of assessment in the ES, as set out in **ES Volume 3, Appendix 1-2: Scoping Opinion Response Table [APP-181]**.

6.45 Philip Miles

Table 6-45 RR-3794

Reference	Theme	Comments/Issues Raised	Applicant's Response
PM-001	Other Environmental Matters	There may be electrical interference from inverters, motors, and switch gear affecting TV and communications.	The effects of electromagnetic fields (EMF) arising from the Scheme are assessed in Section 20:6: Electromagnetic Fields of **ES Volume 1, Chapter 20: Other Environmental Matters [APP-072]**. The assessment considers EMF emissions from the Scheme's electrical infrastructure and evaluates potential effects on surrounding receptors. The assessment concludes that no significant impacts are likely to occur as a result of any of the Scheme's infrastructure. It also confirms that predicted EMF levels are below the reference levels set by the International Commission on Non-Ionizing Radiation Protection.
PM-002	Ecology and Biodiversity	Environmental Damage. My water supply is from a borehole. There is no guarantee that it will not be affected by pollutants from panel installation, cleaning, and the result of a fire in the BESS and other units.	The Applicant acknowledges the concern regarding private borehole water supply. The hydrology and water environment assessment considers groundwater receptors and pollution pathways and does not identify a credible mechanism by which installation or operation of solar PV panels would pollute groundwater or affect private water supplies. National policy recognises that ground-mounted solar PV generally drains to ground and does not create significant drainage impacts where ground cover is maintained (NPS EN-3 paragraph 3.10.75). **ES Volume 1, Chapter 11 Hydrology, Flood Risk and Drainage [APP-063]**. Construction-phase pollution prevention, including control of fuels, oils, sediment and concrete, is secured through the construction management framework, with incident response measures in place to avoid pollution of controlled waters. **Outline Construction Environmental Management Plan [APP-277]**. In relation to BESS fire scenarios, firefighting water and any potentially contaminated runoff would be contained within sealed and controlled drainage systems associated with the BESS, with isolation and containment measures secured through the battery safety and drainage controls to prevent uncontrolled release to ground or watercourses. **Outline Battery Safety Management**

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Plan [APP-286]. No amendments to the application documents are required.
PM-003	Ecology and Biodiversity	Biodiversity. Covering farmland with panels etc. and putting a cage around them is going to reduce the wildlife population and prevent Deer, foxes, badgers from free movement between areas.	Potential effects of boundary treatments and fencing on ecology and wildlife movement are assessed in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**, which considers impacts on habitats and species during construction, operation and decommissioning and identifies measures to avoid or mitigate barriers to wildlife movement. The Scheme design incorporates fencing around the Solar PV Arrays that is permeable to wildlife, with the exception of deer. This means animals (excluding deer only) will be able to freely access habitats within the Solar PV Sites without the need for wildlife gates. In addition, wide buffers are retained around the peripheries of the Solar PV Sites to allow wildlife, including deer, to move between favoured habitats. These measures are described in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]** and detailed in the **Outline Ecological Protection and Mitigation Strategy (OEPMS) [APP-284]**. Fencing will be subject to regular inspection and maintenance to ensure continued permeability to wildlife and effective functioning over the lifetime of the Scheme. Measures for ongoing ecological management and maintenance are set out in the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]**. The preparation, approval and implementation of the detailed Ecological Protection and Mitigation Strategy and Landscape and Ecological Management Plan, substantially in accordance with the O**EPMS [APP-284]** and **OLEMP [APP-283]**, are secured through Requirements 8 and 7 respectively in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that fencing design and maintenance measures are delivered and maintained throughout the lifetime of the Scheme.

Reference	Theme	Comments/Issues Raised	Applicant's Response
PM-004	Soils and Agriculture	Loss of farmland will affect our country's ability to provide food for itself.	The potential effects of the Scheme on agricultural land are assessed in **ES Volume 1, Chapter 17 Soils and Agriculture [APP-069]**, which considers baseline agricultural land use and quality and evaluates likely effects during construction, operation and decommissioning. The assessment confirms that the Scheme will result in a temporary and reversible loss of agricultural land during the operational period, with all land to be returned to its original use and condition as far as practicable following decommissioning. No permanent loss of agricultural land is anticipated. The Applicant does not consider that food security will be compromised by the Scheme (or solar energy more widely). The latest figures to September 2024 indicate that solar occupied around 21,200 ha of agricultural land in the UK. In 2025, 545,000 ha of arable land in England were left uncropped (source: Department for Environment, Food & Rural Affairs, Agricultural land use in England at 1 June 2025). It should also be noted that food security is not identified as an issue within the suite of Energy National Policy Statements or the National Planning Policy Framework (NPPF). Further, the Government's UK Solar Roadmap (2025) states that solar development is not considered to compromise food security, but that the climate and nature crisis poses the greatest long-term risk to food security- a risk which the Scheme directly helps to address by providing a secure, low-carbon source of electricity. As set out in Section 2 of the **Outline Decommissioning Strategy [APP-279],** post-decommissioning of the Scheme, the landowners would choose how the land is to be used and managed. The landowner may return all of the land to arable use, although it is likely that established habitats such as hedgerows and woodland would be retained given their potential

Reference	Theme	Comments/Issues Raised	Applicant's Response
			benefits to agricultural land and the wider farming estate. Post-decommissioning of the Scheme, the landowners would choose how the land is to be used and managed, the landowner may return all of the land to arable use, although it is likely that established habitats such as hedgerows and woodland would be retained given their potential benefits to agricultural land and the wider farming estate. a national scale and has therefore not been assessed.
PM-005	Transport and Access	Construction Traffic Causing more damage to already potholed roads, and verges. More accidents and disruption from multitudes of HGV's in competition with cyclists, walkers, and motorists who normally peacefully use the area.	The effects of construction traffic on the local highway network are assessed in **ES Volume 1, Chapter 13: Transport and Access [APP-065]**, which considers construction vehicle routing, traffic volumes and potential impacts on highway safety and road condition. The assessment concludes that, with appropriate management measures in place, construction traffic effects can be appropriately controlled. Mitigation measures to manage construction traffic and protect local roads are set out in the **Outline Construction Traffic Management Plan (Outline CTMP) [APP-287]**. The CTMP has been developed to minimise impacts on the local highway network and includes measures for routing, scheduling of deliveries and liaison with the local highway authority. A road condition and dilapidation survey of minor roads not typically used by HGV traffic is included as a measure within the CTMP. Any damage to verges or carriageway surfaces caused by construction vehicles will be rectified to the satisfaction of the local highway authority. The preparation, approval and implementation of the final CTMP, substantially in accordance with the outline CTMP, are secured through Requirement 15 of Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring construction traffic impacts, including potential damage to local roads, are

Reference	Theme	Comments/Issues Raised	Applicant's Response
			appropriately managed throughout the construction phase of the Scheme. The potential effects of construction traffic on highway safety and accident risk are assessed in **ES Volume 1, Chapter 13: Transport and Access [APP-065]**, which considers changes in traffic flows, HGV movements and accident risk on the local road network. Links experiencing traffic increases above defined assessment thresholds were taken forward for detailed analysis. Supporting technical evidence is provided in **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]**, which includes an assessment of baseline accident data and predicted changes in collision risk arising from construction traffic. The assessment concludes that the level of construction traffic associated with the Scheme is unlikely to materially affect road safety on links within the Study Area, and no significant adverse effects on accident risk are anticipated. Mitigation measures to manage construction traffic safely are set out in the **Outline CTMP [APP-287]**, which includes defined vehicle routing, delivery scheduling and coordination with the local highway authority. The preparation, approval and implementation of the final CTMP, substantially in accordance with the outline CTMP, are secured through Requirement 15 of Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring construction traffic is managed safely throughout the construction phase of the Scheme
PM-006	Transport and Access	Emergency vehicle response times will be slowed and possibly put lives and property in danger.	The BESS site is located within a seven minute journey of the Strategic Road Network and is accessible to emergency vehicles. A separate emergency access to the BESS site is also

Reference	Theme	Comments/Issues Raised	Applicant's Response
			provided in accordance with guidance set out by the National Fire Chiefs Council.
PM-007	Socio-Economics, Tourism and Recreation Human Health	This Development will seriously affect my life: Visually I will be looking out of my home at fields of grotesque panels instead of open countryside. Devaluing my property. It will affect my mental health both during construction and operation.	Impacts of the Scheme on property prices have not been assessed as these have been agreed by the Planning Inspectorate to be scoped out of assessment in the ES, as set out in **ES Volume 3, Appendix 1-2: Scoping Opinion Response Table [APP-181]**. Impacts on mental health and wellbeing are assessed in **ES Volume 1, Chapter 18: Human Health [APP-070]**. This chapter provides a comprehensive assessment of the Scheme's potential effects on human health, including mental health and wellbeing, through consideration of a broad range of health determinants. These include access to open space and recreation, transport and connectivity, community identity and cohesion, employment and income, noise and vibration, air quality, and access to health and social care services. The assessment applies a health "*lens*" to the findings of relevant technical chapters and concludes that, with embedded mitigation and additional measures secured, the Scheme would not give rise to significant adverse effects on population health, including mental health and wellbeing. The assessment focuses on communities within a 2 km Study Area surrounding the Scheme, identified as those most likely to experience potential health-related effects. Baseline analysis demonstrates that rates of poor mental health within the Study Area are generally lower than national averages, and the assessment considers potential pathways by which the Scheme could influence mental wellbeing, including changes to environment, amenity, access and community factors. Residual effects following mitigation are assessed as not significant at any phase of the Scheme. Consultation with Wiltshire Council's Public Health Team has informed the approach to mental health considerations, as

Reference	Theme	Comments/Issues Raised	Applicant's Response
			documented in **ES Volume 3, Appendix 18-1: Human Health Consultation [APP-244]**. Through this engagement, the Applicant has committed to signposting locally available mental health and wellbeing resources to members of the public engaging with the Scheme, using information provided by Wiltshire Council's Public Health Team. The Applicant will continue to monitor consultation responses relating to mental health and will provide appropriate signposting to existing local support services where requested. The Applicant notes that the assessment methodology for health and wellbeing has been agreed with Wiltshire Council's Public Health team and is set out in the Statement of Common Ground with Wiltshire Council to be submitted at Deadline 1. Grain Store Barn is identified as receptor RG020 and has been fully assessed in **ES Volume 3, Appendix 8-3-2-2: Landscape and Visual Assessment Sheets (Significant) [APP-191]**. The assessment recognises that there would be Major/Moderate Adverse effects which are Significant during Construction and Year 1. The assessment notes: The scheme has been designed to accommodate these residential properties, and infrastructure has been set back to allow separation and space for mitigation. Views of construction activity would be visible in open views across the surrounding fields, where visible, this would be set back from the properties by at least 150m. There is no proposed infrastructure within field C16 and open views are maintained to the south. The level of change in views would be High. Proposed mitigation includes reinforced roadside screening, new sections of hedgerow, hedgerow reinforcement and enhancement is proposed throughout the surrounding Site. Although this would have a limited effect initially, by Year 15 mitigation planting would filter views of the proposed infrastructure and reduce visibility of the Scheme reducing the effect to Moderate/ Minor adverse which is non-significant.

Reference	Theme	Comments/Issues Raised	Applicant's Response
PM-008	Noise and Vibration	The peace and tranquility will be shattered by noise. (a) From construction (b) From operation, where the noise figures from the developer are an optimistic guess.	The noise and vibration impacts arising from construction activities are assessed in Section 14.10 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**. Mitigation measures are committed to through the **Outline Construction Environmental Management Plan [APP-277]**. As a reasonable worst-case this assessment includes the noise from piling rigs that will be larger and louder than those used in practice. With these measures in place, the assessment concludes that daily noise exposure levels would not breach significant effect thresholds. Piling associated with the closest solar PV panels will be audible at Grain Store Barn but will be relatively short-lived in comparison to the overall construction programme. A noise monitoring programme agreed with Wiltshire Council will be carried out during construction. The noise impacts from the operation of the Scheme and its components are assessed in Section 14.10 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**. As shown in Table 8 of **ES Volume 3, Appendix 14-4: Noise Modelling [APP-237]**, noise levels from the Scheme at Grain Store Barn, which would be primarily from the BESS facility, would typically be around the existing background sound in the area. The levels have been calculated, using the appropriate international standard, on a worst-case assumption that wind is blowing from the source of the noise to the receptor locations, as stated in paragraph 14.4.15 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**. The **Outline Operational Environmental Management Plan [APP-278]** commits to noise levels from the Scheme at residential dwellings being the same as or below those modelled in the ES. This provides assurance that significant effects from operational noise will be avoided, while allowing flexibility in how this is achieved.

6.46 Gillian Miles

Table 6-46 RR-1675

Reference	Theme	Comments/Issues Raised	Applicant's Response
GM-001	Other Environmental Matters Noise and Vibration	The Lime Down Project will have a massive impact on my life for someone who has retired from work, and spends considerable time at home. My concerns are:- Visually - The large solar panels that will border and surround my home, with the loss of green fields and extended views. The glint and glare effect from the panels. *Hearing - The noise from the moving panels. The 'Hum' from the Battery Storage that is proposed to be located nearby.	Grain Store Barn is identified as receptor RG020 and has been fully assessed in **ES Volume 3, Appendix 8-3-2-2: Landscape and Visual Assessment Sheets (Significant) [APP-191]**. The assessment recognises that there would be Major/Moderate Adverse effects which are Significant during Construction and Year 1. The assessment notes: The scheme has been designed to accommodate these residential properties, and infrastructure has been set back to allow separation and space for mitigation. Views of construction activity would be visible in open views across the surrounding fields, where visible, this would be set back from the properties by at least 150m. There is no proposed infrastructure within field C16 and open views are maintained to the south. The level of change in views would be High. Proposed mitigation includes reinforced roadside screening, new sections of hedgerow, hedgerow reinforcement and enhancement is proposed throughout the surrounding Site. Although this would have a limited effect initially, by Year 15 mitigation planting would filter views of the proposed infrastructure and reduce visibility of the Scheme reducing the effect to Moderate/ Minor adverse which is non-significant.
GM-002	Human Health Transport and Access	Mentally - Safety concerns from the huge Battery Storage. e.g.potential uncontrollable fire, pollution from damaged batteries. Concerns that Emergency Services will be unable to gain access quickly, due to narrow roads and potential lack of resources.	The BESS site is located within a seven minute journey of the Strategic Road Network and is accessible to emergency vehicles. A separate emergency access to the BESS site is also provided in accordance with guidance set out by the National Fire Chiefs Council.
GM-003	Ecology and Biodiversity	Loss of peace and tranquility, wild life Loss of countryside walks	A detailed assessment of the likely significance of effects from the Scheme on the use and desirability of individual PRoWs and recreational access to the countryside is included in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** and **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]**. This assessment

Reference	Theme	Comments/Issues Raised	Applicant's Response
			considers the impact on individual recreational routes, including their practical use, enjoyment and desirability. The assessment in **ES Volume 1, Chapter 18: Human Health [APP-070]** goes on to assess the physical and mental health impacts of changes to recreation and countryside access under the assessment topic 'open space, leisure and play', finding that no significant adverse effects are anticipated at any phase of the Scheme. The Applicant notes that the approach to recreation and access to the countryside has been agreed with Wiltshire Council's Public Health team and is under discussion with Wiltshire Council's Countryside Access Team. This is set out in the Statement of Common Ground with Wiltshire Council to be submitted at Deadline 1. Potential impacts on ecology and biodiversity are fully assessed in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**. This assessment considers baseline ecological conditions and evaluates likely significant effects arising during the construction, operation and decommissioning phases of the Scheme. It identifies avoidance, mitigation and enhancement measures to address potential impacts on habitats and protected and notable species. It also identifies opportunities for ecological enhancement, including the creation and long-term management of habitats, and delivery of biodiversity net gain. The assessment concludes that, with the identified embedded and additional mitigation measures in place, no unacceptable significant adverse effects on ecology and biodiversity are anticipated. The Applicant notes that the approach to the assessment in relation to ecology and biodiversity in general is under discussion with Wiltshire Council and Natural England and is set out in the relevant Statements of Common Ground to be submitted at

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Deadline 1. During construction, specific measures are proposed to avoid disturbance and displacement of wildlife. These include protective buffers around sensitive habitats and features, timing restrictions on vegetation clearance, pre-construction ecological surveys, species-specific mitigation, and pollution prevention controls which are set out in the **Outline Ecological Protection and Mitigation Strategy (OEPMS) [APP-284]**. Measures to protect trees and hedgerows are also set out in **ES Volume 1, Chapter 10 Arboriculture [APP-062]**. The Scheme will also result in the cessation of intensive arable farming within the Solar PV Sites. As identified in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**, this is expected to reduce the ongoing application of herbicides and pesticides, supporting improvements in habitat quality over the operational lifetime of the Scheme. The reversion of existing arable land within the Solar PV Sites to predominantly grassland habitats can be expected to benefit a wide range protected and notable species, as identified in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**. Mitigation and enhancement measures are detailed in the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]** and the **OEPMS [APP-284]**, which set out habitat creation, species protection measures, buffer zones and long-term ecological management. The preparation, approval and implementation of the detailed Landscape and Ecological Management Plan, substantially in accordance with the **OLEMP [APP-283]**, are secured through Requirement 7 in Schedule 2 of the **Draft Development Consent Order [APP-016]**. The preparation, approval and implementation of the detailed Ecological Protection and

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Mitigation Strategy, substantially in accordance with the **OEPMS [APP-284]**, are secured through Requirement 8 in Schedule 2 of the **Draft Development Consent Order [APP-016]**. These requirements ensure that ecological protection and enhancement measures are delivered and maintained throughout construction and operation of the Scheme
GM-004	Hydrology, Flood Risk and Drainage	Concerns re:- water contamination to bore hole which supplies water to our property.	The Applicant acknowledges the concern regarding private borehole water supply. The hydrology and water environment assessment considers groundwater receptors and pollution pathways and does not identify a credible mechanism by which the installation or operation of solar PV infrastructure would contaminate groundwater or affect borehole water quality. Construction-phase pollution prevention and incident response measures are secured to avoid adverse effects on controlled waters. **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [APP-063]** and **Outline Construction Environmental Management Plan [APP-277]**.
GM-005	Socio-Economics, Tourism and Recreation Landscape and Visual	*Financial - Extreme impact on property value. Location now open fields with extensive views to an Industrial Solar Site!	Impacts of the Scheme on property prices have not been assessed as these have been agreed by the Planning Inspectorate to be scoped out of assessment in the ES, as set out in **ES Volume 3, Appendix 1-2: Scoping Opinion Response Table [APP-181]**. The Applicant notes that visual impact has been addressed in detail in the Applicant's responses to this Party above.
GM-006	Noise and Vibration	*Building Process - Extreme piercing noise from drilling next to property.	The noise and vibration impacts arising from construction activities are assessed in Section 14.10 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**. Mitigation measures are committed to through the **Outline Construction Environmental Management Plan (Outline CEMP) [APP-277]**. In particular, as presented in Table 14-18 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**, average levels at Grain Store Barn are expected to be around 58 dB which while audible is well below levels likely to give rise to significant adverse effects on health or quality of life. Additionally, noise

Reference	Theme	Comments/Issues Raised	Applicant's Response
			from the installation of solar PV panels will be spread across the site over the course of the construction period and therefore will only be at the levels presented in Table 14-18 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]** for the closest set of works. As a reasonable worst-case this assessment includes the noise from piling rigs that will be larger and louder than those used in practice. A noise monitoring programme agreed with Wiltshire Council will be carried out during construction. The preparation, approval and implementation of the Construction Environmental Management Plan, substantially in accordance with the **Outline CEMP [APP-277]**, is secured through Requirement 13 in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that construction noise and vibration are appropriately controlled. With these measures in place, the assessment concludes that no significant effects from construction noise or vibration are expected.
GM-007	Transport and Access	Traffic and large earth moving vehicles surrounding property.	The applicant make note of this comment.
GM-008	Landscape and Visual	Total destruction to land.	The Applicant is confident that the proposed management and mitigation measures set out in the **ES [APP-052 to APP-265]** are comprehensive and robust and that the Scheme aligns with national and local planning policy; this is outlined in the **Planning Statement [APP-267]**. Of particular relevance are Annex A: National Policy Statement Accordance Tables and Annex B: Local Policy Accordance Tables, of the Planning Statement which set out an appraisal of the Scheme against the policies.

6.47 Paul Gregory

Table 6-47 RR-3652

Reference	Theme	Comments/Issues Raised	Applicant's Response
PGY-001	Soils and Agriculture	Agricultural land is needed. Have NEVER seen a solar site being used with any form of farming. WE NEED FARMS. Why are we building housing without solar panel roofs.	An assessment of the potential effects of the Scheme on soils and agricultural land is provided in **ES Volume 1, Chapter 17 Soils and Agriculture [APP-069]**. This chapter considers baseline agricultural land quality, including Best and Most Versatile (BMV) land, and assesses likely significant effects arising from construction, operation and decommissioning of the Scheme, together with embedded mitigation measures. The areas of each Agricultural Land Classification (ALC) grade affected by the Scheme are set out in Section 17.7 of **ES Volume 1, Chapter 17: Soils and Agriculture [APP-069]**. Of the agricultural land within the Solar PV Sites, approximately 477.4 hectares (around 67%) is classified as Subgrade 3b or Grade 4 and is therefore not BMV land. There is no Grade 1 land, around 30.8 hectares (approximately 4%) of Grade 2 land, and approximately 209.3 hectares (around 29%) of Subgrade 3a land. The distribution of ALC grades is shown in **ES Volume 2, Figure 17-2: Agricultural Land Classification Mapping [APP-172]**. The Applicant has had regard to agricultural land quality in the design and site selection process and has sought, where practicable, to locate infrastructure on lower quality land. The Scheme will result in a temporary but long-term and reversible loss of agricultural land for the operational life of the Scheme. As set out in Section 17.10 of **ES Volume 1, Chapter 17: Soils and Agriculture [APP-069]**, this gives rise to a temporary, long-term moderate adverse effect on agricultural land overall, and a temporary, long-term major/moderate adverse effect on BMV land, both of which are assessed as significant. These effects are fully reported in the ES and are a matter for the Secretary of State to weigh in the planning balance against the need for the Scheme and its wider benefits. There are no significant permanent effects on agricultural land, as all land will be returned to its original use and condition as far as practicable following decommissioning.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			The Applicant notes that the approach to assessing the quality of the agricultural land is under further discussion with Natural England and is set out in the relevant Statement of Common Ground to be submitted at Deadline 1. Measures to avoid and minimise effects on soils and agricultural land are embedded within the Scheme design and secured through the DCO. These include the preparation and implementation of a **Soil Resources Management Plan (SRMP) [APP-280]**, which will control soil handling, storage and reinstatement during construction, operation and decommissioning, and a requirement to prepare and implement a Decommissioning Strategy in accordance with the **Outline Decommissioning Strategy [APP-279]**. Through the establishment and maintenance of long-term grassland beneath and between the solar arrays, soil health, quality and structure are anticipated to improve over the lifetime of the Scheme, resulting in a temporary, moderate beneficial effect on soil resources at decommissioning, which is assessed as significant (Sections 17.10 and 17.12 of **ES Volume 1, Chapter 17: Soils and Agriculture [APP-069]**). In relation to suggestions that brownfield land or alternative locations should be used, including rooftop, these matters are addressed in **ES Volume 1, Chapter 4 Alternatives and Design Evolution** and in the **Statement of Need [APP-056 and APP-266]**. The Applicant has considered alternatives, including previously developed land and other forms of solar deployment, as part of the site selection and design evolution process. As shown in Table 2-2 of **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]**, the Applicant has considered previously developed land/brownfield land over 1 hectare within the area of search, based on the brownfield land

Reference	Theme	Comments/Issues Raised	Applicant's Response
			registers of the relevant Local Planning Authorities, and concluded that none of the sites are large enough to provide a viable land parcel of at least 40 ha and sites were not considered to be available as they have planning permission for residential development and/or are allocated for residential/mixed use development. National policy and government guidance, as set out in the **Statement of Need [APP-266]**, recognise that while rooftop and smaller-scale solar installations are an important part of the energy mix, they cannot alone meet the scale of capacity required to achieve clean power and net zero objectives. Large-scale ground-mounted solar therefore remains necessary in addition to, not instead of, rooftop solar.

6.48 Tamsyn Attiwell

Table 6-48 RR-4617

Reference	Theme	Comments/Issues Raised	Applicant's Response
TA-001	Socio-Economics, Tourism and Recreation	I live on (Redacted), a designated Wiltshire Cycle Route set within an Area of Outstanding Natural Beauty and forming part of the historic landscape linked to the Roman Fosse Way. The Lime Down Solar Project will have a substantial and lasting impact on my daily life, my property, and the wider Grittleton community. During the construction phase, all residents along (Redacted) will experience a significant loss of amenities and local environmental quality.	The Applicant has responded to the matters raised in this Relevant Representation in detail below.
TA-002	Hydrology, Flood Risk and Drainage	The area already suffers from recognised flooding issues, and the proposed works are likely to increase this risk. The project documentation provides no credible flood alleviation measures, and without these, additional surface-water runoff and ground disturbance could directly affect water sources, properties, and highways. As a parent, I am extremely concerned about the resulting safety risks for my children, particularly during winter months when flooding is already at its highest.	The Applicant acknowledges that flooding occurs in the area under existing baseline conditions. The flood risk assessment has been undertaken in accordance with national and local policy and concludes that the Scheme would not increase flood risk elsewhere, including during construction. The assessment considers surface water, fluvial and construction-phase mechanisms and is supported by embedded mitigation secured through the DCO discharge process. **ES Volume 1, Chapter 11 Hydrology, Flood Risk and Drainage [APP-063]**.
TA-003	Transport and Access	The local road network is not suitable for the level of construction traffic predicted. (Redacted) and the Grittleton crossroads are narrow, historic lanes with limited visibility and restricted passing points. The anticipated traffic	An assessment of the effects of construction activities on air quality is provided in **ES Volume 1, Chapter 15: Air Quality [APP-067]**. The assessment considers potential emissions from construction dust, construction vehicle exhausts and Non-Road Mobile Machinery (NRMM), and has been undertaken in accordance with relevant best practice guidance. Further detail

Reference	Theme	Comments/Issues Raised	Applicant's Response
		levels-"*104 HGV movements, 24 bus trips, and 334 car trips per day*-"will fundamentally alter the safety, noise levels, and air quality outside my front door for the duration of the project. Working from home will become extremely difficult, and the increased pollution from idling or slow-moving construction vehicles creates clear health concerns for my household. These impacts will not be temporary inconveniences; they will affect my daily life, my ability to work, and the wellbeing of my family.	on the construction dust assessment is provided in **ES Volume 3, Appendix 15-1: Construction Dust Methodology and Assessment [APP-238]**. The assessment concludes that, with embedded mitigation measures in place, construction-phase air quality effects would not be significant. Mitigation measures to control dust and emissions during construction are set out in the **Outline Construction Environmental Management Plan [APP-277]** and the **Outline Construction Traffic Management Plan [APP-287]**. These include measures such as dust suppression, site management controls, routing and scheduling of construction traffic, and management of plant and machinery. The preparation, approval and implementation of detailed construction management plans, substantially in accordance with the outline plans, are secured through Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that air quality impacts during construction are appropriately controlled.
TA-004	Socio-Economics, Tourism and Recreation	I have lived in Grittleton for 25 years and have been actively involved in supporting and improving our rural community. I helped develop the Multi-Use Games Area (MUGA), a facility we built collectively to create local sports opportunities. I was proud to represent our parish as part of the Olympic Torch relay in recognition of this achievement. The proposed cable route for this development will directly damage or destroy the MUGA, leaving the community without essential facilities	The Village Hall at Grittleton has been assessed as a specific recreational receptor in **ES Volume 3 Appendix 16-2 Tourism and Recreation Receptor Tables [APP-241]**. This identifies that during construction, a residual medium-term temporary moderate-minor adverse effect is anticipated to users of these facilities. This is not a significant effect, subject to the implementation of additional mitigation measures to control HGV movements to and from the construction compound. These measures are set out in the **OCTMP [APP-287]**, secured by Requirement 15 in Schedule 2 to the **Draft DCO [APP-016]**. The Applicant has responded in full to the comments made by the Grittleton, Sevington and Leigh Delamere Village Hall and

Reference	Theme	Comments/Issues Raised	Applicant's Response
		and creating a financial deficit of £50,000-"the amount we collectively raised to build it. This represents not only the loss of a physical asset but the loss of a community effort that brought people together and significantly enhanced local wellbeing.	Recreation Ground in their Relevant Representation [RR-1743] above.
TA-005	Cumulative Effects Ecology and Biodiversity Transport and Access	The cumulative effects of environmental disruption, increased flooding risk, heavy construction traffic, loss of community facilities, and long-term damage to a nationally recognised landscape will have a profound impact on me personally and on the fabric of Grittleton. These issues cannot be dismissed as minor or temporary; they will affect the health, safety, daily routines, and social cohesion of residents for years to come. For these reasons, I urge the decision-makers to fully consider the significant and long-lasting personal and community impacts of the Lime Down Solar Project as currently proposed.	An intra- project effects assessment has been undertaken whereby all overlapping effects across all technical disciplines are considered to determine where effects in one discipline (such as glint and glare) together with effects from another discipline (such as noise) could combine to generate a significant effect. The **In-Combination Effects Matrix [APP-264]** sets out all receptors and technical disciplines considered. The assessment is then reported in Table 21-6 and Table 21-7 of **ES Volume 1, Chapter 21 In-Combination and Cumulative Effects [APP-073]**. With implementation of the secured management and mitigation measures, effect interactions do not increase the significance of effects identified in the Environmental Statement

6.49 Janice Parker

Table 6-49 RR-2178

Reference	Theme	Comments/Issues Raised	Applicant's Response
JP-001	Ecology and Biodiversity	My main concern is the impact on nature and the disregard for anything other than 'progress' for the human race.	Potential impacts on ecology and biodiversity are fully assessed in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**. This assessment considers baseline ecological conditions and evaluates likely significant effects arising during the construction, operation and decommissioning phases of the Scheme. It identifies avoidance, mitigation and enhancement measures to address potential impacts on habitats and protected and notable species. It also identifies opportunities for ecological enhancement, including the creation and long-term management of habitats, and delivery of biodiversity net gain. The assessment concludes that, with the identified embedded and additional mitigation measures in place, no unacceptable significant adverse effects on ecology and biodiversity are anticipated. The Applicant notes that the approach to the assessment in relation to ecology and biodiversity in general is under discussion with Wiltshire Council and Natural England and is set out in the relevant Statements of Common Ground to be submitted at Deadline 1. During construction, specific measures are proposed to avoid disturbance and displacement of wildlife. These include protective buffers around sensitive habitats and features, timing restrictions on vegetation clearance, pre-construction ecological surveys, species-specific mitigation, and pollution prevention controls which are set out in the **Outline Ecological Protection and Mitigation Strategy (OEPMS) [APP-284]**. Measures to protect trees and hedgerows are also set out in **ES Volume 1, Chapter 10 Arboriculture [APP-062]**. The Scheme will also result in the cessation of intensive arable farming within the Solar PV Sites. As identified in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**, this is expected to reduce the ongoing application of herbicides and pesticides, supporting improvements in habitat quality over the

Reference	Theme	Comments/Issues Raised	Applicant's Response
			operational lifetime of the Scheme. The reversion of existing arable land within the Solar PV Sites to predominantly grassland habitats can be expected to benefit a wide range protected and notable species, as identified in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**. Mitigation and enhancement measures are detailed in the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]** and the **OEPMS [APP-284]**, which set out habitat creation, species protection measures, buffer zones and long-term ecological management. The preparation, approval and implementation of the detailed Landscape and Ecological Management Plan, substantially in accordance with the **OLEMP [APP-283]**, are secured through Requirement 7 in Schedule 2 of the **Draft Development Consent Order [APP-016]**. The preparation, approval and implementation of the detailed Ecological Protection and Mitigation Strategy, substantially in accordance with the **OEPMS [APP-284]**, are secured through Requirement 8 in Schedule 2 of the **Draft Development Consent Order [APP-016]**. These requirements ensure that ecological protection and enhancement measures are delivered and maintained throughout construction and operation of the Scheme.

6.50 Stephen Booty

Table 6-50 RR-4455

Reference	Theme	Comments/Issues Raised	Applicant's Response
SBY-001	Hydrology, Flood Risk and Drainage	I live in the area of concern. I currently experience significant flooding both in my fields and in one of my cottages - where in periods of heavy rainfall water floods up through the floor. The significant amount of concrete used in this installation and the concentrated run off from the panels this will hugely increase the damage caused by water.	The Applicant acknowledges the experience of flooding affecting land and property. The Scheme is designed such that it would not increase flood risk elsewhere. The assessment, provided in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [APP-063]**, distinguishes between panelled areas, where rainfall drains to ground beneath and between panels, and limited areas of hardstanding associated with supporting electrical infrastructure, where engineered and controlled drainage is provided. National policy recognises that ground-mounted solar PV generally drains to ground and does not create significant drainage impacts where ground cover is maintained (NPS EN-3 paragraph 3.10.75).
SBY-002	Ecology and Biodiversity Landscape and Visual	Additionally the loss of all the natural habitats and agricultural land will destroy the area for generations. Destroying food producing land and amenity land forever. The narrow road infrastructure will not cope - it does not cope now. As a farm owner i applied to have solar installed on my barn roofs but i was extremely surprised to have been refused permission ! How can it be that the use of existing roof space is refused but the destruction of rural land and landscapes is allowed ? The permanent loss of such a scenic and productive rural area to an industrial scale development will destroy the communities within this development forever.	Potential impacts on ecology and biodiversity are fully assessed in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**. This assessment considers baseline ecological conditions and evaluates likely significant effects arising during the construction, operation and decommissioning phases of the Scheme. It identifies avoidance, mitigation and enhancement measures to address potential impacts on habitats and protected and notable species. It also identifies opportunities for ecological enhancement, including the creation and long-term management of habitats, and delivery of biodiversity net gain. The assessment concludes that, with the identified embedded and additional mitigation measures in place, no unacceptable significant adverse effects on ecology and biodiversity are anticipated. The Applicant notes that the approach to the assessment in relation to ecology and biodiversity in general is under discussion with Wiltshire Council and Natural England and is set out in the relevant **Statements of Common Ground** to be submitted at Deadline 1. During construction, specific measures are proposed to avoid disturbance and displacement of wildlife. These include protective buffers around sensitive habitats and features, timing

Reference	Theme	Comments/Issues Raised	Applicant's Response
			restrictions on vegetation clearance, pre-construction ecological surveys, species-specific mitigation, and pollution prevention controls which are set out in the **Outline Ecological Protection and Mitigation Strategy (EPMS) [APP-284]**. Measures to protect trees and hedgerows are also set out in **ES Volume 1, Chapter 10 Arboriculture [APP-062]**. The Scheme will also result in the cessation of intensive arable farming within the Solar PV Sites. As identified in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**, this is expected to reduce the ongoing application of herbicides and pesticides, supporting improvements in habitat quality over the operational lifetime of the Scheme. The reversion of existing arable land within the Solar PV Sites to predominantly grassland habitats can be expected to benefit a wide range protected and notable species, as identified in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**. Mitigation and enhancement measures are detailed in the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]** and the **Outline Ecological Protection and Mitigation Strategy (OEPMS) [APP-284]**, which set out habitat creation, species protection measures, buffer zones and long-term ecological management. The preparation, approval and implementation of the detailed Landscape and Ecological Management Plan, substantially in accordance with the **OLEMP [APP-283]**, are secured through Requirement 7 in Schedule 2 of the **Draft Development Consent Order [APP-016]**. The preparation, approval and implementation of the detailed Ecological Protection and Mitigation Strategy, substantially in accordance with the O**EPMS [APP-284]**, are secured through Requirement 8 in Schedule 2 of the **Draft Development Consent Order [APP-016]**. These requirements ensure that ecological protection and enhancement

Reference	Theme	Comments/Issues Raised	Applicant's Response
			measures are delivered and maintained throughout construction and operation of the Scheme. The potential effects of the Scheme on agricultural land are assessed in **ES Volume 1, Chapter 17 Soils and Agriculture [APP-069]**, which considers baseline agricultural land use and quality and evaluates likely effects during construction, operation and decommissioning. The assessment confirms that the Scheme will result in a temporary and reversible loss of agricultural land during the operational period, with all land to be returned to its original use and condition as far as practicable following decommissioning. No permanent loss of agricultural land is anticipated. The Applicant does not consider that food security will be compromised by the Scheme (or solar energy more widely). The latest figures to September 2024 indicate that solar occupied around 21,200 ha of agricultural land in the UK. In 2025, 545,000 ha of arable land in England were left uncropped (source: Department for Environment, Food & Rural Affairs, Agricultural land use in England at 1 June 2025). It should also be noted that food security is not identified as an issue within the suite of Energy National Policy Statements or the National Planning Policy Framework (NPPF). Further, the Government's UK Solar Roadmap (2025) states that solar development is not considered to compromise food security, but that the climate and nature crisis poses the greatest long-term risk to food security- a risk which the Scheme directly helps to address by providing a secure, low-carbon source of electricity. As set out in Section 2 of the **Outline Decommissioning Strategy [APP-279],** post-decommissioning of the Scheme, the landowners would choose how the land is to be used and

Reference	Theme	Comments/Issues Raised	Applicant's Response
			managed. The landowner may return all of the land to arable use, although it is likely that established habitats such as hedgerows and woodland would be retained given their potential benefits to agricultural land and the wider farming estate. Post-decommissioning of the Scheme, the landowners would choose how the land is to be used and managed, the landowner may return all of the land to arable use, although it is likely that established habitats such as hedgerows and woodland would be retained given their potential benefits to agricultural land and the wider farming estate. a national scale and has therefore not been assessed. The capacity of local roads and infrastructure to accommodate construction vehicles is assessed in **ES Volume 1, Chapter 13: Transport and Access [APP-065]**, which considers construction traffic volumes, vehicle types, route suitability and network performance. The assessment concludes that, with appropriate mitigation in place, there would be no significant adverse impacts on the local highway network. Supporting technical information is provided in **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]**, which identifies specific locations where traffic management measures or passing arrangements may be required on narrower sections of construction routes. The assessment presented in Annex H of **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]** demonstrates adequate carriageway width or frequency of passing place opportunity to pass at least an HGV and a light vehicle as requested in comments provided by Wiltshire Council. All construction routes also include passing points to allow two HGVs to pass.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Mitigation measures to manage construction traffic are set out in the **Outline Construction Traffic Management Plan (CTMP) [APP-287]**. The CTMP is designed to minimise the effects of construction traffic on local roads and includes measures for vehicle routing, delivery scheduling and liaison with the local highway authority. The preparation, approval and implementation of the final CTMP, substantially in accordance with the outline CTMP, are secured through Requirement 15 of Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring construction traffic impacts on local roads and infrastructure are appropriately managed. In relation to suggestions that brownfield land or alternative locations should be used, including rooftop, these matters are addressed in **ES Volume 1, Chapter 4 Alternatives and Design Evolution** and in the **Statement of Need [APP-056 and APP-266]**. The Applicant has considered alternatives, including previously developed land and other forms of solar deployment, as part of the site selection and design evolution process. As shown in Table 2-2 of **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]**, the Applicant has considered previously developed land/brownfield land over 1 hectare within the area of search, based on the brownfield land registers of the relevant Local Planning Authorities, and concluded that none of the sites are large enough to provide a viable land parcel of at least 40 ha and sites were not considered to be available as they have planning permission for residential development and/or are allocated for residential/mixed use development. National policy and government guidance, as set out in the **Statement of Need [APP-266]**, recognise that while rooftop and smaller-scale solar installations are an important part of the

Reference	Theme	Comments/Issues Raised	Applicant's Response
			energy mix, they cannot alone meet the scale of capacity required to achieve clean power and net zero objectives. Large-scale ground-mounted solar therefore remains necessary in addition to, not instead of, rooftop solar. An assessment of landscape and visual effects is provided in the Landscape and Visual Impact Assessment (LVIA) presented in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**. The LVIA assesses effects on identified landscape and visual receptors, including residential properties and users of public rights of way, and identifies where significant effects may occur. The LVIA found no significant long term visual effects to Residential Properties as a consequence of the Scheme. The scale of development within the Order Limits has been significantly reduced from the layout assessed in the Preliminary Environmental Information Report (PEIR) through an iterative design process undertaken in response to consultation and in accordance with the mitigation hierarchy to avoid, reduce and mitigate adverse effects. As part of this design evolution, panels along the edge of the Cotswolds National Landscape and along the Fosse Way have been removed. Mitigation measures to address landscape and visual effects are set out in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**, Figure 3-4-1 to 3-4-5.2 **Landscape and Ecology Mitigation Plan [APP-084]** and detailed within the **Outline Landscape and Ecological Mitigation Plan (LEMP) [APP-283]** and the **Outline Ecological Protection and Mitigation Strategy (EPMS) [APP-284]**. These documents include proposals for new and enhanced planting, retention of existing hedgerows and woodland, and landscape integration measures to reduce visual effects over time.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			In addition, the Scheme design incorporates minimum offsets from existing landscape features, including residential properties, ancient woodland, woodland, hedgerows, public rights of way and watercourses, to further limit visual impacts. The preparation, approval and implementation of detailed landscape and ecological management plans, substantially in accordance with the **OLEMP [APP-283]** and **EPMS [APP-284]**, are secured through requirements in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that the identified mitigation measures are delivered and maintained throughout the lifetime of the Scheme.

6.51 Edward King

Table 6-51 RR-1248

Reference	Theme	Comments/Issues Raised	Applicant's Response
EK-001	Soils and Agriculture Construction and Decommissioning Transport and Access	I object to the Lime Down proposal for the following reasons: 1 It takes out of food production some valuable hectares when the world is starving. 2 Solar power is not the most efficient way to produce electricity in this country. 3 The site is too far from the area that can effectively utilise it, causing upset for many thousands of people. 4 The construction will cause considerable damage to neighbouring properties and infrastructure. First-hand experience of the M4 construction has given me an insight into this. Lorries will have to use roads not designed to take the weight nor numbers and go through villages that are not wide enough. 5 The impact that this proposal will have on the area is negative in the extreme and the ruination of it.	1. The potential effects of the Scheme on agricultural land are assessed in **ES Volume 1, Chapter 17 Soils and Agriculture [APP-069]**, which considers baseline agricultural land use and quality and evaluates likely effects during construction, operation and decommissioning. The assessment confirms that the Scheme will result in a temporary and reversible loss of agricultural land during the operational period, with all land to be returned to its original use and condition as far as practicable following decommissioning. No permanent loss of agricultural land is anticipated. The Applicant does not consider that food security will be compromised by the Scheme (or solar energy more widely). The latest figures to September 2024 indicate that solar occupied around 21,200 ha of agricultural land in the UK. In 2025, 545,000 ha of arable land in England were left uncropped (source: Department for Environment, Food & Rural Affairs, Agricultural land use in England at 1 June 2025). It should also be noted that food security is not identified as an issue within the suite of Energy National Policy Statements or the National Planning Policy Framework (NPPF). Further, the Government's UK Solar Roadmap (2025) states that solar development is not considered to compromise food security, but that the climate and nature crisis poses the greatest long-term risk to food security- a risk which the Scheme directly helps to address by providing a secure, low-carbon source of electricity. As set out in Section 2 of the **Outline Decommissioning Strategy [APP-279],** post-decommissioning of the Scheme, the landowners would choose how the land is to be used and managed. The landowner may return all of the land to arable use, although it is likely that established habitats such as hedgerows and woodland would be retained given their

Reference	Theme	Comments/Issues Raised	Applicant's Response
			potential benefits to agricultural land and the wider farming estate. 2. Solar energy is at the heart of the Clean Power 2030 Mission (January 2026 revised NPS EN-3, Para 2.10.2) and it is the Government's view that a secure, reliable, affordable, net zero consistent system in 2050 is likely to be composed predominantly of wind and solar (NPS EN-1, Para 3.3.20). Sunlight, the input energy source for solar, is abundant, predictable, renewable, low carbon and free. Figure 16 of the **Statement of Need [APP-266]** and related text (Section 7.4) demonstrates that there are many viable areas of solar irradiation in the UK. Figures 28 and 29 of the Statement of Need and related text (Section 8.5) demonstrate that a multi-technology approach to electricity supply, including solar, can reduce the effects of weather variability on output and is capable of closely matching a future projection of national electricity demand on a month-average level. The inclusion of a Battery Energy Storage System as part of the Scheme will enable energy generated by the Scheme to be stored and exported to the grid when it is needed, which will provide flexibility and improve grid reliability. That other countries may experience higher solar irradiation levels than the UK, means that they too could pursue solar generation to support their climate change plans. However, any such statistic cannot be used to demonstrate that solar in the UK does not work or should not be pursued. Government policy is clear that solar should be pursued in the UK with urgency because of the significant benefits it will bring to the UK energy system, consumers and to help meet UK clean power targets. 3. The Applicant confirms that the existing National Grid Melksham substation has been identified as the point of connection. This decision was based on available capacity,

Reference	Theme	Comments/Issues Raised	Applicant's Response
			network resilience, and strategic grid planning. As explained in **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]**, an initial search area was identified at a 5 km radius from the POC, however this was later expanded as no suitable and available sites within 5 km were identified. The search area was enlarged incrementally to a 20 km radius which is considered by the Applicant to be a viable cable connection distance for a solar project of this scale. The POC and 20 km search area is shown on Figure 1, Annex C of **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]**. Further, from an operational perspective, high voltage electricity transmission at 400kV in this case, is specifically designed to minimise energy losses over long distances. As such, the approximate 20km distance involved results in negligible losses. More details on how the Cable Route Corridor has been located and designed can be found in **ES Volume 1, Chapter 4 Alternatives and Design Evolution [APP-056]**. Several factors were considered designed to take a direct route whilst following existing features, such as roads, and avoiding sensitive receptors as far as practicable, such as habitat designations, residential and commercial properties, heritage assets, and a large number of land interests. The assessments set out in the various chapters of the **ES [APP-052 to APP-265]** detail what impacts are expected as a result of the Scheme based on the minimum and maximum parameters of the Scheme, and the mitigation and enhancement measures that are proposed to reduce these impacts. 4. The capacity of local roads and infrastructure to accommodate construction vehicles is assessed in **ES Volume**

Reference	Theme	Comments/Issues Raised	Applicant's Response
			1, Chapter 13: Transport and Access [APP-065], which considers construction traffic volumes, vehicle types, route suitability and network performance. The assessment concludes that, with appropriate mitigation in place, there would be no significant adverse impacts on the local highway network. Supporting technical information is provided in **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]**, which identifies specific locations where traffic management measures or passing arrangements may be required on narrower sections of construction routes. The assessment presented in Annex H of **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]** demonstrates adequate carriageway width or frequency of passing place opportunity to pass at least an HGV and a light vehicle as requested in comments provided by Wiltshire Council. All construction routes also include passing points to allow two HGVs to pass. A road condition and dilapidation survey of minor roads not typically used by HGV traffic is included as a measure within the CTMP. Any damage to verges or carriageway surfaces caused by construction vehicles will be rectified to the satisfaction of the local highway authority. Mitigation measures to manage construction traffic are set out in the **Outline Construction Traffic Management Plan (Outline CTMP) [APP-287]**. The CTMP is designed to minimise the effects of construction traffic on local roads and includes measures for vehicle routing, delivery scheduling and liaison with the local highway authority. The preparation, approval and implementation of the final CTMP, substantially in accordance with the outline CTMP, are

Reference	Theme	Comments/Issues Raised	Applicant's Response
			secured through Requirement 15 of Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring construction traffic impacts on local roads and infrastructure are appropriately managed throughout the construction phase of the Scheme. 5. The Applicant is confident that the proposed management and mitigation measures set out in the **ES [APP-052 to APP-265]** are comprehensive and robust and that the Scheme aligns with national and local planning policy; this is outlined in the **Planning Statement [APP-267]**. Of particular relevance are Annex A: National Policy Statement Accordance Tables and Annex B: Local Policy Accordance Tables, of the Planning Statement which set out an appraisal of the Scheme against the policies.

6.52 John Baillie

Table 6-52 RR-2342

Reference	Theme	Comments/Issues Raised	Applicant's Response
JB-001	Hydrology, Flood Risk and Drainage	This project neighbours land that I farm. My field drains pass through one of the solar fields to get to a waterway, I have had no assurance about how this is going to be addressed.	The Applicant acknowledges the presence of existing agricultural drainage systems. The assessment does not rely on alteration or severance of third-party field drains, and construction activities are required to maintain or reinstate existing drainage functionality where affected. Construction-phase controls for drainage protection and reinstatement are secured through the construction management framework, such as the **Outline Construction Environmental Management Plan [APP-277]**, and approval at discharge.
JB-002	Hydrology, Flood Risk and Drainage	They wish to put a cable linking two of the sites across my land. I have opened negotiations about this via an agent but only because it was pointed out they would be able to get compulsory access at minimal recompense to me. They are very vague about drainage repairs which will be on going as the ground settles after the cable installation. They are only mentioning a one off payment for a cable which will restrict my use of that land for 40 to 60 years. I feel there should be compulsory annual way leave payments to compensate for their restrictions.	The Applicant acknowledges the comments made and the applicant is actively engaging with the respondent's professional representative to reach an amicable solution, updates of which will be captured in the **Land and Rights Negotiations Tracker [APP-021]**. Drainage reinstatement following cable installation is addressed through construction controls requiring appropriate repair and reinstatement of land drainage, where affected, by trenching or settlement. These matters are secured through the construction management framework, for example, the **Outline Construction Environmental Management Plan [APP-277]** and do not give rise to increased flood risk or long-term drainage effects.

6.53 Matthew Gerard Newman

Table 6-53 RR-3090

Reference	Theme	Comments/Issues Raised	Applicant's Response
MGN-001	Site selection and Alternatives Transport and Access	1). Wrong project, wrong place Any project that is 20km from a grid connection is in the wrong location. The extensive road/highway alterations proves the local infrastructure is unsuitable for the development and as proposed would alter the character of the communities irrevocably.	The Applicant confirms that the existing National Grid Melksham substation has been identified as the point of connection. This decision was based on available capacity, network resilience, and strategic grid planning. As explained in **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]**, an initial search area was identified at a 5 km radius from the POC, however this was later expanded as no suitable and available sites within 5 km were identified. The search area was enlarged incrementally to a 20 km radius which is considered by the Applicant to be a viable cable connection distance for a solar project of this scale. The POC and 20 km search area is shown on Figure 1, Annex C of **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]**. Further, from an operational perspective, high voltage electricity transmission at 400kV in this case, is specifically designed to minimise energy losses over long distances. As such, the approximate 20km distance involved results in negligible losses. More details on how the Cable Route Corridor has been located and designed can be found in **ES Volume 1, Chapter 4 Alternatives and Design Evolution [APP-056]**. Several factors were considered designed to take a direct route whilst following existing features, such as roads, and avoiding sensitive receptors as far as practicable, such as habitat designations, residential and commercial properties, heritage assets, and a large number of land interests. The assessments set out in the various chapters of the **ES [APP-052 to APP-265]** detail what impacts are expected as a result of the Scheme based on the minimum and maximum parameters of the Scheme, and the mitigation and enhancement measures that are proposed to reduce these impacts. The capacity of local roads and infrastructure to accommodate

Reference	Theme	Comments/Issues Raised	Applicant's Response
			construction vehicles is assessed in **ES Volume 1, Chapter 13: Transport and Access [APP-065]**, which considers construction traffic volumes, vehicle types, route suitability and network performance. The assessment concludes that, with appropriate mitigation in place, there would be no significant adverse impacts on the local highway network. Supporting technical information is provided in **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]**, which identifies specific locations where traffic management measures or passing arrangements may be required on narrower sections of construction routes. The assessment presented in Annex H of **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]** demonstrates adequate carriageway width or frequency of passing place opportunity to pass at least an HGV and a light vehicle as requested in comments provided by Wiltshire Council. All construction routes also include passing points to allow two HGVs to pass. A road condition and dilapidation survey of minor roads not typically used by HGV traffic is included as a measure within the CTMP. Any damage to verges or carriageway surfaces caused by construction vehicles will be rectified to the satisfaction of the local highway authority. Mitigation measures to manage construction traffic are set out in the **Outline Construction Traffic Management Plan (Outline CTMP) [APP-287]**. The CTMP is designed to minimise the effects of construction traffic on local roads and includes measures for vehicle routing, delivery scheduling and liaison with the local highway authority. The preparation, approval and implementation of the final CTMP,

Reference	Theme	Comments/Issues Raised	Applicant's Response
			substantially in accordance with the **Outline CTMP [APP-287]**, are secured through Requirement 15 of Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring construction traffic impacts on local roads and infrastructure are appropriately managed throughout the construction phase of the Scheme.
MGN-002	Ecology and Biodiversity	2).Environmental BESS systems usually require some kind of on demand energy supply to ensure the safety and lifespan of batteries. This is often provided for by the least Environmental source i.e. diesel generators. Can we be assured this will not be the case? If not then the green credentials disappear.	The Applicant's proposals do not include on-site diesel generation facilities to provide an energy supply to the BESS.
MGN-003	Ecology and Biodiversity	3). Personal It is proposed that we are to be directly affected by being on the proposed cable route. We have reluctantly complied with the company to allow numerous surveys of our land. But we have been denied access to the results despite requesting them several times. Why? I don't think it unreasonable to know if they are aware of any environmental issues or underground infrastructure before any damage is done.	The Applicant acknowledges the comments made and the applicant is actively engaging with the respondent's professional representative to reach an amicable solution, updates of which will be captured in the **Land and Rights Negotiations Tracker [APP-021]**.
MGN-004	Soils and Agriculture Socio-Economics, Tourism and Recreation	As is evident from previous infrastructure projects agricultural land takes decades to recover productivity despite assurances to the contrary. That is another bodyblow to our business. If the project were sited next to the grid connection they wouldn't need to compromise a 20km swathe of	The Applicant acknowledges the comments made and is actively engaging with the respondent's professional representative to agree appropriate and reasonable accommodation works and to reach an amicable solution for all parties. Notwithstanding this, under the provisions of the Land Compensation Act 1961 and the Land Compensation Act 1973, reasonable losses incurred by the landowner or occupier as a result of the Applicant's works are

Reference	Theme	Comments/Issues Raised	Applicant's Response
		good agricultural land. In return for our reluctant compliance with the demands of the process, we have been issued with terms (Redacted) This was (Redacted) and have been forced to be withdrawn.	recoverable following claims to the Applicant upon a loss being incurred.
MGN-005	Description and DCO Process	The motive behind this project is (Redacted) of course for the developers. Driven by an overtly political decision but which will be funded over many years by the bill payers and communities despoiled and/or destroyed by it. We ask you to protect us from these two vested interests and decide in the interests of us all and reject the application.	The Applicant confirms that Lime Down Solar Park is being developed solely through private sector financing and that it has not received, and is not receiving any public money, subsidy or funding in the development of the Scheme. The Applicant is confident that the proposed management and mitigation measures set out in the **ES [APP-052 to APP-265]** are comprehensive and robust and that the Scheme aligns with national and local planning policy; this is outlined in the **Planning Statement [APP-267]**. Of particular relevance are Annex A: National Policy Statement Accordance Tables and Annex B: Local Policy Accordance Tables, of the Planning Statement which set out an appraisal of the Scheme against the policies.

6.54 Rachael Baker

Table 6-54 RR-3849

Reference	Theme	Comments/Issues Raised	Applicant's Response
RB-001	Site selection and Alternatives Noise and Vibration Socio-Economics, Tourism and Recreation Cumulative and In-Combination Effects	The scale of the Lime Down solar project is disproportionate to its location. By completely encircling residential areas, the proposal causes an unacceptable loss of residential amenity. The cumulative impact of operational noise, coupled with the irreversible degradation of the local environment and biodiversity, makes this site fundamentally unsuitable. We urge the developers to seek more appropriate, non-residential locations that do not impose such a detrimental footprint on existing communities.	Scale The Scheme has been designed to deliver the greatest possible benefit from the available land and the available grid connection, whilst avoiding, minimising and/or mitigating harmful environmental effects. As per the description set out in **ES Volume 1, Chapter 3: The Scheme [APP-055]** the total area within the DCO Order Limits encompasses approximately 1,237 hectares (ha). Of this, the 'Solar PV Sites' comprise approximately 749.1 ha of land. Around 479.5 ha of this land is proposed as being required for installation of solar PV, battery storage, and associated infrastructure. The remaining 269.5 ha would provide areas dedicated to ecological mitigation, measurable Biodiversity Net Gain (BNG) delivery, landscaping, offsets and agricultural land managed for environmental enhancement and habitat creation. The Applicant remains committed to delivering a Scheme that makes a meaningful contribution to the UK's transition to net zero, while also seeking to minimise adverse impacts and maximise opportunities for environmental enhancement and community benefits. Landscape and Visual An assessment of landscape and visual effects is provided in the Landscape and Visual Impact Assessment (LVIA) presented in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**. The LVIA assesses effects on identified landscape and visual receptors, including residential properties and users of public rights of way, and identifies where significant effects may occur. The LVIA found no significant long term visual effects to Residential Properties as a consequence of the Scheme. The scale of development within the Order Limits has been significantly reduced from the layout assessed in the Preliminary

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Environmental Information Report (PEIR) through an iterative design process undertaken in response to consultation and in accordance with the mitigation hierarchy to avoid, reduce and mitigate adverse effects. As part of this design evolution, panels along the edge of the Cotswolds National Landscape and along the Fosse Way have been removed. Mitigation measures to address landscape and visual effects are set out in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**, Figure 3-4-1 to 3-4-5.2 **Landscape and Ecology Mitigation Plan [APP-084]** and detailed within the **Outline Landscape and Ecological Mitigation Plan (LEMP) [APP-283]** and the **Outline Ecological Protection and Mitigation Strategy (EPMS) [APP-284]**. These documents include proposals for new and enhanced planting, retention of existing hedgerows and woodland, and landscape integration measures to reduce visual effects over time. In addition, the Scheme design incorporates minimum offsets from existing landscape features, including residential properties, ancient woodland, woodland, hedgerows, public rights of way and watercourses, to further limit visual impacts. The preparation, approval and implementation of detailed landscape and ecological management plans, substantially in accordance with the **OLEMP [APP-283]** and **EPMS [APP-284]**, are secured through requirements in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that the identified mitigation measures are delivered and maintained throughout the lifetime of the Scheme. <u>Noise and Vibration</u> An assessment of the effects of the Scheme on noise and vibration is provided in **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**, with supporting technical information supplied in **ES Volume 3, Appendix 14-4: Noise Modelling [APP-237]**. The assessment considers potential noise and

Reference	Theme	Comments/Issues Raised	Applicant's Response
			vibration impacts during construction, operation and decommissioning, including from solar PV panels and associated infrastructure. The Applicant notes that the approach to noise and vibration has been discussed with Wiltshire Council, as described in Section 14.2 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**. Construction phase The noise and vibration impacts arising from construction activities are assessed in Section 14.10 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**. For the purposes of the assessment, a reasonable worst-case scenario assuming piling activities has been considered. Mitigation measures associated with construction activity are presented in Section 14.9 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]** and are committed to through the **Outline Construction Environmental Management Plan [APP-277]**. A noise monitoring programme agreed with Wiltshire Council will be carried out during construction. The preparation, approval and implementation of the Construction Environmental Management Plan, substantially in accordance with the **Outline CEMP [APP-277]**, is secured through Requirement 13 in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that construction noise and vibration are appropriately controlled. With these measures in place, the assessment concludes that no significant effects from construction noise or vibration are expected. Operational phase The noise impacts from the operation of the Scheme and its components are assessed in Section 14.10 of **ES Volume 1,**

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Chapter 14: Noise and Vibration [APP-066], with supporting modelling provided in **ES Volume 3, Appendix 14-4: Noise Modelling [APP-237]**. A penalty has been applied to predicted noise levels from the Solar PV Sites to account for the distinctive nature of the sound. Potential mitigation measures are detailed in Section 14.9 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**, and with such measures in place, significant effects from operational noise are not expected. The **Outline Operational Environmental Management Plan [APP-278]** commits to noise levels from the Scheme at residential dwellings being the same as or below those modelled in the ES. This provides assurance that significant effects from operational noise will be avoided, while allowing flexibility in how this is achieved. The preparation, approval and implementation of the detailed OEMP, substantially in accordance with the outline plan, are secured through Requirement 14 of Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring operational noise is appropriately controlled throughout the lifetime of the Scheme. <u>Ecology and Biodiversity</u> Potential impacts on ecology and biodiversity are fully assessed in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**. This assessment considers baseline ecological conditions and evaluates likely significant effects arising during the construction, operation and decommissioning phases of the Scheme. It identifies avoidance, mitigation and enhancement measures to address potential impacts on habitats and protected and notable species. It also identifies opportunities for ecological enhancement, including the creation and long-term management of habitats, and delivery of biodiversity net gain. The assessment concludes that, with the identified embedded and additional mitigation measures in place, no unacceptable significant adverse effects on ecology and biodiversity are anticipated.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			The Applicant notes that the approach to the assessment in relation to ecology and biodiversity in general is under discussion with Wiltshire Council and Natural England and is set out in the relevant **Statements of Common Ground** to be submitted at Deadline 1. During construction, specific measures are proposed to avoid disturbance and displacement of wildlife. These include protective buffers around sensitive habitats and features, timing restrictions on vegetation clearance, pre-construction ecological surveys, species-specific mitigation, and pollution prevention controls which are set out in the **Outline Ecological Protection and Mitigation Strategy (EPMS) [APP-284]**. Measures to protect trees and hedgerows are also set out in **ES Volume 1, Chapter 10 Arboriculture [APP-062]**. The Scheme will also result in the cessation of intensive arable farming within the Solar PV Sites. As identified in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**, this is expected to reduce the ongoing application of herbicides and pesticides, supporting improvements in habitat quality over the operational lifetime of the Scheme. The reversion of existing arable land within the Solar PV Sites to predominantly grassland habitats can be expected to benefit a wide range protected and notable species, as identified in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**. Mitigation and enhancement measures are detailed in the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]** and the **Outline Ecological Protection and Mitigation Strategy (OEPMS) [APP-284]**, which set out habitat creation, species protection measures, buffer zones and long-term ecological management. The preparation, approval and implementation of the detailed Landscape and Ecological Management Plan, substantially in accordance with the **OLEMP [APP-283]**, are secured through

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Requirement 7 in Schedule 2 of the **Draft Development Consent Order [APP-016]**. The preparation, approval and implementation of the detailed Ecological Protection and Mitigation Strategy, substantially in accordance with the O**EPMS [APP-284]**, are secured through Requirement 8 in Schedule 2 of the **Draft Development Consent Order [APP-016]**. These requirements ensure that ecological protection and enhancement measures are delivered and maintained throughout construction and operation of the Scheme. <u>Cumulative and In-Combination Effects</u> A comprehensive Cumulative and In-Combination Effects Assessment has been undertaken in accordance with Planning Inspectorate Advice Note 17 and the relevant NPS EN-1, NPS EN-3 and NPS EN-5 requirements which are set out within **ES Volume 1, Chapter 21: Cumulative and In-Combination Effects [APP-074]** and associated appendices**, ES Volume 3, Appendix 21-1 Long List of In-Combination Effects and Cumulative Developments [APP-264]**. Interaction with proposed or consented but not yet built developments has been fully explored within each of the technical assessments **[APP-059 - APP-072]** with a summary of each of these assessments provided within **ES Volume 1, Chapter 21 In-Combination and Cumulative Effects [APP-073]**. Existing schemes are captured within the baseline environment. The four stage cumulative assessment methodology is described within **ES Volume 1, Chapter 6: EIA Methodology [APP-058]**. 358 developments were included in the **Long List [APP-264]**. 41 developments are included in the short list (and are therefore assessed) including a number of proposed solar and BESS developments. The list of developments included in the cumulative assessment was reviewed and developed in consultation with Wiltshire Council. Taking a conservative worse case approach, significant cumulative effects are identified at a limited and discrete number of receptors comprising tourism and recreation impacts during the construction phase on Corsham Park, PRoW WT|CORM|122,

Reference	Theme	Comments/Issues Raised	Applicant's Response
			long path and Sustrans Cycle Route 403, and on skylark at a District level. Skylark-specific mitigation and habitat enhancement measures are incorporated into the Scheme design to reduce effects on skylark as far as practicable and are described in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061].** These include the provision of suitably large, open set-aside and grassland habitats designed to provide suitable skylark breeding and foraging conditions. These measures are illustrated in **ES Volume 2, Figure 3-4: Landscape and Ecological Mitigation Plan [APP-084]** and detailed in the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]**. Such measures have been designed to reduce the anticipated residual effects resulting from the Scheme to a Local level of geographic importance.

6.55 Joyce Kirk

Table 6-55 RR-2469

Reference	Theme	Comments/Issues Raised	Applicant's Response
JKK-001	Human Health	I object for the following reasons : Mental wellbeing will suffer greatly due to the extreme changes to the beautiful countryside and the extreme disruption this scheme will cause.	Impacts on mental health and wellbeing are assessed in **ES Volume 1, Chapter 18: Human Health [APP-070]**. This chapter provides a comprehensive assessment of the Scheme's potential effects on human health, including mental health and wellbeing, through consideration of a broad range of health determinants. These include access to open space and recreation, transport and connectivity, community identity and cohesion, employment and income, noise and vibration, air quality, and access to health and social care services. The assessment applies a health "lens" to the findings of relevant technical chapters and concludes that, with the embedded mitigation and additional measures secured through the relevant management plans **[APP-277** to **APP-287]** secured by their respective requirements in Schedule 2 to the **Draft DCO [APP-016]**, the Scheme would not give rise to significant adverse effects on population health, including mental health and wellbeing. Mitigation measures include (but are not limited to) ensuring PROWs remain open as much as is practicable, HGV movements are set to defined routes and within set hours, community liaison and engagement is maintained, and construction impacts on noise and air quality are regulated. With specific regard to community liaison, this is directly secured through Requirement 4 in Schedule 2 to the **Draft DCO [APP-016]** through the provision of a community liaison group. This group will act as an intermediary between the public and the onsite contractors to ensure community concerns and any information they need are communicated and responded to, so as to reduce community anxiety and impacts on mental wellbeing, and to assist in directing the public to mental health support if required. The assessment in **ES Volume 1, Chapter 18: Human Health [APP-070]** focuses on communities within a 2 km Study Area surrounding the Scheme, identified as those most likely to experience potential health-related effects. Baseline analysis demonstrates that rates of poor mental health within

Reference	Theme	Comments/Issues Raised	Applicant's Response
			the Study Area are generally lower than national averages, and the assessment considers potential pathways by which the Scheme could influence mental wellbeing, including changes to environment, amenity, access and community factors. Residual effects of the Scheme on health following mitigation are assessed as not significant at any phase of the Scheme. Consultation with Wiltshire Council's Public Health Team has informed the approach to mental health considerations, as documented in **ES Volume 3, Appendix 18-1: Human Health Consultation [APP-244].** Through this engagement, the Applicant has committed to signposting locally available mental health and wellbeing resources to members of the public engaging with the Scheme, using information provided by Wiltshire Council's Public Health Team. The Applicant will continue to monitor consultation responses relating to mental health and will provide appropriate signposting to existing local support services where requested. The Applicant notes that the assessment methodology for health and wellbeing has been agreed with Wiltshire Council's Public Health team and is set out in the relevant Statement of Common Ground to be submitted at Deadline 1.
JKK-002	Transport and Access	The volume of traffic and size of transporters required will pose a huge risk and extreme danger to other road users as these are country roads and not at all suitable for such a scheme.	The potential effects of construction traffic on highway safety and accident risk are assessed in **ES Volume 1, Chapter 13: Transport and Access [APP-065]**, which considers changes in traffic flows, HGV movements and accident risk on the local road network. Links experiencing traffic increases above defined assessment thresholds were taken forward for detailed analysis. Supporting technical evidence is provided in **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]**, which includes an assessment of baseline accident data and predicted changes in collision risk arising from construction traffic. The assessment concludes that the level of construction traffic associated with the Scheme is unlikely to materially affect road safety on links within the Study Area, and no significant adverse

Reference	Theme	Comments/Issues Raised	Applicant's Response
			effects on accident risk are anticipated. Mitigation measures to manage construction traffic safely are set out in the **Outline Construction Traffic Management Plan [APP-287]**, which includes defined vehicle routing, delivery scheduling and coordination with the local highway authority. The preparation, approval and implementation of the final CTMP, substantially in accordance with the outline CTMP, are secured through Requirement 15 of Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring construction traffic is managed safely throughout the construction phase of the Scheme.
JKK-003	Landscape and Visual	Decimation of the countryside and AONB as it will be turned into an industrial area.	The Scheme has been designed to deliver the greatest possible benefit from the available land and the available grid connection, whilst avoiding, minimising and/or mitigating harmful environmental effects. As per the description set out in **ES Volume 1, Chapter 3: The Scheme [APP-055]** the total area within the DCO Order Limits encompasses approximately 1,237 hectares (ha). Of this, the 'Solar PV Sites' comprise approximately 749.1 ha of land. Around 479.5 ha of this land is proposed as being required for installation of solar PV, battery storage, and associated infrastructure. The remaining 269.5 ha would provide areas dedicated to ecological mitigation, measurable Biodiversity Net Gain (BNG) delivery, landscaping, offsets and agricultural land managed for environmental enhancement and habitat creation. The Applicant remains committed to delivering a Scheme that makes a meaningful contribution to the UK's transition to net zero, while also seeking to minimise adverse impacts and maximise opportunities for environmental enhancement and community benefits. The Cotswolds National Landscape (CNL) is fully assessed as a standalone receptor within **ES Volume 3, Appendix 8.6: Assessment of Effects on the Special Qualities of the**

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Cotswolds National Landscape [APP-197]. This assessment considers the effects of the Scheme on landscape character, visual amenity and the special qualities of the CNL, including tranquillity. The assessment found that there would be some short term impact to landscape character within the setting of the CNL but due to the avoidance measures embedded within the Scheme, harm to the CNL itself would be minimal with beneficial effects in the long term which would further the purposes of the designation. In respect of visual amenity, some short-term adverse effects would be experienced by a small number of visual receptors with views to and from the CNL. However, these would reduce over time as a result of the proposed mitigation. The assessment of effects on the special qualities of the CNL scoped out 3 SQs as there is no association with the Site. The assessment found that there are no direct effects on the remaining SQs. There are some Minor/ Negligible short-term effects on a small number of visual receptors within the setting of the CNL which effect SQ7 -Tranquillity and SQ13 Archaeology and historic associations. However, these effects are mitigated by Year 15 when proposed vegetation has matured. The assessment also found that there would be beneficial effects on SQ 6 – Biodiversity and nature recovery as a result of the delivery of approximately 119.7 hectares of flower-rich neutral grassland (as defined in the BNG assessment) and SQ 12 - An accessible landscape as a result of the delivery of approximately 12.8km of new permissive paths within the setting of the CNL. The remaining SQs would remain entirely intact. The Scheme was refined through an iterative design process to avoid and reduce effects on the CNL and its setting. Panels along the edge of the CNL were removed from the Order Limits in fields C2, C3 and C4 where significant visual effects on receptors within the CNL were identified. Panels were also removed from fields C1, C6, C8, the western section of C9 and the majority of C10, with this land now proposed for ecological mitigation to protect the setting of the CNL. In addition, panels

Reference	Theme	Comments/Issues Raised	Applicant's Response
			within fields A11 and A12 were removed and the land repurposed for ecological mitigation to protect the setting of the CNL towards Sherston. All land parcels adjacent to the CNL are proposed to deliver habitat enhancement, informed by the CNL Management Plan and the Cotswolds National Landscape Strategy and Guidelines, to further the purposes of the designation. Details of the proposed landscape and ecological mitigation and enhancement measures are provided in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**, Figure 3-4-1 to 3-4-5.2 **Landscape and Ecology Mitigation Plan [APP-084]** and the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]**, and the **Outline Ecological Protection and Mitigation Strategy (EPMS) [APP-284]**. The preparation, approval and implementation of the detailed Landscape and Ecological Management Plan, substantially in accordance with the **OLEMP [APP-283]**, are secured through Requirement 7 in Schedule 2 of the **Draft Development Consent Order [APP-016]**. The preparation, approval and implementation of the detailed Ecological Protection and Mitigation Strategy, substantially in accordance with the **EPMS [APP-284]**, are secured through Requirement 8 in Schedule 2 of the **Draft Development Consent Order [APP-016]**. These requirements ensure that the identified mitigation and enhancement measures are delivered and maintained throughout the lifetime of the Scheme.
JKK-004	Noise and Vibration	The noise, disruption and safety hazards during the years of construction and beyond.	The noise and vibration impacts arising from construction activities are assessed in Section 14.10 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**, with supporting technical information provided in **ES Volume 3, Appendix 14-4: Noise Modelling [APP-237]**. For the purposes of the assessment, a reasonable worst-case scenario assuming piling activities has been considered.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			The Applicant notes that the approach to construction noise and vibration has been discussed with Wiltshire Council, as described in Section 14.2 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**. Mitigation measures associated with construction activity are presented in Section 14.9 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]** and are committed to through the **Outline Construction Environmental Management Plan [APP-277]**. A noise monitoring programme agreed with Wiltshire Council will be carried out during construction. The preparation, approval and implementation of the Construction Environmental Management Plan, substantially in accordance with the **Outline CEMP [APP-277]**, are secured through Requirement 13 in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that construction noise and vibration are appropriately controlled throughout the construction phase of the Scheme. With these measures in place, the assessment concludes that no significant effects from construction noise or vibration are expected. Impacts on physical health and wellbeing are assessed in **ES Volume 1, Chapter 18: Human Health [APP-070]**. This chapter provides a comprehensive assessment of the Scheme's potential effects on human health, including physical health and wellbeing, through consideration of a broad range of health determinants with physical health pathways. These include access to housing, access to open space and recreation, transport and connectivity, climate change, air quality, water quality, land quality, noise and vibration, and access to health and social care services. The assessment applies a health-based review of relevant technical chapters to identify potential pathways by which the Scheme could affect physical health. It concludes that, with

Reference	Theme	Comments/Issues Raised	Applicant's Response
			embedded mitigation and additional measures secured, the Scheme would not give rise to significant adverse effects on population physical health at any phase of the Scheme. Priority has been given in the assessment to communities most likely to experience potential health-related effects, within the 2 km Study Area surrounding the Scheme. The Applicant notes that the assessment methodology for health and wellbeing has been agreed with Wiltshire Council's Public Health team and is set out in the Statement of Common Ground with Wiltshire Council to be submitted at Deadline 1.
JKK-005	Noise and Vibration	Noise from panels as they follow the sun and from substations and battery storage units.	The noise impacts from the operation of the Scheme and its components are assessed in Section 14.10 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**, with supporting modelling provided in **ES Volume 3, Appendix 14-4: Noise Modelling [APP-237]**. A penalty has been applied to predicted noise levels from the Solar PV Sites to account for the distinctive nature of the sound. Potential mitigation measures are detailed in Section 14.9 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**, and with such measures in place, significant effects from operational noise are not expected. The **Outline Operational Environmental Management Plan [APP-278]** commits to noise levels from the Scheme at residential dwellings being the same as or below those modelled in the ES. This provides assurance that significant effects from operational noise will be avoided, while allowing flexibility in how this is achieved. The preparation, approval and implementation of the detailed OEMP, substantially in accordance with the outline plan, are secured through Requirement 14 of Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring operational noise is appropriately controlled throughout the lifetime of the Scheme.

Reference	Theme	Comments/Issues Raised	Applicant's Response
JKK-006	Other Environmental Matters	Fire risk from battery storage units.	The Battery Energy Storage System (BESS) containers proposed for the Scheme will incorporate built-in safety features for fire avoidance, detection and suppression. The Scheme layout also incorporates separation distances between battery containers to ensure that any isolated fire would not become widespread or lead to a major incident. As shown on **ES Volume 2, Figure 3-1: Indicative Site Layout Plan [APP-081]**, the battery containers will be located more than 200 metres from the nearest Public Right of Way and more than 500 metres from any residential receptors. The Applicant notes that the approach to BESS safety is under discussion with Dorset and Wiltshire Fire and Rescue Service (D&WFRS) and is set out in the relevant **Statement of Common Ground** to be submitted at Deadline 1. An **Outline Battery Safety Management Plan (OBSMP) [APP-286]** has been prepared for the Scheme using guidance from Dorset and Wiltshire Fire and Rescue Service and incorporating recommendations of the National Fire Chiefs Council. The OBSMP ensures that risks associated with battery storage are appropriately mitigated. Section 6.1.1 of the OBSMP confirms that at the detailed design stage, the selected BESS will have undertaken Large Scale Fire Testing (LSFT) to fully inform inputs for risk assessment tools which will be utilised together with detailed consequence modelling to provide a comprehensive site operations and emergency response safety audit. LSFT is a mandatory requirement under NFPA 855 (2026) safety standards to demonstrate thermal insulation protection capabilities of the BESS enclosure design, validate minimum equipment spacing distances, and demonstrate that deflagrations do not occur and/or can be safely constrained. As set out in **Outline Battery Safety Management Plan (OBSMP) [APP-286]**, the BESS Area will have a robust and validated Emergency Response Plan (ERP), developed in

Reference	Theme	Comments/Issues Raised	Applicant's Response
			consultation with Dorset & Wiltshire Fire and Rescue Service at the detailed design stage. Section 5.4 of the OBSMP specifies the typical emergency response protocols, procedures and safety information that will be included in the ERP. The ERP will apply to all stages of the Scheme, including construction, operation and decommissioning. Potential effects of toxic gases arising from a BESS fire are assessed in **ES Volume 1, Chapter 15: Air Quality [APP-067]** and in **ES Volume 1, Chapter 20: Other Environmental Matters [APP-072]**, Section 20.7: Major Accidents and Disasters. An assessment of how these fumes could affect sensitive receptors within a 1 km radius of the BESS Area, including residential properties and ecological receptors, is provided in **ES Volume 1, Chapter 15: Air Quality [APP-067]**. This assessment concludes that no significant off-site impacts are predicted should a fire event occur. In the unlikely event of a fire, the precautionary measures set out in the **Outline Battery Safety Management Plan (OBSMP) [APP-286]** — including advice to remain indoors and close windows — would further reduce potential impacts to residents. The **OBSMP [APP-286]** is secured through Requirement 6 (Battery safety management) in Schedule 2 of the **Draft DCO [APP-016]**, which provides that Work No. 2 must not commence until a Battery Safety Management Plan has been submitted to and approved by the relevant planning authority. The approved plan must be substantially in accordance with the Outline Battery Safety Management Plan. The Draft DCO also requires the relevant planning authority to consult with Dorset and Wiltshire Fire and Rescue Service and the Environment Agency before determining the application, and that the Battery Safety Management Plan must be implemented as approved.
JKK-007	Hydrology, Flood Risk and Drainage	Increased flooding risks.	An assessment of the effects of the Scheme on flood risk both within the Site and the surrounding area is provided in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [APP-063]**, with supporting information provided in **ES Volume 3, Appendix 11-1 to 11-9: Flood Risk Assessment and**

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Drainage Strategy [APP-210 to APP-218]. The assessment concludes that, with the embedded mitigation measures secured, the Scheme would not result in a material increase in off-site flood risk, including to adjacent communities and downstream receptors, and that any on-site flood risk would be managed such that the Scheme remains safe and operable for its lifetime. The assessment has been prepared in accordance with national policy and best practice guidance and in consultation with the Environment Agency and Lead Local Flood Authority and is set out in the relevant **Statement of Common Ground** to be submitted at Deadline 1. The **Outline Construction Environmental Management Plan (CEMP) [APP-277]** has been developed to control construction-phase risks and ensure there is no material increase in off-site flood risk. In accordance with NPS EN-3 (paragraph 2.10.84), the assessment differentiates between solar PV panel areas, which drain to the existing ground and therefore do not generally give rise to significant drainage effects, and associated infrastructure (for example access tracks, temporary construction compounds, substations and the BESS) where runoff controls are required. Where drainage measures are necessary, these include permeable surfacing, infiltration features, swales and attenuation storage to manage surface water and maintain greenfield runoff behaviour, as applicable. Requirement 13 in Schedule 2 to the **Draft DCO [APP-016]** secures that part of the authorised development can commence until, a CEMP is submitted to and approved by the relevant planning authority. The CEMP must be substantially in accordance with the Outline CEMP, and all construction works associated must be carried out in accordance with the approved CEMP.
JKK-008	Soils and Agriculture	The loss of farm land for growing crops and grazing animals.	An assessment of the potential effects of the Scheme on soils and agricultural land is provided in **ES Volume 1, Chapter 17**

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Soils and Agriculture [APP-069]. This chapter considers baseline agricultural land quality, including Best and Most Versatile (BMV) land, and assesses likely significant effects arising from construction, operation and decommissioning of the Scheme, together with embedded mitigation measures. The areas of each Agricultural Land Classification (ALC) grade affected by the Scheme are set out in **ES Chapter 17**, Section 17.7. Of the agricultural land within the Solar PV Sites, approximately 477.4 hectares (around 67%) is classified as Subgrade 3b or Grade 4 and is therefore not BMV land. There is no Grade 1 land, around 30.8 hectares (approximately 4%) of Grade 2 land, and approximately 209.3 hectares (around 29%) of Subgrade 3a land. The distribution of ALC grades is shown in **ES Volume 2, Figure 17-2: Agricultural Land Classification Mapping [APP-172]**. The Applicant has had regard to agricultural land quality in the design and site selection process and has sought, where practicable, to locate infrastructure on lower quality land. The Scheme will result in a temporary but long-term and reversible loss of agricultural land for the operational life of the Scheme. As set out in **ES Chapter 17**, Section 17.10, this gives rise to a temporary, long-term moderate adverse effect on agricultural land overall, and a temporary, long-term major/moderate adverse effect on BMV land, both of which are assessed as significant. These effects are fully reported in the ES and are a matter for the Secretary of State to weigh in the planning balance against the need for the Scheme and its wider benefits. There are no significant permanent effects on agricultural land, as all land will be returned to its original use and condition as far as practicable following decommissioning. The Applicant notes that the approach to assessing the quality of the agricultural land is under further discussion with Natural England and is set out in the relevant Statement of Common Ground to be submitted at Deadline 1.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Measures to avoid and minimise effects on soils and agricultural land are embedded within the Scheme design and secured through the DCO. These include the preparation and implementation of a **Soil Resources Management Plan (SRMP) [APP-280]**, which will control soil handling, storage and reinstatement during construction, operation and decommissioning, and a requirement to prepare and implement a Decommissioning Strategy in accordance with the **Outline Decommissioning Strategy [APP-279]**. Through the establishment and maintenance of long-term grassland beneath and between the solar arrays, soil health, quality and structure are anticipated to improve over the lifetime of the Scheme, resulting in a temporary, moderate beneficial effect on soil resources at decommissioning, which is assessed as significant (**ES Chapter 17**, Sections 17.10 and 17.12).
JKK-009	Construction and Decommissioning	The damage, disruption and safety threats outweigh significantly any possible benefits of this proposed solar farm in this area.	The Applicant has responded to the matters raised in this Relevant Representation in detail above.

6.56 Olivia Frost

Table 6-56 RR-3583

Reference	Theme	Comments/Issues Raised	Applicant's Response
OF-001	Construction and Decommissioning Ecology and Biodiversity Socio-Economics, Tourism and Recreation Transport and Access	In bullet form: Construction - Widespread disruption from lengthy construction of the sites, damage and danger to our narrow roads and countryside lanes - widening of turning areas for HGVs and demolition of hedgerows and bridle/footpaths - I ride on the roads at least three times a week and will be unable to do so due to the danger and noise from construction traffic on usually quiet and picturesque roads	The likely significant effects of the Scheme during the construction phase are assessed throughout the **ES [APP-052 to APP-265]**, including effects on traffic and transport, noise and vibration, air quality, landscape and visual amenity, ecology, and local communities. Where likely significant effects are identified, appropriate mitigation measures are incorporated into the Scheme. Measures to limit disruption during construction are set out in the **Outline Construction Environmental Management Plan (CEMP) [APP-277]**. **Requirement 13 in Schedule 2 to the Draft DCO [APP-016]** secures that part of the authorised development can commence until, a CEMP is submitted to and approved by the relevant planning authority. The CEMP must be substantially in accordance with the Outline CEMP, and all construction works associated must be carried out in accordance with the approved CEMP. The effects of construction traffic on the local highway network are assessed in **ES Volume 1, Chapter 13: Transport and Access [APP-065]**, which considers construction vehicle routing, traffic volumes and potential impacts on highway safety and road condition. The assessment concludes that, with appropriate management measures in place, construction traffic effects can be appropriately controlled. Mitigation measures to manage construction traffic and protect local roads are set out in the **Outline Construction Traffic Management Plan (CTMP) [APP-287]**. The CTMP has been developed to minimise impacts on the local highway network and includes measures for routing, scheduling of deliveries and liaison with the local highway authority. Supporting technical evidence is provided in **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]**, which includes an assessment of baseline accident data and predicted changes in collision risk arising from construction traffic.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			The assessment concludes that the level of construction traffic associated with the Scheme is unlikely to materially affect road safety on links within the Study Area, and no significant adverse effects on accident risk are anticipated. A road condition and dilapidation survey of minor roads not typically used by HGV traffic is included as a measure within the CTMP. Any damage to verges or carriageway surfaces caused by construction vehicles will be rectified to the satisfaction of the local highway authority. The preparation, approval and implementation of the final CTMP, substantially in accordance with the outline CTMP, are secured through Requirement 15 of Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring construction traffic impacts, including potential damage to local roads, are appropriately managed throughout the construction phase of the Scheme. The Scheme has been designed through an iterative design process to retain existing hedgerows and grassland habitats as far as practicable. Potential impacts on hedgerows are assessed in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]** and **ES Volume 1, Chapter 10 Arboriculture [APP-062]**, which consider baseline conditions and evaluate likely effects on hedgerow features during construction, operation and decommissioning. The assessments identify that some hedgerow loss is required to facilitate access and infrastructure. However, anticipated hedgerow losses represent a small proportion of the existing hedgerow network within the Order Limits. With embedded mitigation in place, no significant adverse effects on hedgerow features are anticipated. Compensatory planting and enhancement measures are proposed which will significantly exceed the extent of hedgerow loss. Proposed new hedgerows and habitat enhancements are illustrated in **ES Volume 2, Figure 3-4: Landscape and Ecological Mitigation Plan [APP-084]** and detailed in the

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]. The preparation, approval and implementation of the detailed Landscape and Ecological Management Plan, substantially in accordance with the **OLEMP [APP-283]**, are secured through Requirement 7 in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring hedgerow retention, replacement planting and long-term management are delivered and maintained throughout the lifetime of the Scheme. A detailed assessment of the likely significance of effects from the Scheme on the use and desirability of individual PRoW, and recreational access to the countryside, has been included in the **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** and **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]**. This assessment considers the impact on individual recreational routes – be that practically in their use, and their enjoyment and desirability. The Applicant confirms that the majority of significant adverse effects can be mitigated, however understands that some significant adverse effects to users of PROWs and unsurfaced roads in Lime Down E cannot be mitigated further during construction. No significant residual effects are anticipated during the operational phase of the Scheme. The Applicant notes that the assessment of PROW impacts and mitigation is under discussion with Wiltshire Council's Countryside Access Team and is set out in the Statement of Common Ground with Wiltshire Councilto be submitted at Deadline 1. The Applicant confirms that existing PRoW are to be controlled within the Scheme design with PRoW management strategies set out in the **Outline Public Rights of Way and Permissive Paths Management Plan (oPROWPPMP) [APP-282]**. These are confirmed as embedded mitigation measures in Section

Reference	Theme	Comments/Issues Raised	Applicant's Response
			16.9 of **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]**. New permissive access routes have been included in the Scheme design, shown as Work No.10 on the **Works Plan [APP-007]** and shown on **ES Volume 2, Figure 3-4: Landscape and Ecology Mitigation Plan [APP-283]**. These are considered as additional mitigation and enhancement measures in Section 16.11 of ES Chapter 16. The **oPROWPPMP [APP-282]**is secured through Requirement 16 of Schedule 2 of the **Draft DCO [APP-016]**. The preparation, approval and implementation of the detailed CEMP and CTMP, substantially in accordance with the outline plans, are secured through Requirements 13 and 15 respectively in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that impacts on PRoW and recreational routes are appropriately managed during construction.
OF-002	Landscape and Visual	Landscape - the obliteration of our countryside and agricultural land and vista's, all will be destroyed for years to come	An assessment of landscape and visual effects is provided in the Landscape and Visual Impact Assessment (LVIA) presented in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**. The LVIA assesses effects on identified landscape and visual receptors, including residential properties and users of public rights of way, and identifies where significant effects may occur. The LVIA found no significant long term visual effects to Residential Properties as a consequence of the Scheme. The scale of development within the Order Limits has been significantly reduced from the layout assessed in the Preliminary Environmental Information Report (PEIR) through an iterative design process undertaken in response to consultation and in accordance with the mitigation hierarchy to avoid, reduce and mitigate adverse effects. As part of this design evolution, panels along the edge of the Cotswolds National Landscape and along the Fosse Way have been removed.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Mitigation measures to address landscape and visual effects are set out in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**, Figure 3-4-1 to 3-4-5.2 **Landscape and Ecology Mitigation Plan [APP-084]** and detailed within the **Outline Landscape and Ecological Mitigation Plan (LEMP) [APP-283]** and the **Outline Ecological Protection and Mitigation Strategy (EPMS) [APP-284]**. These documents include proposals for new and enhanced planting, retention of existing hedgerows and woodland, and landscape integration measures to reduce visual effects over time. In addition, the Scheme design incorporates minimum offsets from existing landscape features, including residential properties, ancient woodland, woodland, hedgerows, public rights of way and watercourses, to further limit visual impacts. The preparation, approval and implementation of detailed landscape and ecological management plans, substantially in accordance with the **OLEMP [APP-283]** and **EPMS [APP-284]**, are secured through requirements in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that the identified mitigation measures are delivered and maintained throughout the lifetime of the Scheme. An assessment of the potential effects of the Scheme on soils and agricultural land is provided in **ES Volume 1, Chapter 17 Soils and Agriculture [APP-069]**. This chapter considers baseline agricultural land quality, including Best and Most Versatile (BMV) land, and assesses likely significant effects arising from construction, operation and decommissioning of the Scheme, together with embedded mitigation measures. The areas of each Agricultural Land Classification (ALC) grade affected by the Scheme are set out in **ES Chapter 17**, Section 17.7. Of the agricultural land within the Solar PV Sites, approximately 477.4 hectares (around 67%) is classified as Subgrade 3b or Grade 4 and is therefore not BMV land. There is no Grade 1 land, around 30.8 hectares (approximately 4%) of Grade 2 land, and approximately 209.3 hectares (around 29%)

Reference	Theme	Comments/Issues Raised	Applicant's Response
			of Subgrade 3a land. The distribution of ALC grades is shown in **ES Volume 2, Figure 17-2: Agricultural Land Classification Mapping [APP-172]**. The Applicant has had regard to agricultural land quality in the design and site selection process and has sought, where practicable, to locate infrastructure on lower quality land. The Scheme will result in a temporary but long-term and reversible loss of agricultural land for the operational life of the Scheme. As set out in **ES Chapter 17**, Section 17.10, this gives rise to a temporary, long-term moderate adverse effect on agricultural land overall, and a temporary, long-term major/moderate adverse effect on BMV land, both of which are assessed as significant. These effects are fully reported in the ES and are a matter for the Secretary of State to weigh in the planning balance against the need for the Scheme and its wider benefits. There are no significant permanent effects on agricultural land, as all land will be returned to its original use and condition as far as practicable following decommissioning. The Applicant notes that the approach to assessing the quality of the agricultural land is under further discussion with Natural England and is set out in the relevant **Statement of Common Ground** to be submitted at Deadline 1. Measures to avoid and minimise effects on soils and agricultural land are embedded within the Scheme design and secured through the DCO. These include the preparation and implementation of a **Soil Resources Management Plan (SRMP) [APP-280]**, which will control soil handling, storage and reinstatement during construction, operation and decommissioning, and a requirement to prepare and implement a Decommissioning Strategy in accordance with the **Outline Decommissioning Strategy [APP-279]**. Through the establishment and maintenance of long-term grassland beneath and between the solar arrays, soil health, quality and structure are anticipated to improve over the lifetime of the Scheme, resulting in a temporary, moderate beneficial

Reference	Theme	Comments/Issues Raised	Applicant's Response
			effect on soil resources at decommissioning, which is assessed as significant (**ES Chapter 17**, Sections 17.10 and 17.12).
OF-003	Socio-Economics, Tourism and Recreation	Quality of life - our livelihood, a stud farm breeding horses, will be under serious threat given the proven negative impact to the wellbeing of horses living in close proximity to solar sites	The equestrian facilities at Ladyswood Farm & Stud have been assessed as a specific receptor in **ES Volume 3 Appendix 16-2 Tourism and Recreation Receptor Tables [APP-241]**. During construction, a medium-term temporary moderate-minor adverse effect is anticipated, as a result of proximity to Solar PV Arrays, a construction compound, cabling works, and HGV traffic on access and hacking routes. The Applicant has sought to mitigate these as much as possible through removing Solar PV Array areas (fields designated B2-B4 and A11-A12), and embedding design, transport, and PROW mitigation into the Scheme ahead of DCO submission. This has included providing landscape screening around Solar PV infrastructure, siting the construction compound in B1 as far as practicable from the paddocks at Ladyswood Farm & Stud, providing banksmen and speed limits where accesses interact with PROWs, through specifying HGV access routes to the Scheme, and through ensuring PROWs are kept open as much as practicable through construction, and entirely during the operational phase of the Scheme. These measures are secured through the **Works Plan [APP-007]**, **Outline LEMP [APP-283]**, **Outline CEMP[APP-0277]**, **Outline CTMP [APP-287]** and **Outline PROWPPMP [APP-282]** by Requirements 5, 7, 13, 15, and 16 respectively in Schedule 2 to the **Draft DCO [APP-016]**. As a result, it is not anticipate that the effects on Ladyswood Farm & Stud are anticipated to be significant. This also applied to individually assessed PROWs around Ladyswood, which subject to implementation of mitigation are not anticipated to experience significant adverse effects at any phase of the Scheme.
OF-004	Hydrology, Flood Risk and Drainage	Flood Risks - our area floods badly during adverse weather - recently storm Claudia stranded cars on our lanes and this will only be increased with water flow running off the thousands of 4.5m panels	An assessment of the effects of the Scheme on flood risk both within the Site and the surrounding area is provided in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [APP-063]**, with supporting information provided in **ES Volume 3, Appendix 11-1 to 11-9: Flood Risk Assessment and Drainage Strategy [APP-210 to APP-218]**.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			The assessment concludes that, with the embedded mitigation measures secured, the Scheme would not result in a material increase in off-site flood risk, including to adjacent communities and downstream receptors, and that any on-site flood risk would be managed such that the Scheme remains safe and operable for its lifetime. The assessment has been prepared in accordance with national policy and best practice guidance and in consultation with the Environment Agency and Lead Local Flood Authority and is set out in the relevant Statement of Common Ground to be submitted at Deadline 1. The **Outline Construction Environmental Management Plan (Outline CEMP) [APP-277]** has been developed to control construction-phase risks and ensure there is no material increase in off-site flood risk. In accordance with NPS EN-3 (paragraph 2.10.84), the assessment differentiates between solar PV panel areas, which drain to the existing ground and therefore do not generally give rise to significant drainage effects, and associated infrastructure (for example access tracks, temporary construction compounds, substations and the BESS) where runoff controls are required. Where drainage measures are necessary, these include permeable surfacing, infiltration features, swales and attenuation storage to manage surface water and maintain greenfield runoff behaviour, as applicable. Requirement 13 in Schedule 2 to the **Draft DCO [APP-016]** secures that part of the authorised development can commence until, a CEMP is submitted to and approved by the relevant planning authority. The CEMP must be substantially in accordance with the Outline CEMP, and all construction works associated must be carried out in accordance with the approved CEMP.
OF-005	Site selection and Alternatives	Cable Route - the construction disruption and CPO's requiring access	The construction of the cable route has been assessed throughout the **ES [APP-052 to APP-265]**, which considers the

Reference	Theme	Comments/Issues Raised	Applicant's Response
		for the cable route to Melksham - this is so damaging to landowners involved under duress and is a frankly alarming distance to justify connecting the solar site to the grid - industrialising more of our beautiful area	likely significant construction effects associated with these works. The **ES [APP-052 to APP-265]** assesses the cable route within defined parameters, including limits on working width and trench dimensions, to ensure that a reasonable worst-case scenario is assessed. The detailed design and construction of the cable route would be undertaken within the parameters assessed and authorised by the DCO. Measures to manage and minimise construction effects, including reinstatement of land following installation, are set out in the **Outline Construction Environmental Management Plan (CEMP) [APP-277]**. Requirement 13 in Schedule 2 to the **Draft DCO [APP-016]** secures that part of the authorised development can commence until, a CEMP is submitted to and approved by the relevant planning authority. The CEMP must be substantially in accordance with the Outline CEMP, and all construction works associated must be carried out in accordance with the approved CEMP. **Requirement 13 in Schedule 2 to the Draft DCO [APP-016]** secures that part of the authorised development can commence until, a CEMP is submitted to and approved by the relevant planning authority. The CEMP must be substantially in accordance with the Outline CEMP, and all construction works associated must be carried out in accordance with the approved CEMP. The Applicant's goal is to deliver Lime Down Solar Park on land where the owner has voluntarily agreed to its use. Meaningful conversations with identified land interests have helped inform the design which in turn assists in avoiding people's land, including homes or gardens. As is standard in NSIP solar schemes, the **Draft Development Consent Order [APP-016]** includes provision for compulsory acquisition of land and rights but these are subject to controls and limitations. These powers sought are necessary and proportionate to ensure the deliverability of the Scheme.

Reference	Theme	Comments/Issues Raised	Applicant's Response
OF-006	Other Environmental Matters	Batteries - battery storage facilities and electrical substations scattered through the project will create fire hazards and irreversable industrialisation of agricultural areas	Potential environmental and safety effects associated with the Battery Energy Storage System (BESS), including fire risk, are assessed in **ES Volume 1, Chapter 20: Other Environmental Matters, Section 20.7: Major Accidents and Disasters [APP-072]**. This assessment considers credible worst-case accident scenarios and concludes that, with embedded mitigation and appropriate management measures, no significant adverse effects are anticipated. The Applicant notes that the approach to BESS safety is under discussion with Dorset & Wiltshire Fire & Rescue Service (D&WFRS) and is set out in the relevant **Statement of Common Ground** to be submitted at Deadline 1. An **Outline Battery Safety Management Plan (OBSMP) [APP-286]** has been submitted with the Application. The OBSMP confirms that a robust and validated Emergency Response Plan (ERP) will be developed at the detailed design stage in consultation with Dorset & Wiltshire Fire and Rescue Service. Section 5.4 of the OBSMP sets out the typical emergency response protocols, procedures and safety information that will be included in the ERP. The ERP will apply across all phases of the Scheme, including construction, operation and decommissioning. The potential effects of toxic gases arising from a BESS fire are assessed in **ES Volume 1, Chapter 15: Air Quality [APP-067]**, which models potential emissions and evaluates impacts on sensitive receptors within a 1 km radius of the BESS area, including residential properties and Public Rights of Way. The assessment concludes that no significant off-site air quality impacts are predicted should a fire event occur. In the unlikely event of a fire, the precautionary measures set out in the OBSMP — such as advice to remain indoors and close windows — would further reduce potential effects on nearby residents. On this basis, the Applicant considers that the Scheme incorporates appropriate safety and mitigation measures to

Reference	Theme	Comments/Issues Raised	Applicant's Response
			manage BESS-related risks and would not give rise to significant adverse environmental or safety effects.
OF-007	Site selection and Alternatives	Suitability - we are all pro green energy and solar in the RIGHT place but it is very difficult to see any positive angle as to why these proposed sties can be considered suitable for solar on such a large and damaging scale. Agricultural land and beautiful landscapes, local walks and rides, historic areas and beautiful quaint villages surely cannot be considered as apporiate to destroy I cannot see how this project has been proposed in such an inappropriate area, the last thing it should be considered for is mass industrialisation for off shore gain - our beautiful countryside would be lost forever	National Policy Statement EN-3 Paras 2.10.11 and 2.10.18 explain that the availability of grid connection, suitable irradiance levels, and local topography are key inputs to the selection of sites suitable for large-scale solar generation developments. The number of locations within the UK at which large-scale solar generation is suitable is therefore likely to be limited, and this is a material issue when considering how the UK is to meet the urgent need for low carbon generation as is set out in the NPSs. This point is expanded upon in the **Statement of Need [APP-266]** in particular in Section 4.3. Chapter 8 of the **Statement of Need [APP-266]** provides evidence to support the suitability of the proposed location of the Scheme for large-scale solar plus storage in relation to the timeliness and availability of the grid connection, transmission system operability and the decarbonisation and energy security benefits the Scheme will bring forward from this location. As set out in **ES Volume 1, Chapter 4 Alternatives and Design Evolution [APP-056]** and the Site Selection Assessment Report at **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]** an appraisal of alternative sites within a 20km radius of the Existing National Grid Melksham Substation has been undertaken, which concludes that there are no more suitable locations within the 20km search area than the proposed location for the Scheme. The Applicant notes that matters relating to the use of agricultural land and visual impact have been addressed in the Applicant's responses to this Party above. A detailed assessment of the likely significance of effects from the Scheme on the use and desirability of individual PRoW, and recreational access to the countryside, has been included in the **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** and **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]**. This

Reference	Theme	Comments/Issues Raised	Applicant's Response
			assessment considers the impact on individual recreational routes – be that practically in their use, and their enjoyment and desirability. The Applicant confirms that the majority of significant adverse effects can be mitigated, however understands that some significant adverse effects to users of PROWs and unsurfaced roads in Lime Down E cannot be mitigated further during construction. No significant residual effects are anticipated during the operational phase of the Scheme. The Applicant notes that the assessment of PROW impacts and mitigation is under discussion with Wiltshire Council's Countryside Access Team and is set out in the Statement of Common Ground with Wiltshire Council to be submitted at Deadline 1. The Applicant confirms that existing PRoW are to be controlled within the Scheme design with PRoW management strategies set out in the **Outline Public Rights of Way and Permissive Paths Management Plan (PROWPPMP) [APP-282]**. These are confirmed as embedded mitigation measures in Section 16.9 of ES Chapter 16. New permissive access routes have been included in the Scheme design, shown as Work No.10 on the **Works Plan [APP-007]** and shown on **ES Volume 2, Figure 3-4: Landscape and Ecology Mitigation Plan [APP-283]**. These are considered as additional mitigation and enhancement measures in Section 16.11 of ES Chapter 16. The PRoW and Permissive Paths MP is secured through Requirement 16 of Schedule 2 of the **Draft DCO [APP-016]**. The preparation, approval and implementation of the detailed CEMP and CTMP, substantially in accordance with the outline plans, are secured through Requirements 13 and 15 respectively in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that impacts on PRoW and

Reference	Theme	Comments/Issues Raised	Applicant's Response
			recreational routes are appropriately managed during construction. The potential effects of the Scheme on cultural heritage, including archaeological assets dated to the Roman and medieval periods, are fully assessed in **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, supported by detailed technical appendices in **ES Volume 3, Appendices 12-1 to 12-7 [APP-219 to APP-231]**. The chapter considers baseline conditions, identifies built and archaeological heritage assets within the study area, and assesses likely effects during construction, operation and decommissioning, including effects on setting. The chapter concluded that, following mitigation, the residual effects on any archaeological assets including Roman and medieval period remains, would be neutral/negligible and therefore not significant (see **Volume 3, Appendix 12-8 Cultural Heritage Impact Assessment Tables [APP-232]**). The assessment is underpinned by extensive desk-based research, geophysical survey and evaluation trenching, as detailed in **ES Volume 3, Appendix 12-2: Archaeological Desk-Based Assessments [APP-220], Appendix 12-4: Archaeological Geophysical Survey Reports [APP-224], and Appendix 12-5: Interim Evaluation Trial Trenching Reports [APP-225].** The Applicant notes that the approach to the assessment has been agreed with Wiltshire Council and the methodology for the mitigation strategy is under discussion with Wiltshire Council and is set out in the relevant **Statement of Common Ground**to be submitted at Deadline 1. Embedded mitigation measures to avoid or reduce harm to heritage assets are set out in Section 12.9 of **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, with additional mitigation measures detailed in Section 12.11. An overarching archaeological mitigation strategy is provided in **ES Volume 3, Appendix 12-6: Outline Archaeological Mitigation Strategy [APP-230]**, which sets out the framework for further

Reference	Theme	Comments/Issues Raised	Applicant's Response
			archaeological investigation, recording and protection where ground disturbance cannot be avoided. The preparation, approval and implementation of detailed archaeological Written Schemes of Investigation, substantially in accordance with the Outline Archaeological Mitigation Strategy, are secured through Requirement 12 of Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that appropriate protection, recording and mitigation are delivered before and during construction.

6.57 Vanessa Shipp

Table 6-57 RR-4814

Reference	Theme	Comments/Issues Raised	Applicant's Response
VS-001	Cultural Heritage	Objection to the Proposed Lime Down Solar Park in Grittleton I wish to register my strong objection to the proposed Lime Down Solar Park in the village of Grittleton. While the transition to renewable energy is important, this particular development is wholly inappropriate for its chosen location and poses significant harm to the character, heritage, environment, businesses, and infrastructure of our community.	National Policy Statement EN-3 Paras 2.10.11 and 2.10.18 explain that the availability of grid connection, suitable irradiance levels, and local topography are key inputs to the selection of sites suitable for large-scale solar generation developments. The number of locations within the UK at which large-scale solar generation is suitable is therefore likely to be limited, and this is a material issue when considering how the UK is to meet the urgent need for low carbon generation as is set out in the NPSs. This point is expanded upon in the **Statement of Need [APP-266]** in particular in Section 4.3. Chapter 8 of the **Statement of Need [APP-266]** provides evidence to support the suitability of the proposed location of the Scheme for large-scale solar plus storage in relation to the timeliness and availability of the grid connection, transmission system operability and the decarbonisation and energy security benefits the Scheme will bring forward from this location. As set out in **ES Volume 1, Chapter 4 Alternatives and Design Evolution [APP-056]** and the Site Selection Assessment Report at **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]** an appraisal of alternative sites within a 20km radius of the Existing National Grid Melksham Substation has been undertaken, which concludes that there are no more suitable locations within the 20km search area than the proposed location for the Scheme. The Applicant acknowledges that there will be impacts on the community as a result of the Scheme, which may be a source of concern for local residents. The Secretary of State will balance those potential impacts and changes against the urgent need and critical national priority for the Scheme as set out in Government policy. The Applicant has assessed adverse impacts arising from the Scheme and has also set out within the **ES [APP-052 – APP-065]** the steps taken to avoid, mitigate and minimise these impacts as far as possible, and has prepared a number of management plans that will ensure that impacts are kept to a minimum. These management plans are secured in the **Draft Development Consent Order [APP-016]**.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Of particular relevance to the assessment of effects on local communities are **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**, **Chapter 13: Transport and Access [APP-065]**, **Chapter 14: Noise and Vibration [APP-066], Chapter 15: Air Quality [APP-067]**, **Chapter 16: Socioeconomics, Tourism and Recreation [APP-068]**, **and Chapter 18: Human Health [APP-070]**, all of which consider potential impacts on residential properties and local communities.
VS-002	Landscape and Visual	An Area of Outstanding Natural Beauty Grittleton sits within an area recognised for its exceptional rural landscape. The sweeping views, open farmland, and historic character are precisely what the Area of Outstanding Natural Beauty (AONB) designation seeks to protect. A large-scale industrial solar installation would create a permanent visual scar on this landscape, undermining the very qualities that make the area special.	An assessment of landscape and visual effects is provided in the Landscape and Visual Impact Assessment (LVIA) presented in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**. The LVIA assesses effects on identified landscape and visual receptors, including residential properties and users of public rights of way, and identifies where significant effects may occur. The LVIA found no significant long term visual effects to Residential Properties as a consequence of the Scheme. The scale of development within the Order Limits has been significantly reduced from the layout assessed in the Preliminary Environmental Information Report (PEIR) through an iterative design process undertaken in response to consultation and in accordance with the mitigation hierarchy to avoid, reduce and mitigate adverse effects. As part of this design evolution, panels along the edge of the Cotswolds National Landscape and along the Fosse Way have been removed. Mitigation measures to address landscape and visual effects are set out in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**, Figure 3-4-1 to 3-4-5.2 **Landscape and Ecology Mitigation Plan [APP-084]** and detailed within the **Outline Landscape and Ecological Mitigation Plan (LEMP) [APP-283]** and the **Outline Ecological Protection and Mitigation Strategy (OEPMS) [APP-284]**. These documents include proposals for new and enhanced planting, retention of existing hedgerows and woodland, and landscape integration measures to reduce visual effects over time.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			In addition, the Scheme design incorporates minimum offsets from existing landscape features, including residential properties, ancient woodland, woodland, hedgerows, public rights of way and watercourses, to further limit visual impacts. The preparation, approval and implementation of detailed landscape and ecological management plans, substantially in accordance with the **OLEMP [APP-283]** and **EPMS [APP-284]**, are secured through requirements in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that the identified mitigation measures are delivered and maintained throughout the lifetime of the Scheme.
VS-003	Cultural Heritage	Historic Environment & Listed Properties Most properties in Grittleton are listed or sit within designated conservation areas. These protections exist because the village holds significant architectural and historic value. Planning laws in such areas are deliberately strict to prevent inappropriate or harmful development. Installing an industrial solar park here directly conflicts with the principles of conservation and heritage protection, and would fundamentally alter the setting of these historic buildings. Impact on [REDACTED] (Grade II* Listed) As the owners of [REDACTED], a Grade II* listed property at the heart of the village, we feel this development would have a severe and lasting impact on both our business and the heritage value of the estate. The proposed	**ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, supported by **Appendix 12.1: Heritage Statement [APP-219]**, has assessed the potential impact of the scheme on Grittleton Conservation Area. The cable route corridor is proposed to pass to the east of Grittleton Conservation Area (Fields F107-F114). While the Scheme will comprise temporary and localised construction activity as part of the installation of cabling, the assessment identified that will be no impact to the character and appearance of Grittleton Conservation Area. Since the design presented at PEIR stage, Field C26, the westernmost part of Field C25, and the majority of Field C13 have been entirely removed from the Order Limits. Solar PV Panels have also been removed entirely from within Fields B1-B5, C24-C25, and C13. A number of fields abutting the Fosse Way within which Solar PV Panels will be erected have had offsets established with their boundaries with Fosse Way, including Fields B6, C10-C12, and C22-C23. **Appendix 12.1: Heritage Statement [APP-219]** identified that the overall setting and significance of the Fosse Way will remain intact, and the asset will retain its legibility as a roadway within a largely agrarian landscape. Consequently no significant effects were identified to the asset.

Reference	Theme	Comments/Issues Raised	Applicant's Response
		compound will be in full view from [REDACTED], meaning that guests, visitors, and wedding parties-"*who come specifically for the unspoilt historic setting*-"will face a large industrial installation dominating the landscape. [REDACTED] is not only a significant heritage asset but also a vital anchor for the village. As a thriving business and community hub, any decline in its appeal or viability would have a profound negative effect on the wider local economy. The presence of a solar compound would be a substantial eyesore and could jeopardise the long-term sustainability of the house.	
VS-004	Ecology and Biodiversity	Wildlife & Ecological Impact The proposed site is home to a wide variety of wildlife, including protected species whose habitats could be destroyed or severely disrupted. Solar farms introduce extensive fencing, cabling, and land disturbance, fragmenting habitats and limiting movement for animals. This is especially concerning in a rural area where interconnected ecosystems are vital for biodiversity.	Potential impacts on ecology and biodiversity are fully assessed in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**. This assessment considers baseline ecological conditions and evaluates likely significant effects arising during the construction, operation and decommissioning phases of the Scheme. It identifies avoidance, mitigation and enhancement measures to address potential impacts on habitats and protected and notable species. It also identifies opportunities for ecological enhancement, including the creation and long-term management of habitats, and delivery of biodiversity net gain. The assessment concludes that, with the identified embedded and additional mitigation measures in place, no unacceptable significant adverse effects on ecology and biodiversity are anticipated. The Applicant notes that the approach to the assessment in relation to ecology and biodiversity in general is under discussion with Wiltshire Council and Natural England and is set out in the relevant **Statements of Common Ground**to be submitted at Deadline 1. During construction, specific measures are proposed to avoid

Reference	Theme	Comments/Issues Raised	Applicant's Response
			disturbance and displacement of wildlife. These include protective buffers around sensitive habitats and features, timing restrictions on vegetation clearance, pre-construction ecological surveys, species-specific mitigation, and pollution prevention controls which are set out in the **Outline Ecological Protection and Mitigation Strategy (EPMS) [APP-284]**. Measures to protect trees and hedgerows are also set out in **ES Volume 1, Chapter 10 Arboriculture [APP-062]**. The Scheme will also result in the cessation of intensive arable farming within the Solar PV Sites. As identified in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**, this is expected to reduce the ongoing application of herbicides and pesticides, supporting improvements in habitat quality over the operational lifetime of the Scheme. The reversion of existing arable land within the Solar PV Sites to predominantly grassland habitats can be expected to benefit a wide range protected and notable species, as identified in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**. Mitigation and enhancement measures are detailed in the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]** and the **Outline Ecological Protection and Mitigation Strategy (OEPMS) [APP-284]**, which set out habitat creation, species protection measures, buffer zones and long-term ecological management. The preparation, approval and implementation of the detailed Landscape and Ecological Management Plan, substantially in accordance with the **OLEMP [APP-283]**, are secured through Requirement 7 in Schedule 2 of the **Draft Development Consent Order [APP-016]**. The preparation, approval and implementation of the detailed Ecological Protection and Mitigation Strategy, substantially in accordance with the O**EPMS [APP-284]**, are secured through Requirement 8 in Schedule 2 of the **Draft Development Consent Order [APP-016]**. These requirements ensure that ecological protection and enhancement

Reference	Theme	Comments/Issues Raised	Applicant's Response
			measures are delivered and maintained throughout construction and operation of the Scheme.
VS-005	Cultural Heritage	The Fosse Way - An Ancient Roman Road The Fosse Way is not merely a local footpath-"it is an important archaeological and historical asset dating back to Roman Britain. Any development near this ancient route risks disturbing archaeology, damaging the historic landscape, and diminishing the cultural significance of this unique heritage feature.	The potential effects of the Scheme on the cultural heritage of the Fosse Way and associated Roman archaeological assets are fully assessed in **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, supported by detailed technical appendices in **ES Volume 3, Appendices 12-1 to 12-7 [APP-219 to APP-231]**. The assessment identifies known Roman heritage assets, considers their significance, and evaluates likely effects during construction, operation and decommissioning, including effects on setting. **Appendix 12.1: Heritage Statement [APP-219]** identified that the overall setting and significance of the Fosse Way will remain intact, and the asset will retain its legibility as a roadway within a largely agrarian landscape. Consequently, no significant effects were identified to the asset. Since the design presented at PEIR stage, Field C26, the westernmost part of Field C25, and the majority of Field C13 have been entirely removed from the Order Limits. Solar PV Panels have also been removed entirely from within Fields B1-B5, C24-C25, and C13. A number of fields abutting the Fosse Way within which Solar PV Panels will be erected have had offsets established with their boundaries with Fosse Way, including Fields B6, C10-C12, and C22-C23. **Appendix 12.1: Heritage Statement [APP-219]** identified that the overall setting and significance of the Fosse Way will remain intact, and the asset will retain its legibility as a roadway within a largely agrarian landscape. Consequently, no significant effects were identified to the asset. Embedded mitigation measures to avoid or reduce harm to heritage assets are set out in Section 12.9 of **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, with additional mitigation detailed in Section 12.11. An overarching archaeological mitigation strategy is provided in **ES Volume 3, Appendix 12-6: Outline Archaeological Mitigation Strategy [APP-230]**.

Reference	Theme	Comments/Issues Raised	Applicant's Response
VS-006	Transport and Access	Unsuitable Rural Roads & Vehicle Impact Grittleton's narrow rural lanes were never designed to accommodate the heavy goods vehicles, construction machinery, and frequent lorry traffic required for a development of this scale. Increased traffic poses serious safety risks for residents, walkers, cyclists, and horse riders. It would also lead to deterioration of the road surfaces, congestion, and noise disruption in an otherwise peaceful village.	The capacity of local roads and infrastructure to accommodate construction vehicles is assessed in **ES Volume 1, Chapter 13: Transport and Access [APP-065]**, which considers construction traffic volumes, vehicle types, route suitability and network performance. The assessment concludes that, with appropriate mitigation in place, there would be no significant adverse impacts on the local highway network. Supporting technical information is provided in **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]**, which identifies specific locations where traffic management measures or passing arrangements may be required on narrower sections of construction routes. The assessment presented in Annex H of **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]** demonstrates adequate carriageway width or frequency of passing place opportunity to pass at least an HGV and a light vehicle as requested in comments provided by Wiltshire Council. All construction routes also include passing points to allow two HGVs to pass. Mitigation measures to manage construction traffic are set out in the **Outline Construction Traffic Management Plan (CTMP) [APP-287]**. The CTMP is designed to minimise the effects of construction traffic on local roads and includes measures for vehicle routing, delivery scheduling and liaison with the local highway authority. A road condition and dilapidation survey of minor roads not typically used by HGV traffic is included as a measure within the CTMP. Any damage to verges or carriageway surfaces caused by construction vehicles will be rectified to the satisfaction of the local highway authority. The potential effects of construction traffic on highway safety and accident risk are assessed in **ES Volume 1, Chapter 13: Transport and Access [APP-065]**, which considers changes in

Reference	Theme	Comments/Issues Raised	Applicant's Response
			traffic flows, HGV movements and accident risk on the local road network. Links experiencing traffic increases above defined assessment thresholds were taken forward for detailed analysis. Supporting technical evidence is provided in **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]**, which includes an assessment of baseline accident data and predicted changes in collision risk arising from construction traffic. The assessment concludes that the level of construction traffic associated with the Scheme is unlikely to materially affect road safety on links within the Study Area, and no significant adverse effects on accident risk are anticipated. Mitigation measures to manage construction traffic safely are set out in the **Outline Construction Traffic Management Plan [APP-287]**, which includes defined vehicle routing, delivery scheduling and coordination with the local highway authority. The noise effects associated with construction traffic are assessed in **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**, which considers noise from construction vehicles, HGV movements and associated changes in traffic flows on the local road network. Supporting technical information is provided in **ES Volume 3, Appendix 14-4: Noise Modelling [APP-237]**. The assessment concludes that, with embedded mitigation in place, noise effects from construction traffic would be negligible or low in magnitude and no significant adverse effects are predicted. The Applicant notes that the approach to construction noise and vibration has been discussed with Wiltshire Council, as described in Section 14.2 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**. Mitigation measures to manage construction traffic and minimise associated noise are set out in the **Outline Construction Traffic**

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Management Plan (Outline CTMP) [APP-287], which includes defined vehicle routing, delivery scheduling and coordination with the local highway authority to reduce impacts on sensitive receptors. The preparation, approval and implementation of the final CTMP, substantially in accordance with the **Outline CTMP [APP-287]** are secured through Requirement 15 of Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring construction traffic impacts on local roads and infrastructure are appropriately managed throughout the construction phase of the Scheme.
VS-007	Community Benefits	Energy Not Used Locally - No Community Benefit One of the most troubling aspects of the proposal is that the energy generated will not benefit Grittleton or its surrounding villages. Local residents would bear the environmental and visual cost without receiving any meaningful advantage in return. A development that provides no local energy security or economic benefit cannot be justified when the impact is so high.	The Applicant acknowledges that any adverse effects from the Scheme are more likely to be felt locally than the largely wider-scale benefits of the Scheme. The Scheme is anticipated to help meet the UK's net zero requirements for energy production, which is considered a critical national priority and set out in National Policy Statements for Energy NPS EN-1 (section 4.2) and EN-3. This therefore will benefit the national population rather than just the local population. The Scheme is also anticipated to benefit the population within approximately 20km of the Scheme, through providing employment and income especially during construction and peak replacement activities, and providing skills and training opportunities. Where the Scheme is anticipated to benefit local people more specifically, this is done through providing onsite permissive paths to increase access to the countryside, providing improved landscape planting through reinforcing existing hedgerows and planting of new trees, providing biodiversity net gains through habitat improvements. That notwithstanding, the Applicant is committed to providing a Community Benefit Fund to allow for community-driven benefits that are not necessarily associated with the Scheme itself. The purpose is to establish a means to recognise local community

Reference	Theme	Comments/Issues Raised	Applicant's Response
			needs that the Applicant wants to be able to contribute towards in recognition of the local impact of the Scheme. The Community Benefit Fund is separate from the DCO process, and so is not bound to the same timescales or information requirements as submitted information. Furthermore, community benefits are legally immaterial to planning decisions and cannot be considered when deciding whether to grant planning consent. The Applicant acknowledges this and so has sought to provide the Community Benefit Fund voluntarily even though it won't add favourable weight in the planning balance.
VS-008	Landscape and Visual	Industrialisation of a Rural Landscape Solar farms of this size introduce industrial infrastructure-"metal panels, security fencing, lighting, substations, and service buildings. This is entirely at odds with the character of a rural, heritage-rich landscape. Once lost, the countryside cannot be restored to its former state.	The Applicant notes that visual impact has been responded to in detail in the Applicant's responses to this Party above. The effects of decommissioning on soils and agricultural land are assessed in **ES Volume 1, Chapter 17 Soils and Agriculture [APP-069]**. As stated in this chapter, all land will be returned to its original use and condition as far as practicable and returned to the landowner. The effect on agricultural land quality at decommissioning would be influenced by the extent of disturbance caused by the removal of the Solar PV Panels, for example the presence and dimensions of leftover voids or the depth of the remaining underground cables. Currently, the most environmentally acceptable option is to leave the cables in-situ, although the cables could be removed by excavating at regular intervals and pulling the cable through to the extraction point, thus avoiding the need to excavate the entire cable trench. In either case, the effects would be less than those likely to occur during the construction phase. Built aspects of the Scheme such as the BESS Area and substations are also subject to the proposal to return the land to its original use and condition, which is primarily agricultural land of Subgrade 3b quality, with some Subgrade 3a at the BESS Area. Measures to manage decommissioning and reinstatement are set out in the **Outline Decommissioning Strategy [APP-279]**, which has been submitted as part of the DCO Application. The

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Decommissioning Strategy will include robust methodologies and control points to avoid contamination of the underlying land with physical or chemical contaminants and will be applied in conjunction with the Soil Resources Management Plan (SRMP) in order to promote successful reinstatement. A detailed Decommissioning Strategy will be prepared substantially in accordance with the **Outline Decommissioning Strategy [APP-279]** and must be submitted to and approved by the relevant local planning authority prior to the commencement of decommissioning. This is secured through Requirement 20 in Schedule 2 of the **Draft Development Consent Order [APP-016]**. In addition, the Applicant is seeking a time-limited consent for the Scheme to have an operational period of 60 years, with decommissioning to take place following cessation of operation. This is secured by Requirement 20 in Schedule 2 of the **Draft DCO [APP-016]**.
VS-009		Precedent for Further Development Approving this project would set a dangerous precedent for further industrial or large-scale energy developments in the area. This undermines the long-term preservation of both the AONB and the village's historical identity.	Each Development Consent Order application must be determined on its own merits, having regard to the relevant National Policy Statements and the specific environmental effects identified in the Environmental Statement. The determination of this Scheme would not automatically set a precedent for other developments, as any future proposals would be subject to their own separate assessment, consultation and examination under the Planning Act 2008.
VS-010	Climate Change and Energy Need	While renewable energy is vital, it must be pursued responsibly and in locations where it does not irreversibly damage landscapes, heritage, wildlife, or community wellbeing. The proposed Lime Down Solar Park is wholly incompatible with the protected and historically significant environment of Grittleton. It threatens local businesses-"including [REDACTED]-"disrupts the AONB, and offers no meaningful benefit to the community.	The Applicant notes that matters relating to landscape and visual impact, heritage and wildlife have been addressed in detail in the Applicant's responses above. Impacts on mental health and wellbeing are assessed in **ES Volume 1, Chapter 18: Human Health [APP-070]**. This chapter provides a comprehensive assessment of the Scheme's potential effects on human health, including mental health and wellbeing, through consideration of a broad range of health determinants. These include access to open space and recreation, transport and connectivity, community identity and cohesion, employment and income, noise and vibration, air quality, and access to health

Reference	Theme	Comments/Issues Raised	Applicant's Response
			and social care services. The assessment applies a health "lens" to the findings of relevant technical chapters and concludes that, with the embedded mitigation and additional measures secured through the relevant management plans **[APP-277** to **APP-287]** secured by their respective requirements in Schedule 2 to the **Draft DCO [APP-016]**, the Scheme would not give rise to significant adverse effects on population health, including mental health and wellbeing. Mitigation measures include (but are not limited to) ensuring PROWs remain open as much as is practicable, HGV movements are set to defined routes and within set hours, community liaison and engagement is maintained, and construction impacts on noise and air quality are regulated. With specific regard to community liaison, this is directly secured through Requirement 4 in Schedule 2 to the **Draft DCO [APP-016]** through the provision of a community liaison group. This group will act as an intermediary between the public and the onsite contractors to ensure community concerns and any information they need are communicated and responded to, so as to reduce community anxiety and impacts on mental wellbeing, and to assist in directing the public to mental health support if required. The assessment in **ES Volume 1, Chapter 18: Human Health [APP-070]** focuses on communities within a 2 km Study Area surrounding the Scheme, identified as those most likely to experience potential health-related effects. Baseline analysis demonstrates that rates of poor mental health within the Study Area are generally lower than national averages, and the assessment considers potential pathways by which the Scheme could influence mental wellbeing, including changes to environment, amenity, access and community factors. Residual effects of the Scheme on health following mitigation are assessed as not significant at any phase of the Scheme. Consultation with Wiltshire Council's Public Health Team has informed the approach to mental health considerations, as

Reference	Theme	Comments/Issues Raised	Applicant's Response
			documented in **ES Volume 3, Appendix 18-1: Human Health Consultation [APP-244].** Through this engagement, the Applicant has committed to signposting locally available mental health and wellbeing resources to members of the public engaging with the Scheme, using information provided by Wiltshire Council's Public Health Team. The Applicant will continue to monitor consultation responses relating to mental health and will provide appropriate signposting to existing local support services where requested. The Applicant notes that the assessment methodology for health and wellbeing has been agreed with Wiltshire Council's Public Health team and is set out in the relevant Statement of Common Ground to be submitted at Deadline 1. An assessment of the likely effects of the Scheme on the local economy and employment is provided in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]**. This chapter considers potential impacts on construction and engineering sectors, agricultural activity, tourism-related businesses, and wider local economic conditions during construction, operation and decommissioning. Supporting evidence is provided in **ES Volume 3, Appendix 16-3: Socio-Economics, Tourism and Recreation – Summary of Non-Significant Effects [APP-242]**, which summarises that effects on the local economy and economic prosperity are assessed as negligible to minor beneficial, with construction expenditure and employment generation contributing positive, temporary effects on local economic activity. The assessment therefore concludes that the Scheme would not result in significant adverse effects on local businesses or the wider local economy, and that socio-economic benefits, including job creation and local supply-chain opportunities, are expected during the construction phase, with more modest economic and skills and supply chain opportunities during the operational phase.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			The Applicant notes that the approach to assessment of socio-economic effects has been agreed with Wiltshire Council's Economic and Regeneration Team, with the exception of matters relating to agricultural employment, which the Applicant is discussing with the team. This is set out in the Statement of Common Ground with Wiltshire Council.
VS-011	Description and DCO Process	I urge planners to reject this application and to prioritise solutions that respect both the needs of the environment and the communities who live within it.	The Applicant notes that the matters raised have been addressed in detail in the Applicant's responses above.

6.58 Tim Reynolds

Table 6-58 RR-4707

Reference	Theme	Comments/Issues Raised	Applicant's Response
TR-001	Landscape and Visual	I object to this development, this is going to destroy a massive area of beautiful countryside.	The Applicant is confident that the proposed management and mitigation measures set out in the **ES [APP-052 to APP-265]** are comprehensive and robust and that the Scheme aligns with national and local planning policy; this is outlined in the **Planning Statement [APP-267]**. Of particular relevance are Annex A: National Policy Statement Accordance Tables and Annex B: Local Policy Accordance Tables, of the Planning Statement which set out an appraisal of the Scheme against the policies.

6.59 Jason Clark

Table 6-59 RR-2186

Reference	Theme	Comments/Issues Raised	Applicant's Response
JC-001	Landscape and Visual Transport and Access	This project will have significant detriment to my family's life within the village of Grittleton. There will be significant increase in traffic flow during the build stage, causing damage to or way of life and danger to the community. In addition the use of rural land within an AONB for a solar farm is the most brutal and ridiculous strategy which will blight nature and the area for years to come. This has to be stopped!	Transport and Access The potential effects of construction traffic on the local highway network are assessed in **ES Volume 1, Chapter 13: Transport and Access [APP-065],** which considers construction vehicle movements, traffic volumes, road safety and effects on road users. This included the capacity of local roads and infrastructure to accommodate construction vehicles with consideration of construction traffic volumes, vehicle types, route suitability, and network performance. The assessment concludes that the level of construction traffic associated with the Scheme is unlikely to materially affect road safety on links within the Study Area, and no significant adverse effects on accident risk are anticipated. The assessment additionally concludes that with appropriate mitigation such as the Construction Traffic Management Plan in place to manage construction vehicle movements, there would be no significant adverse impacts on the local highway network during the construction, operation maintenance, and decommissioning phases of the Scheme. An **Outline Construction Traffic Management Plan (Outline CTMP) [APP-287]** has been prepared and submitted with the DCO application. The aim of the CTMP is to ensure that the effect of the construction phase on the local highway network is minimised. The **Outline CTMP [APP-287]** sets out measures to coordinate construction deliveries by HGVs to arrive and depart between 09:30 and 16:30 where possible, to avoid peak network hours of 08:00–09:00 and 17:00–18:00. It also includes a community liaison element to keep local communities informed about the construction process and to provide a contact for feedback should any issues arise. Compliance with the CTMP will be monitored by the Developer, Contractor and Wiltshire Council as local highway authority.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			A road condition and dilapidation survey of minor roads not typically used by HGV traffic is included as a measure within the **Outline CTMP [APP-287]**. Any damage to verges or carriageway surfaces caused by construction vehicles will be rectified to the satisfaction of the local highway authority. The potential effects of construction traffic on highway safety and accident risk are assessed in **ES Volume 1, Chapter 13: Transport and Access [APP-065]**, which considers changes in traffic flows, HGV movements and accident risk on the local road network. Links experiencing traffic increases above defined assessment thresholds were taken forward for detailed analysis. Supporting technical evidence is provided in **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]**, which includes an assessment of baseline accident data and predicted changes in collision risk arising from construction traffic. The assessment concludes that the level of construction traffic associated with the Scheme is unlikely to materially affect road safety on links within the Study Area, and no significant adverse effects on accident risk are anticipated. The preparation, approval and implementation of the final CTMP, substantially in accordance with the **Outline CTMP [APP-287]**, are secured through Requirement 15 of Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring construction traffic impacts are appropriately managed throughout the construction phase of the Scheme. <u>The Cotswolds National Landscape</u> The Cotswolds National Landscape (CNL) (formally AoNB) is fully assessed as a standalone receptor within **ES Volume 3, Appendix 8.6: Assessment of Effects on the Special Qualities of the Cotswolds National Landscape [APP-197]**. This assessment considers the effects of the Scheme on

Reference	Theme	Comments/Issues Raised	Applicant's Response
			landscape character, visual amenity and the special qualities of the CNL, including tranquillity. The assessment found that there would be some short term impact to landscape character within the setting of the CNL but due to the avoidance measures embedded within the Scheme, harm to the CNL itself would be minimal with beneficial effects in the long term which would further the purposes of the designation. In respect of visual amenity, some short-term adverse effects would be experienced by a small number of visual receptors with views to and from the CNL. However, these would reduce over time as a result of the proposed mitigation. The assessment of effects on the special qualities of the CNL scoped out 3 SQs as there is no association with the Site. The assessment found that there are no direct effects on the remaining SQs. There are some Minor/ Negligible short-term effects on a small number of visual receptors within the setting of the CNL which effect SQ7 -Tranquillity and SQ13 Archaeology and historic associations. However, these effects are mitigated by Year 15 when proposed vegetation has matured. The assessment also found that there would be beneficial effects on SQ 6 – Biodiversity and nature recovery as a result of the delivery of approximately 119.7 hectares of flower-rich neutral grassland (as defined in the BNG assessment) and SQ 12 - An accessible landscape as a result of the delivery of approximately 12.8km of new permissive paths within the setting of the CNL. The remaining SQs would remain entirely intact. The Scheme was refined through an iterative design process to avoid and reduce effects on the CNL and its setting. Panels along the edge of the CNL were removed from the Order Limits in fields C2, C3 and C4 where significant visual effects on receptors within the CNL were identified. Panels were also removed from fields C1, C6, C8, the western section of C9 and the majority of C10, with this land now proposed for ecological mitigation to protect the setting of the CNL. In addition, panels within fields A11 and A12 were removed and the land repurposed for ecological mitigation to protect the setting of the CNL towards

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Sherston. All land parcels adjacent to the CNL are proposed to deliver habitat enhancement, informed by the CNL Management Plan and the Cotswolds National Landscape Strategy and Guidelines, to further the purposes of the designation. Details of the proposed landscape and ecological mitigation and enhancement measures are provided in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**, Figure 3-4-1 to 3-4-5.2 **Landscape and Ecology Mitigation Plan [APP-084]** and the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]**, and the **Outline Ecological Protection and Mitigation Strategy (EPMS) [APP-284]**. The preparation, approval and implementation of the detailed Landscape and Ecological Management Plan, substantially in accordance with the **OLEMP [APP-283]**, are secured through Requirement 7 in Schedule 2 of the **Draft Development Consent Order [APP-016]**. The preparation, approval and implementation of the detailed Ecological Protection and Mitigation Strategy, substantially in accordance with the **EPMS [APP-284]**, are secured through Requirement 8 in Schedule 2 of the **Draft Development Consent Order [APP-016]**. These requirements ensure that the identified mitigation and enhancement measures are delivered and maintained throughout the lifetime of the Scheme. The Applicant is confident that the proposed management and mitigation measures set out in the **ES [APP-052 to APP-265]** are comprehensive and robust and that the Scheme aligns with national and local planning policy; this is outlined in the **Planning Statement [APP-267]**. Of particular relevance are Annex A: National Policy Statement Accordance Tables and Annex B: Local Policy Accordance Tables, of the Planning Statement which set out an appraisal of the Scheme against the policies.

6.60 Sir Michael Edward Pitt

Table 6-60 RR-4397

Reference	Theme	Comments/Issues Raised	Applicant's Response
SMEP-001	Landscape and Visual Socio-Economics, Tourism and Recreation	Approximately 30 years ago we purchased our home known as [REDACTED]. We sold our house in Kent and, after very careful consideration, chose to retire to the Cotswolds. The reasons for choosing the Cotswolds above all other possible locations were the beauty and tranquility of the landscape. This area lived up to all of our expectations until Island Green Power (IGP) announced their proposals to develop Lime Down Solar Park (LDSP) during 2024. The threat has been hanging over us ever since and if approved LDSP would destroy the quality of our lives. My reasons are summarised below and I am asking the Examining Authority to take all of them fully into account:	The Applicant confirms that the matters raised within this Representation have been addressed in detail in the Applicant's responses below.
SMEP-002	Cumulative Effects Site selection and Alternatives	The cumulative effect. We have learned to live with the small solar parks (less than 50MW) approved by Wiltshire Council. They have been carefully located, taking account of the contours of the land and critical viewpoints. In contrast, LDSP is effectively five NSIPs squashed between nine villages and surrounding the village of Norton. LDSP would be approximately 10km (west to east) and 5km (north to south) forming a 'footprint' of some 50 sq kms of the Cotswolds. Just the thought of LDSP gives rise to feelings of sadness, nausea and disgust. No wonder literally thousands of people are protesting, communicating their feelings and attending public meetings. We are	Overlapping effects and cumulative effects are acknowledged as a key matter. Full consideration, assessment and reporting of intra- and inter-project cumulative effects has been undertaken. An intra- project effects assessment has been undertaken whereby all overlapping effects across all technical disciplines are considered to determine where effects in one discipline (such as glint and glare) together with effects from another discipline (such as noise) could combine to generate a significant effect. The assessment is reported in Table 21-6 and Table 21-7 of **ES Volume 1, Chapter 21: In-Combination and Cumulative Effects [APP-073]**. With implementation of the secured management and mitigation measures, effect interactions do not increase the significance of effects identified in the Environmental Statement. With regard to inter project effects, a full assessment has been undertaken, considering 358 long list developments and 41 short-list developments. This is set out in **ES Volume 1, Chapter 21: Cumulative and In-Combination Effects [APP-073]**.

Reference	Theme	Comments/Issues Raised	Applicant's Response
		appalled by both the scale of LDSP and the great variety of harms it represents.	
SMEP-003	Hydrology, Flood Risk and Drainage	Severe Flooding. I mention this because, at the time of writing, my wife and I have just experienced another flood, this time caused by Storm Claudia. Unluckily, we had arranged a large celebratory dinner for family and friends. Once again all three roads serving the village of Foxley were impassable, something that now happens at least three or four times a year. By 7.00pm it was pitch dark and we received desperate phone calls from our guests. They had reached the margins of Foxley but could go no further. I ventured out on foot to see if I could assist only to be confronted by fast moving flood water, numerous abandoned cars and passengers in a state of anxiety. To add to the misery, the mountain of food we had prepared found its way into the recycling! I mention this because the local area is highly vulnerable to flooding and this is bound to be exacerbated by the rapid runoff of rainfall from over half a million giant solar panels and other infrastructure.	The Applicant acknowledges the experience of severe flooding associated with recent storm events, including Storm Claudia. These events reflect existing baseline flood risk conditions. The flood risk assessment has been undertaken on the basis that the Scheme must not increase flood risk elsewhere and concludes that it would avoid significant adverse effects on flood risk receptors. The assessment distinguishes between panelled areas and controlled drainage associated with supporting infrastructure and is consistent with national policy and is set out in **ES Volume 1, Chapter 11 Hydrology: Flood Risk and Drainage [APP-063]**. No amendments to the application documents are required.
SMEP-004	Socio-Economics, Tourism and Recreation Landscape and Visual	Walking, Cycling and critical viewpoints We enjoy the countryside and walk or cycle for an average of at least one hour a day in the areas that would be affected by LDSP. For example we use the PROW serving the Vine Tree pub at Norton or cycle to the Neeld Arms at	The assessment in **ES Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** and the supporting **ES Volume 3 Appendix 16-2 Tourism and Recreation Receptor Tables [APP-241]** have assessed the likely impacts of the Scheme at construction, operation, peak replacement, and decommissioning on tourism and recreation receptors, including individual PROWs within 2 km of the Scheme. No significant adverse effects are anticipated to individual PROWs at any phase of the Scheme,

Reference	Theme	Comments/Issues Raised	Applicant's Response
		Grittleton, combining trips with refreshments. These journeys and numerous other outings made locally would become a thing of the past if channeled between security fencing and 4.5m high panels or affected by views of batteries, substations and other infrastructure. One major viewpoint that must be considered is from NORT2 adjacent to Foxley Grove. This is within the National Landscape/former AONB where the view to the south will be adversely affected by LDSP.	subject to implementation of mitigation measures secured through the Requirements in Schedule 2 to the **Draft DCO [APP-016]**. The Applicant has not individually assessed bridleway NORT2 as it was not considered likely to have any significant effect from the Scheme when first screened. This was determined as views of the Scheme are likely to be largely screened by existing vegetation and topography, even from the fields adjacent to the Fosse Way where the nearest Solar PV Array area would be more than 1.1 km away. NORT2 furthermore does not connect to any highway that is proposed to have construction traffic routed along it, further reducing the likelihood of any significant adverse effect.
SMEP-005	Transport and Access	Road network and road safety The local road network is totally unsuited to the imposition of LDSP. The introduction of heavy traffic and abnormal loads would turn local roads into a nightmare! They are already too narrow to cope with even existing traffic. Vehicles travelling in opposite directions force each other to the edges of the carriageway causing soft verges to form deep ruts and puddles. Informal, muddy and rutted passing places have formed. Frequently opposing vehicles make contact and side mirrors are smashed. At busy times, travel is stressful and the local network is already at saturation point. Furthermore IGP's traffic figures are serious under estimates and should be challenged.	The assessment presented in Annex H of **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]** demonstrates adequate carriageway width or frequency of passing place opportunity to pass at least an HGV and a light vehicle as requested in comments provided by Wiltshire Council in its response (August 2025) to the Transport Assessment Scoping Note and confirmed in Paragraph 4 of 'Appendix A - Highways and Transport Document Review - Detailed Comments'. This confirms that no passing bay or widening improvements are needed to accommodate these movements on the construction route outside of the Order Limits. The distances between passing points outside of the Order Limits are all within 150 m with forward visibility extending to the next passing point and beyond. This is within the generally accepted distance of 200 metres. As set out in the **OCTMP [APP-287]**, a booking system will be set up to manage arrivals and departures to the Order Limits. This will be implemented in coordination with banksmen, which will be able to hold back any cross-over, should there be any delays on the roads. This will prevent HGVs generated by the Scheme passing each other in opposite directions on the local roads forming part of the construction routes and will be

Reference	Theme	Comments/Issues Raised	Applicant's Response
			confirmed as part of the final CTMP. Regarding routes through the Hulavington area, excessive widening of existing rural routes to allow two HGVs to pass would be over engineering, because of the following reasons: • temporary nature of the construction period; • trip generation of 76 HGVs on the route to Lime Down D is an estimate of the deliveries on a peak day, so does not represent a daily average; • trip generation of 76 HGVs on the route to Lime Down D is based on the worst-case assumptions, including but not limited to, all phases and Solar PV Sites being constructed simultaneously and a 50% uplift; • average number of HGV construction movements along the route to Lime Down D is only 50 per day/7 per hour/one every 8 minutes (less than the journey time along the route); - assuming a realistic construction programme, the average number of HGV construction movements along the route to Lime Down D is only 32 per day/5 per hour/one every 13 minutes (less than the journey time along the route); • delivery times during the construction phase are limited to those times set out in the **OCTMP [APP-287]**. There will be no HGV construction trips outside of these hours; • there would be a much greater impact on hedgerow, trees and character; and • low level of existing HGVs on the route to Lime Down D (average number of existing HGV movements is only 46 per day, with some of these movements occurring outside of proposed construction hours set out in the **OCTMP [APP-287]**) Regarding routes through the Foss Way area, excessive widening of existing rural routes to allow two HGVs to pass would be over engineering, because of the following reasons: • temporary nature of the construction period;

Reference	Theme	Comments/Issues Raised	Applicant's Response
			• trip generation of 16 HGVs on the route to Lime Down A is an estimate of the deliveries on a peak day, so does not represent a daily average; • trip generation of 16 HGVs on the route to Lime Down A is based on the worst-case assumptions, including but not limited to, all phases and Solar PV Sites being constructed simultaneously and a 50% uplift; • average number of HGV movements along the route to Lime Down A is only 10 per day/less than 2 per hour/one every 42 minutes (less than the journey time along the route), with the construction phase for Lime Down Site A only lasting 9 months • delivery times during the construction phase are limited to those times set out in the **oCTMP [APP-287]**. There will be no HGV trips outside of these hours; • impact on hedgerow, trees and character; and • low level of existing HGVs on the route to Lime Down A (average number of existing HGV movements is only 40 per day, with some of these movements occurring outside of proposed construction hours set out in the **oCTMP [APP-287]**) Regarding routes through the Alderton area, excessive widening of existing rural routes to allow two HGVs to pass would be over engineering, because of the following reasons: • temporary nature of the construction period; • trip generation of 50 HGVs on the route to Lime Down A-C is an estimate of the deliveries on a peak day, so does not represent a daily average; • trip generation of 50 HGVs on the route to Lime Down A-C is based on the worst-case assumptions, including but not limited to, all phases and Solar PV Sites being constructed simultaneously and a 50% uplift; • average number of HGV construction movements along the Route to Lime Down A-C route is only 32 per day/7

Reference	Theme	Comments/Issues Raised	Applicant's Response
			per hour/one every 8 minutes (less than the journey time along the route); • assuming a realistic construction programme, the average number of HGV construction movements along the route to Lime Down A-C is only 17 per day/less than 3 per hour/one every 25 minutes (less than the journey time along the route) • delivery times during the construction phase are limited to those times set out in the **oCTMP [APP-287]**. There will be no HGV trips outside of these hours; • impact on hedgerow, trees and character; and • low level of existing HGVs on the route to Lime Down A-C (average number of existing HGV movements is only 20 per day, with some of these movements occurring outside of proposed construction hours set out in the **oCTMP [APP-287]** Further detail of trip generation has also been added to **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]** which will be submitted at Deadline 1 of Examination. To provide further comfort, additional information has been added to **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]** which will be submitted at Deadline 1 of Examination. This demonstrates that there is adequate carriageway width and/or passing place opportunity for two HGVs.
SMEP-006	Landscape and Visual	Landscape and Visual Impact The height and scale of the proposed industrial infrastructure will transform the landscape over a vast area. The existing topography does not lend itself to this sort of development which would be far too close to the nine Cotswolds villages. Furthermore, LDSP (as amended) and the proposed routing of	**ES Volume 1, Chapter 13: Transport and Access [APP-065]** identifies the links in the CNL. The links are identified as 'medium' sensitivity as agreed with WC. Construction traffic would be temporary. The construction traffic is managed through a Final CTMP which is a requirement of the DCO. Road condition surveys will ensure any damage to the highway network caused by construction traffic is rectified. **ES Volume 1, Chapter 13: Transport and Access [APP-065]** concludes that the impact would be negligible to minor adverse.

Reference	Theme	Comments/Issues Raised	Applicant's Response
		HGVs would cause unacceptable damage to the Cotswolds National Landscape	
SMEP-007	Noise and Vibration	Noise The area is quiet except for the noise of local traffic and the occasional agricultural tractor. The increase in noise needs to be properly evaluated both during construction and after completion. For example, the BETT's cooling fans would operate day and night and other sources would be too close to residential development. This too is a major concern.	The noise and vibration impacts arising from construction activities are assessed in Section 14.10 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**. Mitigation measures are committed to through the **Outline Construction Environmental Management Plan [APP-277]**. A noise monitoring programme agreed with Wiltshire Council will be carried out during construction. The preparation, approval and implementation of the Construction Environmental Management Plan, substantially in accordance with the **Outline CEMP [APP-277]**, is secured through Requirement 13 in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that construction noise and vibration are appropriately controlled. With these measures in place, the assessment concludes that no significant effects from construction noise or vibration are expected. The noise impacts from the operation of the Scheme and its components are assessed in Section 14.10 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**. As shown in Table 8 and Table 9 of **ES Volume 3, Appendix 14-4: Noise Modelling [APP-237]**, levels would typically be below or slightly above the existing background sound in the area during the day and night. The **Outline Operational Environmental Management Plan [APP-278]** commits to noise levels from the Scheme at residential dwellings being the same as or below those modelled in the ES. This provides assurance that significant effects from operational noise will be avoided, while allowing flexibility in how this is achieved. The preparation, approval and implementation of the detailed OEMP, substantially in accordance with the outline plan, are secured through Requirement 14 of Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring operational

Reference	Theme	Comments/Issues Raised	Applicant's Response
			noise is appropriately controlled throughout the lifetime of the Scheme.
SMEP-008	Climate Change and Energy Need	Carbon Balance Preliminary calculations are suggesting that LDSP would increase the level of carbon in the atmosphere once the emissions from the manufacture of the industrial infrastructure is properly taken into account. In other words, assessed over its total lifetime, LDSP (with an exceptional length of underground cabling) may not be a 'green' project. I request the Examining Authority to fully evaluate all of the above.	**ES Volume 1, Chapter 7: Climate Change [APP-059]** assesses greenhouse gas (GHG) emissions across the full life cycle of the Scheme, including the manufacture, transport, installation, operation, maintenance and decommissioning of Scheme components. This assessment includes embodied carbon associated with materials and components, as well as operational emissions savings arising from renewable electricity generation. The assessment concludes that, while emissions are associated with the manufacture and construction of the Scheme, these are outweighed over time by the carbon savings achieved through the displacement of fossil fuel-derived electricity generation. When considered over its operational lifetime, the Scheme would result in a net reduction in GHG emissions compared to a 'without Scheme' scenario and would make a meaningful contribution to the UK's legally binding carbon budgets and transition to net zero.
SMEP-009	Site selection and Alternatives	Underground cabling LDSP would be the most disruptive of all solar NSIPs. It requires a 20km long underground 400kV connection to the National Grid including crossings of the M4 motorway and two mainline railways. Its sprawling layout also requires about 15km of underground 125kV cable. The underground cabling would seriously disrupt at least 40 farm/landowners who would be forced to enter into contracts with the developer. IGP has attempted to hide this disruption by offering substantial financial inducements not to object to	The Applicant's approach to site selection is set out in further detail in **ES Volume 3, Appendix 4-1: Site Selection Assessment Report (The SARR) [APP-185]**. The **SSAR [APP-185]** explains how sites closer to the point of connection were initially considered, before the search area was expanded on the basis no suitable sites closer to the point of connection were identified. The construction of the cable route has been assessed throughout the **ES [APP-052 to APP-265]**, which considers the likely significant construction effects associated with these works. The **ES [APP-052 to APP-265]** assesses the cable route within defined parameters, including limits on working width and trench dimensions, to ensure that a reasonable worst-case scenario is assessed. The detailed design and construction of the cable route would be undertaken within the parameters assessed and authorised by

Reference	Theme	Comments/Issues Raised	Applicant's Response
		LDSP thereby distorting the evaluation of the impact of the development.	the DCO. Measures to manage and minimise construction effects, including reinstatement of land following installation, are set out in the **Outline Construction Environmental Management Plan (CEMP) [APP-277]**. Agreements reached with the relevant landowners are detailed in the **Statement of Reasons [APP-018]**, the **Book of Reference [APP-020]** and the **Land and Rights Negotiations Tracker [APP-021]**.

6.61 Anna Maria Pitt

Table 6-61 RR-0342

Reference	Theme	Comments/Issues Raised	Applicant's Response
AMP-001	Transport and Access Landscape and Visual	We live in the tiny Hamlet of Foxley. There are approximately 25 houses and at present we are lucky enough to have a handful of families with very young children. We walk daily and we encounter the young families, many cyclists dog walkers, children being picked up to and from school farm traffic, workers to and from the local business units and passing traffic. Our lanes are narrow, cars are unable to pass each other but need to back up or mount the banks. We all have the right to use the road safely this project will place an unsafe and unfair burden on our community. I can feel that it will change in character to the extent that families will need to leave, we will not be able to enjoy our immediate landscape and turn this lovely diverse country landscape into a sterile dangerous and impossible setting.	The applicant make note of this comment. The proposed construction route does not route through Foxley.
AMP-002	Transport and Access	Added to this our road net works are very prone to flooding as seen on Friday 14th with storm Claudia. Each road in to Foxley and surrounding village was cut off by flood water, this project with all the run off from the panels will make an already regular problem many times worse. This project need to be placed in a suitable environment well away from daily living, where there are proper ,safe road networks, where life is not endangered by unsuitable traffic and risk of flooding. Solar farms are already an obsolete way of raising energy, despoiling this	The Applicant acknowledges that local roads and villages experience flooding under existing baseline conditions. The flood risk and drainage assessment concludes that the Scheme would not exacerbate these conditions or increase flood risk elsewhere. National policy recognises that ground-mounted solar PV generally drains to ground and does not create significant drainage impacts where ground cover is maintained (NPS EN-3 paragraph 3.10.75). Scheme-specific drainage controls are secured through the DCO discharge process. **Draft Development Consent Order [APP-016]**. No amendments to the application documents are required.

Reference	Theme	Comments/Issues Raised	Applicant's Response
		beautiful area which can never be returned to its natural state would be a tragic act of vandalism.	

6.62 Philip Charles Davey

Table 6-62 RR-3782

Reference	Theme	Comments/Issues Raised	Applicant's Response
PCD-001	Cumulative Effects Landscape and Visual	My principal objections to the proposed development are as follows: Cumulative impact - the area in north Wiltshire around the proposed development is already the subject of a large number of other solar projects. These include large scale solar installations at Minety, Kemble, Rodbourne, Castle Combe, Battens Farm, Hill Hayes Lane and Beanacre. Planning permission has recently been granted for three more large scale solar installations at Leigh Delamere, Red Barn and Forest Gate. Construction works are expected to commence on these developments in the next 24 months. The clustering of so many large scale solar installations across one area is having a significant and adverse environmental impact in terms of visual amenity and changes to the character of the landscape Lime Down will only contribute massively to this.	Overlapping effects and cumulative effects are acknowledged as a key matter. Full consideration, assessment and reporting of intra- and inter-project cumulative effects has been undertaken. An intra- project effects assessment has been undertaken whereby all overlapping effects across all technical disciplines are considered to determine where effects in one discipline (such as glint and glare) together with effects from another discipline (such as noise) could combine to generate a significant effect. The **In-Combination Effects Matrix [APP-264]** sets out all receptors and technical disciplines considered. The assessment is then reported in Table 21-6 and Table 21-7 of **ES Volume 1, Chapter 21 In-Combination and Cumulative Effects [APP-073]**. With implementation of the secured management and mitigation measures, effect interactions do not increase the significance of effects identified in the Environmental Statement. With regard to inter project effects, a full assessment has been undertaken, considering 358 long list developments and 41 short-list developments. This is set out in **ES Volume 1, Chapter 21: Cumulative and In-Combination Effects [APP-073].**
PCD-002	Site selection and Alternatives	Scale of the development - the acreage that will be directly and indirectly affected by this development is disproportionate to the claimed benefits. The configuration of the development means that the area that will be impacted will extend to over four miles from east to west and will be situated in close proximity to over ten villages/towns. It appears to be a patchwork of sites linked by major cabling works that extend the footprint of the development over an area that	The Scheme has been designed to deliver the greatest possible benefit from the available land and the available grid connection, whilst avoiding, minimising and/or mitigating harmful environmental effects. As per the description set out in **ES Volume 1, Chapter 3: The Scheme [APP-055]** the total area within the DCO Order Limits encompasses approximately 1,237 hectares (ha). Of this, the 'Solar PV Sites' comprise approximately 749.1 ha of land. Around 479.5 ha of this land is proposed as being required for installation of solar PV, battery storage, and associated infrastructure. The remaining 269.5 ha would provide areas dedicated to ecological mitigation, measurable Biodiversity Net Gain (BNG) delivery, landscaping, offsets and agricultural land managed for environmental enhancement and habitat creation.

Reference	Theme	Comments/Issues Raised	Applicant's Response
		will disproportionately and adversely impact a large part of north Wiltshire.	The Applicant remains committed to delivering a Scheme that makes a meaningful contribution to the UK's transition to net zero, while also seeking to minimise adverse impacts and maximise opportunities for environmental enhancement and community benefits. As set out in **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]**, the Applicant undertook an initial review which did not identify a single site of the appropriate size (1,100 ha) within the area of search. Therefore, the Applicant considered both contiguous land parcels and land parcels near one another. The **Statement of Need [APP-266]** explains at Section 7.4 that NSIP proposals may comprise adjoining or separate parcels of land and that "*the connection of separate parcels of suitable land together into a single scheme may, subject to analysis, enable those parcels of land to connect economically to the electricity system*" which is the case for this Scheme. Section 8.2 of the **Statement of Need [APP-266]** explains that by bringing the parcels together into a single scheme, the Scheme is able to carry a connection to the National Electricity Transmission System (NETS), thus providing a local source of low carbon electricity and also enabling the efficient bulk transfer of energy generated at the Scheme so that any surplus can be used to cover shortfalls elsewhere. By connecting to the NETS, the Scheme will not impact the feasibility or timing of distribution network connections for either new generation or consumption connections which among other things are required to support the delivery of Wiltshire County Council's growth plans.
PCD-003	Site selection and Alternatives Transport and Access	Cabling route - this will cover over 20 kilometres and will require traversing or tunnelling a large number of major and minor transport routes including the M4, the A420 and the A4. These are critical transport arteries and crucial to the local and national economies. It will also cross the main train line between London and South Wales. The transport plan also fails to address the	The level of traffic generated by cable route construction will be well within daily fluctuations of routes such as M4, A350, A4 and A420. The construction routes for Red Barn or Forest Gate solar development do not share any unclassified roads with the Scheme. There is a small cross over with the Leigh Delamere construction route for Cable Corridor Access Locations 105, 106 and 107. This crossover relates to the initial 220 metres of Sevington Lane, where passing places which allow two HGVs to pass are being provided as part of the Leigh Delamare scheme and small 200 metre section of The Street in Yatton Keynall.

Reference	Theme	Comments/Issues Raised	Applicant's Response
		fact that the transport movements will share routes already earmarked for use by the proposed solar developments at Leigh Delamere, Red Barn and Forest Gate. These include the M4, A350, A4, A420 and unclassified roads around Yatton Keynell, Kington St Michael and Grittleton. There is no aggregation of the impact of these will have if the Lime Down project takes place during the construction phases of these other projects.	Each cable route corridor construction access point which will be in operation for a temporary period of approximately 90 day, generating a low level of construction traffic as set out in **ES Volume 1, Chapter 13: Transport and Access [APP-065]**.

6.63 Mary Cole on behalf of Peter Cole

Table 6-63 RR-3056

Reference	Theme	Comments/Issues Raised	Applicant's Response
MCPC-001	Soils and Agriculture Description and DCO Process Transport and Access	I object to 1. Agricultural land being used for solar panels anywhere. 2 .Macquarieof Thames water and from Australia disrupting our ecology community and all our livelihoods. 3.Potentially dividing the grazing ground for my animals and also my crops. 4.the danger [traffic congestion] for our daughter [REDACTED] when and wherever she cycles to as her means of independance and not least to visit her Doctor in [REDACTED]	The assessment of effects on agricultural land and farming operations, including temporary land take associated with the cable route, is provided in **ES Volume 1, Chapter 17: Soils and Agriculture [APP-069]**, with detailed construction methodology set out in **ES Volume 3, Appendix 3-2: Cable Route Construction Method Statement [APP-183].** The cable trench required for installation of underground cables would have a maximum anticipated working width of approximately 7 metres. This equates to a temporary disturbance of approximately 0.07 hectares per hectare of land crossed. Disturbance associated with cable installation would be short-term and localised, and following reinstatement, agricultural operations within the affected fields would be able to recommence. Accordingly, land take associated with cable installation would not permanently remove the affected land from agricultural use, and the extent and duration of disturbance have been assessed as limited. Potential impacts on ecology and biodiversity are fully assessed in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**. This assessment considers baseline ecological conditions and evaluates likely significant effects arising during the construction, operation and decommissioning phases of the Scheme. It identifies avoidance, mitigation and enhancement measures to address potential impacts on habitats and protected and notable species. It also identifies opportunities for ecological enhancement, including the creation and long-term management of habitats, and delivery of biodiversity net gain. The assessment concludes that, with the identified embedded and additional mitigation measures in place, no unacceptable significant adverse effects on ecology and biodiversity are anticipated. The Applicant notes that the approach to the assessment in relation to ecology and biodiversity in general is under discussion with Wiltshire Council and Natural England and is set out in the relevant **Statements of Common Ground** to be submitted at Deadline 1.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			During construction, specific measures are proposed to avoid disturbance and displacement of wildlife. These include protective buffers around sensitive habitats and features, timing restrictions on vegetation clearance, pre-construction ecological surveys, species-specific mitigation, and pollution prevention controls which are set out in the **Outline Ecological Protection and Mitigation Strategy (EPMS) [APP-284]**. Measures to protect trees and hedgerows are also set out in **ES Volume 1, Chapter 10 Arboriculture [APP-062]**. The Scheme will also result in the cessation of intensive arable farming within the Solar PV Sites. As identified in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**, this is expected to reduce the ongoing application of herbicides and pesticides, supporting improvements in habitat quality over the operational lifetime of the Scheme. The reversion of existing arable land within the Solar PV Sites to predominantly grassland habitats can be expected to benefit a wide range protected and notable species, as identified in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**. Mitigation and enhancement measures are detailed in the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]** and the **Outline Ecological Protection and Mitigation Strategy (OEPMS) [APP-284]**, which set out habitat creation, species protection measures, buffer zones and long-term ecological management. The preparation, approval and implementation of the detailed Landscape and Ecological Management Plan, substantially in accordance with the **OLEMP [APP-283]**, are secured through Requirement 7 in Schedule 2 of the **Draft Development Consent Order [APP-016]**. The preparation, approval and implementation of the detailed Ecological Protection and Mitigation Strategy, substantially in accordance with the **OEPMS [APP-284]**, are secured through Requirement 8 in Schedule 2 of the **Draft Development Consent Order [APP-016]**. These

Reference	Theme	Comments/Issues Raised	Applicant's Response
			requirements ensure that ecological protection and enhancement measures are delivered and maintained throughout construction and operation of the Scheme. An assessment of the likely effects of the Scheme on the local economy and employment is provided in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]**. This chapter considers potential impacts on construction and engineering sectors, agricultural activity, tourism-related businesses, and wider local economic conditions during construction, operation and decommissioning. Supporting evidence is provided in **ES Volume 3, Appendix 16-3: Socio-Economics, Tourism and Recreation - Summary of Non-Significant Effects [APP-242]**, which summarises that effects on the local economy and economic prosperity are assessed as negligible to minor beneficial, with construction expenditure and employment generation contributing positive, temporary effects on local economic activity. The assessment therefore concludes that the Scheme would not result in significant adverse effects on local businesses or the wider local economy, and that socio-economic benefits, including job creation and local supply-chain opportunities, are expected during the construction phase, with more modest economic and skills and supply chain opportunities during the operational phase. The Applicant notes that the approach to assessment of socio-economic effects has been agreed with Wiltshire Council's Economic and Regeneration Team, with the exception of matters relating to agricultural employment, which the Applicant is discussing with the team. This is set out in the Statement of Common Ground with Wiltshire Council to be submitted at Deadline 1. The potential effects of construction traffic on the local highway network, including the Fosse Way, are assessed in **ES Volume**

Reference	Theme	Comments/Issues Raised	Applicant's Response
			1, Chapter 13: Transport and Access [APP-065]. The assessment considers construction vehicle routing, traffic volumes, road safety and effects on road users, and non-motor users, and concludes that, with appropriate mitigation in place, construction traffic would not give rise to unacceptable impacts on the operation or safety of the Fosse Way. Construction vehicle movements will be managed through a Construction Traffic Management Plan. An **Outline Construction Traffic Management Plan (CTMP) [APP-277]** has been prepared and submitted with the Application. The CTMP sets out measures to ensure that the effect of construction traffic on the local highway network is minimised, including defined construction access points, approved HGV routes, coordination of deliveries, and timing restrictions to avoid peak traffic periods where practicable. The CTMP also includes a road condition and dilapidation survey of minor roads not typically used by HGV traffic. Any damage to verges or carriageway surfaces caused by construction vehicles will be rectified to the satisfaction of the local highway authority. In addition, the CTMP includes community liaison measures to keep local communities informed on construction activity and to provide a contact point for feedback should any issues arise. The preparation, approval and implementation of the final CTMP, substantially in accordance with the outline CTMP, are secured through Requirement 15 of Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring construction traffic effects on the Fosse Way are appropriately managed throughout the construction phase. The Applicant acknowledges the comments made and is actively engaging with respondent to agree appropriate and reasonable accommodation works and to reach an amicable solution for all parties. Updates of these discussions are captured in the **Land and Rights Negotiations Tracker [APP-021]**. Notwithstanding this, under the provisions of the Land Compensation Act 1961

Reference	Theme	Comments/Issues Raised	Applicant's Response
			and the Land Compensation Act 1973, reasonable losses incurred by the landowner or occupier as a result of the Applicant's works are recoverable following claims to the Applicant upon a loss being incurred.

6.64 James Cole

Table 6-64 RR-2028

Reference	Theme	Comments/Issues Raised	Applicant's Response
JCE-001	Soils and Agriculture	Dear Planning Inspectors, Please reject this planning application for the following reasons. Nationally- It is a foolish idea to industrialise arable land when it is getting increasingly difficult to maintain yields, when the population is growing and when the geopolitical situation is more and more unstable. Energy can be derived from different sources. There is one finite source of arable land. Food security is vital. 2). Pound for pound investment, this is a highly inefficient way of producing energy. It is well documented that such schemes deliver negligible net positive environmental gain.	The potential effects of the Scheme on agricultural land are assessed in **ES Volume 1, Chapter 17 Soils and Agriculture [APP-069]**, which considers baseline agricultural land use and quality and evaluates likely effects during construction, operation and decommissioning. The assessment confirms that the Scheme will result in a temporary and reversible loss of agricultural land during the operational period, with all land to be returned to its original use and condition as far as practicable following decommissioning. No permanent loss of agricultural land is anticipated. The Applicant does not consider that food security will be compromised by the Scheme (or solar energy more widely). The latest figures to September 2024 indicate that solar occupied around 21,200 ha of agricultural land in the UK. In 2025, 545,000 ha of arable land in England were left uncropped (source: Department for Environment, Food & Rural Affairs, Agricultural land use in England at 1 June 2025). It should also be noted that food security is not identified as an issue within the suite of Energy National Policy Statements or the National Planning Policy Framework (NPPF). Further, the Government's UK Solar Roadmap (2025) states that solar development is not considered to compromise food security, but that the climate and nature crisis poses the greatest long-term risk to food security- a risk which the Scheme directly helps to address by providing a secure, low-carbon source of electricity. As set out in Section 2 of the **Outline Decommissioning Strategy [APP-279],** post-decommissioning of the Scheme, the landowners would choose how the land is to be used and managed. The landowner may return all of the land to arable use, although it is likely that established habitats such as hedgerows and woodland would be retained given their potential benefits to agricultural land and the wider farming estate.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Solar energy is at the heart of the Clean Power 2030 Mission (January 2026 revised NPS EN-3, Para 2.10.2) and it is the Government's view that a secure, reliable, affordable, net zero consistent system in 2050 is likely to be composed predominantly of wind and solar (NPS EN-1, Para 3.3.20). Sunlight, the input energy source for solar, is abundant, predictable, renewable, low carbon and free. Figure 16 of the **Statement of Need [APP-266]** and related text (Section 7.4) demonstrates that there are many viable areas of solar irradiation in the UK. Figures 28 and 29 of the Statement of Need and related text (Section 8.5) demonstrate that a multi-technology approach to electricity supply, including solar, can reduce the effects of weather variability on output and is capable of closely matching a future projection of national electricity demand on a month-average level. The inclusion of a Battery Energy Storage System as part of the Scheme will enable energy generated by the Scheme to be stored and exported to the grid when it is needed, which will provide flexibility and improve grid reliability.
JCE-002	Construction and Decommissioning Description and DCO Process Socio-Economics, Tourism and Recreation Hydrology, Flood Risk and Drainage Noise and Vibration	Locally- This project will cause a huge amount of local upheaval both during construction and long term. There is likely to be significant traffic disruption, noise pollution and the increased risk of flooding, which will impact local businesses and the rural economy. It will also dramatically visually spoil a significant area of historic heritage. I can see no benefit to the local area in any shape or form.	<u>Construction Phase</u> The likely significant effects of the Scheme during the construction phase are assessed throughout the **ES [APP-052 to APP-265]**, including effects on traffic and transport, noise and vibration, air quality, landscape and visual amenity, ecology, and local communities. Where likely significant effects are identified, appropriate mitigation measures are incorporated into the Scheme. Measures to limit disruption during construction are set out in the **Outline Construction Environmental Management Plan (CEMP) [APP-277]**. **Requirement 13 in Schedule 2 to the Draft DCO [APP-016]** secures that part of the authorised development can commence until, a CEMP is submitted to and approved by the relevant planning authority. The CEMP must be substantially in

Reference	Theme	Comments/Issues Raised	Applicant's Response
			accordance with the Outline CEMP, and all construction works associated must be carried out in accordance with the approved CEMP. Transport and Access The potential effects of construction traffic on the local highway network are assessed in **ES Volume 1, Chapter 13: Transport and Access [APP-065]**, which considers construction vehicle movements, traffic volumes, road safety and effects on road users. This included the capacity of local roads and infrastructure to accommodate construction vehicles with consideration of construction traffic volumes, vehicle types, route suitability, and network performance. The assessment concludes that the level of construction traffic associated with the Scheme is unlikely to materially affect road safety on links within the Study Area, and no significant adverse effects on accident risk are anticipated. The assessment additionally concludes that with appropriate mitigation such as the Construction Traffic Management Plan in place to manage construction vehicle movements, there would be no significant adverse impacts on the local highway network during the construction, operation maintenance, and decommissioning phases of the Scheme. An **Outline Construction Traffic Management Plan (CTMP) [APP-287]** has been prepared and submitted with the DCO application. The aim of the CTMP is to ensure that the effect of the construction phase on the local highway network is minimised. The **Outline CTMP [APP-287]** sets out measures to coordinate construction deliveries by HGVs to arrive and depart between 09:30 and 16:30 where possible, to avoid peak network hours of 08:00–09:00 and 17:00–18:00. It also includes a community liaison element to keep local communities informed about the

Reference	Theme	Comments/Issues Raised	Applicant's Response
			construction process and to provide a contact for feedback should any issues arise. Compliance with the CTMP will be monitored by the Developer, Contractor and Wiltshire Council as local highway authority. The preparation, approval and implementation of the final CTMP, substantially in accordance with the outline CTMP, are secured through Requirement 15 of Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring construction traffic impacts are appropriately managed throughout the construction phase of the Scheme. <u>Noise and Vibration</u> An assessment of the effects of the Scheme on noise and vibration is provided in **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**, with supporting technical information supplied in **ES Volume 3, Appendix 14-4: Noise Modelling [APP-237]**. The assessment considers potential noise and vibration impacts during construction, operation and decommissioning, including from solar PV panels and associated infrastructure. The Applicant notes that the approach to noise and vibration has been discussed with Wiltshire Council, as described in Section 14.2 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**. <u>Construction phase</u> The noise and vibration impacts arising from construction activities are assessed in Section 14.10 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**. For the purposes of the assessment, a reasonable worst-case scenario assuming piling activities has been considered. Mitigation measures associated with construction activity are presented in Section 14.9 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]** and are committed to through the **Outline Construction**

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Environmental Management Plan [APP-277]. A noise monitoring programme agreed with Wiltshire Council will be carried out during construction. The preparation, approval and implementation of the Construction Environmental Management Plan, substantially in accordance with the **Outline CEMP [APP-277]**, is secured through Requirement 13 in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that construction noise and vibration are appropriately controlled. With these measures in place, the assessment concludes that no significant effects from construction noise or vibration are expected. <u>Operational phase</u> The noise impacts from the operation of the Scheme and its components are assessed in Section 14.10 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**, with supporting modelling provided in **ES Volume 3, Appendix 14-4: Noise Modelling [APP-237]**. A penalty has been applied to predicted noise levels from the Solar PV Sites to account for the distinctive nature of the sound. Potential mitigation measures are detailed in Section 14.9 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**, and with such measures in place, significant effects from operational noise are not expected. The **Outline Operational Environmental Management Plan [APP-278]** commits to noise levels from the Scheme at residential dwellings being the same as or below those modelled in the ES. This provides assurance that significant effects from operational noise will be avoided, while allowing flexibility in how this is achieved. The preparation, approval and implementation of the detailed OEMP, substantially in accordance with the outline plan, are

Reference	Theme	Comments/Issues Raised	Applicant's Response
			secured through Requirement 14 of Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring operational noise is appropriately controlled throughout the lifetime of the Scheme. Flood Risk An assessment of the effects of the Scheme on flood risk both within the Site and the surrounding area is provided in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [APP-063]**, with supporting information provided in **ES Volume 3, Appendix 11-1 to 11-9: Flood Risk Assessment and Drainage Strategy [APP-210 to APP-218]**. The assessment concludes that, with the embedded mitigation measures secured, the Scheme would not result in a material increase in off-site flood risk, including to adjacent communities and downstream receptors, and that any on-site flood risk would be managed such that the Scheme remains safe and operable for its lifetime. The assessment has been prepared in accordance with national policy and best practice guidance and in consultation with the Environment Agency and Lead Local Flood Authority and is set out in the relevant **Statement of Common Ground** to be submitted at Deadline 1. The **Outline Construction Environmental Management Plan (CEMP) [APP-277]** has been developed to control construction-phase risks and ensure there is no material increase in off-site flood risk. In accordance with NPS EN-3 (paragraph 2.10.84), the assessment differentiates between solar PV panel areas, which drain to the existing ground and therefore do not generally give rise to significant drainage effects, and associated infrastructure (for example access tracks, temporary construction compounds, substations and the BESS) where runoff controls are required. Where drainage measures are necessary, these include permeable surfacing, infiltration

Reference	Theme	Comments/Issues Raised	Applicant's Response
			features, swales and attenuation storage to manage surface water and maintain greenfield runoff behaviour, as applicable. **Requirement 13 in Schedule 2 to the Draft DCO [APP-016]** secures that part of the authorised development can commence until, a CEMP is submitted to and approved by the relevant planning authority. The CEMP must be substantially in accordance with the Outline CEMP, and all construction works associated must be carried out in accordance with the approved CEMP. <u>Socio-Economics</u> An assessment of the likely effects of the Scheme on the local economy and employment is provided in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]**. This chapter considers potential impacts on construction and engineering sectors, agricultural activity, tourism-related businesses, and wider local economic conditions during construction, operation and decommissioning. Supporting evidence is provided in **ES Volume 3, Appendix 16-3: Socio-Economics, Tourism and Recreation – Summary of Non-Significant Effects [APP-242]**, which summarises that effects on the local economy and economic prosperity are assessed as negligible to minor beneficial, with construction expenditure and employment generation contributing positive, temporary effects on local economic activity. The assessment therefore concludes that the Scheme would not result in significant adverse effects on local businesses or the wider local economy, and that socio-economic benefits, including job creation and local supply-chain opportunities, are expected during the construction phase, with more modest economic and skills and supply chain opportunities during the operational phase.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			The Applicant notes that the approach to assessment of socio-economic effects has been agreed with Wiltshire Council's Economic and Regeneration Team, with the exception of matters relating to agricultural employment, which the Applicant is discussing with the team. This is set out in the Statement of Common Ground with Wiltshire Council to be submitted at Deadline 1. <u>Landscape and Visual</u> An assessment of landscape and visual effects is provided in the Landscape and Visual Impact Assessment (LVIA) presented in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**. The LVIA assesses effects on identified landscape and visual receptors, including residential properties and users of public rights of way, and identifies where significant effects may occur. The LVIA found no significant long term visual effects to Residential Properties as a consequence of the Scheme. The scale of development within the Order Limits has been significantly reduced from the layout assessed in the Preliminary Environmental Information Report (PEIR) through an iterative design process undertaken in response to consultation and in accordance with the mitigation hierarchy to avoid, reduce and mitigate adverse effects. As part of this design evolution, panels along the edge of the Cotswolds National Landscape and along the Fosse Way have been removed. Mitigation measures to address landscape and visual effects are set out in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**, Figure 3-4-1 to 3-4-5.2 **Landscape and Ecology Mitigation Plan [APP-084]** and detailed within the **Outline Landscape and Ecological Mitigation Plan (LEMP) [APP-283]** and the **Outline Ecological Protection and Mitigation Strategy (EPMS) [APP-284]**. These documents

Reference	Theme	Comments/Issues Raised	Applicant's Response
			include proposals for new and enhanced planting, retention of existing hedgerows and woodland, and landscape integration measures to reduce visual effects over time. In addition, the Scheme design incorporates minimum offsets from existing landscape features, including residential properties, ancient woodland, woodland, hedgerows, public rights of way and watercourses, to further limit visual impacts. The preparation, approval and implementation of detailed landscape and ecological management plans, substantially in accordance with the **OLEMP [APP-283]** and **EPMS [APP-284]**, are secured through requirements in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that the identified mitigation measures are delivered and maintained throughout the lifetime of the Scheme. <u>Community Benefits</u> The Applicant acknowledges that any adverse effects from the Scheme are more likely to be felt locally than the largely wider-scale benefits of the Scheme. The Scheme is anticipated to help meet the UK's net zero requirements for energy production, which is considered a critical national priority and set out in National Policy Statements for Energy NPS EN-1 (section 4.2) and EN-3. This therefore will benefit the national population rather than just the local population. The benefits of the Scheme are set out in Section 5.3 of the Planning Statement [APP-267] and include the delivery of large amounts of cheap, secure, and low carbon electricity which will help the UK to achieve net zero by 2050, ecological and landscape enhancements, biodiversity net gain, permissive paths, employment generation, economic benefits and skills training. The Scheme is also anticipated to benefit the population within approximately 20km of the Scheme, through providing employment and income especially during construction and peak replacement activities, and providing skills and training

Reference	Theme	Comments/Issues Raised	Applicant's Response
			opportunities. Where the Scheme is anticipated to benefit local people more specifically, this is done through providing onsite permissive paths to increase access to the countryside, providing improved landscape planting through reinforcing existing hedgerows and planting of new trees, providing biodiversity net gains through habitat improvements. That notwithstanding, the Applicant is committed to providing a Community Benefit Fund to allow for community-driven benefits that are not necessarily associated with the Scheme itself. The purpose is to establish a means to recognise local community needs that the Applicant wants to be able to contribute towards in recognition of the local impact of the Scheme. The Community Benefit Fund is separate from the DCO process, and so is not bound to the same timescales or information requirements as submitted information. Furthermore, community benefits are legally immaterial to planning decisions and cannot be considered when deciding whether to grant planning consent. The Applicant acknowledges this and so has sought to provide the Community Benefit Fund voluntarily even though it won't add favourable weight in the planning balance.
JCE-003	Construction and Decommissioning Site selection and Alternatives Soils and Agriculture	Personally- This project will cause significant disruption. The proposed cable route bisects our pasture land causing access and grazing issues. It will entail the destruction of historic pasture land, the removal of mature trees and it cuts through established permanent crops. If the cable needs to be joined we will lose productive land. Any disturbance of soil no matter how carefully done will lead to years of	The assessment of effects on agricultural land and farming operations, including temporary land take associated with the cable route, is provided in **ES Volume 1, Chapter 17: Soils and Agriculture [APP-069]**, with detailed construction methodology set out in **ES Volume 3, Appendix 3 2: Cable Route Construction Method Statement [APP-183]**. The cable trench required for installation of underground cables would have a maximum anticipated working width of approximately 7 metres. This equates to a temporary disturbance of approximately 0.07 hectares per hectare of land crossed. Disturbance associated with cable installation would

Reference	Theme	Comments/Issues Raised	Applicant's Response
		underproduction. (We had a sewer pipe laid across our land (by compulsory order) in 2017. It is still only producing about 50% of what it did 8 years ago).	be short term and localised, and following reinstatement, agricultural operations within the affected fields would be able to recommence. Accordingly, land take associated with cable installation would not permanently remove the affected land from agricultural use, and the extent and duration of disturbance have been assessed as limited.
JCE-004	Description and DCO Process	If recent dealings with IGP and its representatives are anything to go by, I have very little faith that this project can be efficiently delivered. They have demonstrated a level of incompetence that I have not experienced in over 30 years of business. I am seriously not looking forward to having to deal with them. This project only benefits 5 landowners, IGP and Macquarie. Thank you your time in considering this. Kind regards, James Cole	The Applicant notes the comments made, and the Applicant will continue to engage throughout the process on the land rights sought from the respondent, updates of which will be captured in the **Land and Rights Negotiations Tracker [APP-021]**.

6.65 Mark Sturgess

Table 6-65 RR-3018

Reference	Theme	Comments/Issues Raised	Applicant's Response
MS-001	Description and DCO Process Socio-Economics, Tourism and Recreation Hydrology, Flood Risk and Drainage Noise and Vibration Ecology and Biodiversity	I feel strongly that this industrial sized solar scheme should not be granted planning approved, my main objections and concerns are as follows. I enjoy cycling and walks in the affected areas and these would be adversely affected during the construction and operation of the solar farm, permanently destroying the views and the sound of the surrounding wildlife. In Corston where I live we already suffer from flooding and I am sure that the addition of acres of solar panels increasing the rainfall run off from the surrounding fields will only increase the severity and frequency of future flooding. The local wildlife's ability to move through the country side in the affected area will be adversely affected first by the construction phase works and then due to fencing surrounding the solar panes and other infrastructure buildings and equipment. The noise generated by the equipment may also negatively affect wildlife.	A detailed assessment of the likely significance of effects from the Scheme on the use and desirability of individual PRoW, and recreational access to the countryside, has been included in the **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** and **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]**. This assessment considers the impact on individual recreational routes – be that practically in their use, and their enjoyment and desirability. The Applicant confirms that the majority of significant adverse effects can be mitigated, however understands that some significant adverse effects to users of PROWs and unsurfaced roads in Lime Down E cannot be mitigated further during construction. No significant residual effects are anticipated during the operational phase of the Scheme. The Applicant notes that the assessment of PROW impacts and mitigation is under discussion with Wiltshire Council's Countryside Access Team and is set out in the Statement of Common Ground with Wiltshire Councilto be submitted at Deadline 1. The Applicant confirms that existing PRoW are to be controlled within the Scheme design with PRoW management strategies set out in the **Outline Public Rights of Way and Permissive Paths Management Plan (oPROWPPMP) [APP-282]**. These are confirmed as embedded mitigation measures in Section 16.9 of ES Chapter 16. New permissive access routes have been included in the Scheme design, shown as Work No.10 on the **Works Plan [APP-007]** and shown on **ES Volume 2, Figure 3-4: Landscape and Ecology Mitigation Plan [APP-283]**. These are considered as additional mitigation and enhancement measures in Section 16.11 of ES Chapter 16. The **oPROWPPMP [APP-282]** is secured through Requirement 16 of Schedule 2 of the **Draft DCO [APP-016]**.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			The preparation, approval and implementation of the detailed CEMP and CTMP, substantially in accordance with the outline plans, are secured through Requirements 13 and 15 respectively in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that impacts on PRoW and recreational routes are appropriately managed during construction. An assessment of the effects of the Scheme on flood risk both within the Site and the surrounding area is provided in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [APP-063]**, with supporting information provided in **ES Volume 3, Appendix 11-1 to 11-9: Flood Risk Assessment and Drainage Strategy [APP-210 to APP-218]**. The assessment concludes that, with the embedded mitigation measures secured, the Scheme would not result in a material increase in off-site flood risk, including to adjacent communities and downstream receptors, and that any on-site flood risk would be managed such that the Scheme remains safe and operable for its lifetime. The assessment has been prepared in accordance with national policy and best practice guidance and in consultation with the Environment Agency and Lead Local Flood Authority and is set out in the relevant **Statement of Common Ground**to be submitted at Deadline 1. The **Outline Construction Environmental Management Plan (CEMP) [APP-277]** has been developed to control construction-phase risks and ensure there is no material increase in off-site flood risk. In accordance with NPS EN-3 (paragraph 2.10.84), the assessment differentiates between solar PV panel areas, which drain to the existing ground and therefore do not generally give rise to significant drainage effects, and associated infrastructure (for example access tracks, temporary construction compounds, substations and the BESS) where runoff controls are required. Where drainage measures are necessary, these include permeable surfacing, infiltration features, swales and attenuation

Reference	Theme	Comments/Issues Raised	Applicant's Response
			storage to manage surface water and maintain greenfield runoff behaviour, as applicable. Requirement 13 in Schedule 2 to the **Draft DCO [APP-016]** secures that part of the authorised development can commence until, a CEMP is submitted to and approved by the relevant planning authority. The CEMP must be substantially in accordance with the Outline CEMP, and all construction works associated must be carried out in accordance with the approved CEMP. Potential impacts on ecology and biodiversity are fully assessed in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**. This assessment considers baseline ecological conditions and evaluates likely significant effects arising during the construction, operation and decommissioning phases of the Scheme. It identifies avoidance, mitigation and enhancement measures to address potential impacts on habitats and protected and notable species. It also identifies opportunities for ecological enhancement, including the creation and long-term management of habitats, and delivery of biodiversity net gain. The assessment concludes that, with the identified embedded and additional mitigation measures in place, no unacceptable significant adverse effects on ecology and biodiversity are anticipated. The Applicant notes that the approach to the assessment in relation to ecology and biodiversity in general is under discussion with Wiltshire Council and Natural England and is set out in the relevant **Statements of Common Ground**to be submitted at Deadline 1. During construction, specific measures are proposed to avoid disturbance and displacement of wildlife. These include protective buffers around sensitive habitats and features, timing restrictions on vegetation clearance, pre-construction ecological surveys, species-specific mitigation, and pollution prevention controls which are set out in the **Outline Ecological Protection and Mitigation Strategy (EPMS) [APP-284]**. Measures to

Reference	Theme	Comments/Issues Raised	Applicant's Response
			protect trees and hedgerows are also set out in **ES Volume 1, Chapter 10 Arboriculture [APP-062]**. The Scheme will also result in the cessation of intensive arable farming within the Solar PV Sites. As identified in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**, this is expected to reduce the ongoing application of herbicides and pesticides, supporting improvements in habitat quality over the operational lifetime of the Scheme. The reversion of existing arable land within the Solar PV Sites to predominantly grassland habitats can be expected to benefit a wide range protected and notable species, as identified in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**. Mitigation and enhancement measures are detailed in the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]** and the **Outline Ecological Protection and Mitigation Strategy (OEPMS) [APP-284]**, which set out habitat creation, species protection measures, buffer zones and long-term ecological management. The preparation, approval and implementation of the detailed Landscape and Ecological Management Plan, substantially in accordance with the **OLEMP [APP-283]**, are secured through Requirement 7 in Schedule 2 of the **Draft Development Consent Order [APP-016]**. The preparation, approval and implementation of the detailed Ecological Protection and Mitigation Strategy, substantially in accordance with the O**EPMS [APP-284]**, are secured through Requirement 8 in Schedule 2 of the **Draft Development Consent Order [APP-016]**. These requirements ensure that ecological protection and enhancement measures are delivered and maintained throughout construction and operation of the Scheme.

6.66 Paul Kirk

Table 6-66 RR-3669

Reference	Theme	Comments/Issues Raised	Applicant's Response
PK-001	Description and DCO Process Landscape and Visual Transport and Access	I object to the plans and the project. This project will scar our beautiful countryside for generations. The traffic cannot be safely carried on our narrow country lanes and everlasting damage will be caused.	The Applicant is confident that the proposed management and mitigation measures set out in the **ES [APP-052 to APP-265]** are comprehensive and robust and that the Scheme aligns with national and local planning policy; this is outlined in the **Planning Statement [APP-267]**. Of particular relevance are Annex A: National Policy Statement Accordance Tables and Annex B: Local Policy Accordance Tables, of the Planning Statement which set out an appraisal of the Scheme against the policies. The capacity of local roads and infrastructure to accommodate construction vehicles is assessed in **ES Volume 1, Chapter 13: Transport and Access [APP-065]**, which considers construction traffic volumes, vehicle types, route suitability and network performance. The assessment concludes that, with appropriate mitigation in place, there would be no significant adverse impacts on the local highway network. Supporting technical information is provided in **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]**, which identifies specific locations where traffic management measures or passing arrangements may be required on narrower sections of construction routes. The assessment presented in Annex H of **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]** demonstrates adequate carriageway width or frequency of passing place opportunity to pass at least an HGV and a light vehicle as requested in comments provided by Wiltshire Council. All construction routes also include passing points to allow two HGVs to pass. Mitigation measures to manage construction traffic are set out in the **Outline Construction Traffic Management Plan (CTMP) [APP-287]**. The CTMP is designed to minimise the effects of construction traffic on local roads and includes measures for vehicle routing, delivery scheduling and liaison with the local highway authority.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			A road condition and dilapidation survey of minor roads not typically used by HGV traffic is included as a measure within the CTMP. Any damage to verges or carriageway surfaces caused by construction vehicles will be rectified to the satisfaction of the local highway authority. The potential effects of construction traffic on highway safety and accident risk are assessed in **ES Volume 1, Chapter 13: Transport and Access [APP-065]**, which considers changes in traffic flows, HGV movements and accident risk on the local road network. Links experiencing traffic increases above defined assessment thresholds were taken forward for detailed analysis. Supporting technical evidence is provided in **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]**, which includes an assessment of baseline accident data and predicted changes in collision risk arising from construction traffic. The assessment concludes that the level of construction traffic associated with the Scheme is unlikely to materially affect road safety on links within the Study Area, and no significant adverse effects on accident risk are anticipated. The preparation, approval and implementation of the final CTMP, substantially in accordance with the outline CTMP, are secured through Requirement 15 of Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring construction traffic impacts on local roads and infrastructure are appropriately managed throughout the construction phase of the Scheme.
PK-002	Soils and Agriculture Ecology and Biodiversity	The Project will take out of agricultural production thousands of acres, much of which is top quality productive land. There will be unquantifiable fire risks and contamination from Battery stores. The impact on wildlife will be immense and permanent.	An assessment of the potential effects of the Scheme on soils and agricultural land is provided in **ES Volume 1, Chapter 17 Soils and Agriculture [APP-069]**. This chapter considers baseline agricultural land quality, including Best and Most Versatile (BMV) land, and assesses likely significant effects arising from construction, operation and decommissioning of the Scheme, together with embedded mitigation measures. The areas of each Agricultural Land Classification (ALC) grade

Reference	Theme	Comments/Issues Raised	Applicant's Response
			affected by the Scheme are set out in **ES Chapter 17**, Section 17.7. Of the agricultural land within the Solar PV Sites, approximately 477.4 hectares (around 67%) is classified as Subgrade 3b or Grade 4 and is therefore not BMV land. There is no Grade 1 land, around 30.8 hectares (approximately 4%) of Grade 2 land, and approximately 209.3 hectares (around 29%) of Subgrade 3a land. The distribution of ALC grades is shown in **ES Volume 2, Figure 17-2: Agricultural Land Classification Mapping [APP-172]**. The Applicant has had regard to agricultural land quality in the design and site selection process and has sought, where practicable, to locate infrastructure on lower quality land. The Scheme will result in a temporary but long-term and reversible loss of agricultural land for the operational life of the Scheme. As set out in **ES Chapter 17**, Section 17.10, this gives rise to a temporary, long-term moderate adverse effect on agricultural land overall, and a temporary, long-term major/moderate adverse effect on BMV land, both of which are assessed as significant. These effects are fully reported in the ES and are a matter for the Secretary of State to weigh in the planning balance against the need for the Scheme and its wider benefits. There are no significant permanent effects on agricultural land, as all land will be returned to its original use and condition as far as practicable following decommissioning. The Applicant notes that the approach to assessing the quality of the agricultural land is under further discussion with Natural England and is set out in the relevant **Statement of Common Ground** to be submitted at Deadline 1. Measures to avoid and minimise effects on soils and agricultural land are embedded within the Scheme design and secured through the DCO. These include the preparation and implementation of a **Soil Resources Management Plan (SRMP) [APP-280]**, which will control soil handling, storage and reinstatement during construction, operation and decommissioning, and a requirement to prepare and implement

Reference	Theme	Comments/Issues Raised	Applicant's Response
			a Decommissioning Strategy in accordance with the **Outline Decommissioning Strategy [APP-279]**. Through the establishment and maintenance of long-term grassland beneath and between the solar arrays, soil health, quality and structure are anticipated to improve over the lifetime of the Scheme, resulting in a temporary, moderate beneficial effect on soil resources at decommissioning, which is assessed as significant (**ES Chapter 17**, Sections 17.10 and 17.12).
PK-003	Other Environmental Matters	There will be unquantifiable fire risks and contamination from Battery stores.	The Battery Energy Storage System (BESS) containers proposed for the Scheme will incorporate built-in safety features for fire avoidance, detection and suppression. The Scheme layout also incorporates separation distances between battery containers to ensure that any isolated fire would not become widespread or lead to a major incident. As shown on **ES Volume 2, Figure 3-1: Indicative Site Layout Plan [APP-081]**, the battery containers will be located more than 200 metres from the nearest Public Right of Way and more than 500 metres from any residential receptors. The Applicant notes that the approach to BESS safety is under discussion with Dorset and Wiltshire Fire and Rescue Service (D&WFRS) and is set out in the relevant **Statement of Common Ground** to be submitted at Deadline 1. An **Outline Battery Safety Management Plan (OBSMP) [APP-286]** has been prepared for the Scheme using guidance from Dorset and Wiltshire Fire and Rescue Service and incorporating recommendations of the National Fire Chiefs Council. The OBSMP ensures that risks associated with battery storage are appropriately mitigated. Section 6.1.1 of the OBSMP confirms that at the detailed design stage, the selected BESS will have undertaken Large Scale Fire Testing (LSFT) to fully inform inputs for risk assessment tools which will be utilised together with detailed consequence modelling to provide a comprehensive site operations and emergency response safety audit. LSFT is a mandatory

Reference	Theme	Comments/Issues Raised	Applicant's Response
			requirement under NFPA 855 (2026) safety standards to demonstrate thermal insulation protection capabilities of the BESS enclosure design, validate minimum equipment spacing distances, and demonstrate that deflagrations do not occur and/or can be safely constrained. As set out in **Outline Battery Safety Management Plan (OBSMP) [APP-286]**, the BESS Area will have a robust and validated Emergency Response Plan (ERP), developed in consultation with Dorset & Wiltshire Fire and Rescue Service at the detailed design stage. Section 5.4 of the OBSMP specifies the typical emergency response protocols, procedures and safety information that will be included in the ERP. The ERP will apply to all stages of the Scheme, including construction, operation and decommissioning. Potential effects of toxic gases arising from a BESS fire are assessed in **ES Volume 1, Chapter 15: Air Quality [APP-067]** and in **ES Volume 1, Chapter 20: Other Environmental Matters [APP-072]**, Section 20.7: Major Accidents and Disasters. An assessment of how these fumes could affect sensitive receptors within a 1 km radius of the BESS Area, including residential properties and ecological receptors, is provided in **ES Volume 1, Chapter 15: Air Quality [APP-067]**. This assessment concludes that no significant off-site impacts are predicted should a fire event occur. In the unlikely event of a fire, the precautionary measures set out in the **Outline Battery Safety Management Plan (OBSMP) [APP-286]** — including advice to remain indoors and close windows — would further reduce potential impacts to residents. The **OBSMP [APP-286]** is secured through Requirement 6 (Battery safety management) in Schedule 2 of the **Draft DCO [APP-016]**, which provides that Work No. 2 must not commence until a Battery Safety Management Plan has been submitted to and approved by the relevant planning authority. The approved plan must be substantially in accordance with the Outline Battery Safety Management Plan. The Draft DCO also requires the

Reference	Theme	Comments/Issues Raised	Applicant's Response
			relevant planning authority to consult with Dorset and Wiltshire Fire and Rescue Service and the Environment Agency before determining the application, and that the Battery Safety Management Plan must be implemented as approved.
PK-004	Ecology and Biodiversity	The impact on wildlife will be immense and permanent.	Potential impacts on ecology and biodiversity are fully assessed in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**. This assessment considers baseline ecological conditions and evaluates likely significant effects arising during the construction, operation and decommissioning phases of the Scheme. It identifies avoidance, mitigation and enhancement measures to address potential impacts on habitats and protected and notable species. It also identifies opportunities for ecological enhancement, including the creation and long-term management of habitats, and delivery of biodiversity net gain. The assessment concludes that, with the identified embedded and additional mitigation measures in place, no unacceptable significant adverse effects on ecology and biodiversity are anticipated. The Applicant notes that the approach to the assessment in relation to ecology and biodiversity in general is under discussion with Wiltshire Council and Natural England and is set out in the relevant **Statements of Common Ground** to be submitted at Deadline 1. During construction, specific measures are proposed to avoid disturbance and displacement of wildlife. These include protective buffers around sensitive habitats and features, timing restrictions on vegetation clearance, pre-construction ecological surveys, species-specific mitigation, and pollution prevention controls which are set out in the **Outline Ecological Protection and Mitigation Strategy (EPMS) [APP-284]**. Measures to protect trees and hedgerows are also set out in **ES Volume 1, Chapter 10 Arboriculture [APP-062]**. The Scheme will also result in the cessation of intensive arable farming within the Solar PV Sites. As identified in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**, this is expected to reduce the ongoing application of herbicides and

Reference	Theme	Comments/Issues Raised	Applicant's Response
			pesticides, supporting improvements in habitat quality over the operational lifetime of the Scheme. The reversion of existing arable land within the Solar PV Sites to predominantly grassland habitats can be expected to benefit a wide range protected and notable species, as identified in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**. Mitigation and enhancement measures are detailed in the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]** and the **Outline Ecological Protection and Mitigation Strategy (OEPMS) [APP-284]**, which set out habitat creation, species protection measures, buffer zones and long-term ecological management. The preparation, approval and implementation of the detailed Landscape and Ecological Management Plan, substantially in accordance with the **OLEMP [APP-283]**, are secured through Requirement 7 in Schedule 2 of the **Draft Development Consent Order [APP-016]**. The preparation, approval and implementation of the detailed Ecological Protection and Mitigation Strategy, substantially in accordance with the O**EPMS [APP-284]**, are secured through Requirement 8 in Schedule 2 of the **Draft Development Consent Order [APP-016]**. These requirements ensure that ecological protection and enhancement measures are delivered and maintained throughout construction and operation of the Scheme.

6.67 Julian Philip Edwin Brunt

Table 6-67 RR-2517

Reference	Theme	Comments/Issues Raised	Applicant's Response
JPEB-001	Cumulative Effects Landscape and Visual Transport and Access	1/ DESTRUCTION OF THE COUNTRYSIDE 2/ CUMULATIVE IMPACT - HIGH CONCENTRATION OF SOLAR PARKS IN THIS AREA! 3/ TRANSPORT ROUTES HAVE A DETRIMENTAL IMPACT ON HERITAGE ASSETS - TRABSPORT PLANS UNENFORCABLE.	The Applicant is confident that the proposed management and mitigation measures set out in the **ES [APP-052 to APP-265]** are comprehensive and robust and that the Scheme aligns with national and local planning policy; this is outlined in the **Planning Statement [APP-267]**. Of particular relevance are Annex A: National Policy Statement Accordance Tables and Annex B: Local Policy Accordance Tables, of the Planning Statement which set out an appraisal of the Scheme against the policies. Cumulative effects with other projects has been carefully considered as part of the Scheme with other projects, both existing and proposed, taken into account. In terms of the Lime Down project, a comprehensive Cumulative and In-Combination Effects Assessment has been undertaken in accordance with Planning Inspectorate Advice Note 17 and the relevant NPS EN-1, NPS EN-3 and NPS EN-5 requirements which are set out within **ES Volume 1, Chapter 21: Cumulative and In-Combination Effects [APP-074]** and associated appendices**, ES Volume 3, Appendix 21-1 Long List of In-Combination Effects and Cumulative Developments [APP-264]**. Interaction with proposed or consented but not yet built developments has been fully explored within each of the technical assessments **[APP-059 - APP-072]** with a summary of each of these assessments provided within **ES Volume 1, Chapter 21 In-Combination and Cumulative Effects [APP-073]**. Existing schemes are captured within the baseline environment. The four stage cumulative assessment methodology is described within **ES Volume 1, Chapter 6: EIA Methodology [APP-058]**. 358 developments were included in the **Long List [APP-264]**. 41 developments are included in the short list (and are therefore assessed) including a number of proposed solar and BESS developments. The list of developments included in the cumulative assessment was reviewed and developed in consultation with Wiltshire Council. Taking a conservative worse case approach, significant cumulative effects are identified at a limited and discrete number

Reference	Theme	Comments/Issues Raised	Applicant's Response
			of receptors comprising tourism and recreation impacts during the construction phase on Corsham Park, PRoW WT|CORM|122, long path and Sustrans Cycle Route 403, and on skylark at a District level. Skylark-specific mitigation and habitat enhancement measures are incorporated into the Scheme design to reduce effects on skylark as far as practicable and are described in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061].** These include the provision of suitably large, open set-aside and grassland habitats designed to provide suitable skylark breeding and foraging conditions. These measures are illustrated in **ES Volume 2, Figure 3-4: Landscape and Ecological Mitigation Plan [APP-084]** and detailed in the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]**. Such measures have been designed to reduce the anticipated residual effects resulting from the Scheme to a Local level of geographic importance. The potential effects of the Scheme on the cultural heritage of the Fosse Way and associated Roman archaeological assets are fully assessed in **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, supported by detailed technical appendices in **ES Volume 3, Appendices 12-1 to 12-7 [APP-219 to APP-231]**. The assessment identifies known Roman heritage assets, considers their significance, and evaluates likely effects during construction, operation and decommissioning, including effects on setting. **Appendix 12.1: Heritage Statement [APP-219]** identified that the overall setting and significance of the Fosse Way will remain intact, and the asset will retain its legibility as a roadway within a largely agrarian landscape. Consequently, no significant effects were identified to the asset. Since the design presented at PEIR stage, Field C26, the westernmost part of Field C25, and the majority of Field C13 have been entirely removed from the Order Limits. Solar PV Panels have also been removed entirely from within Fields B1-B5, C24-C25, and C13. A number of fields abutting the Fosse Way within which Solar PV Panels will be erected have had offsets established with their boundaries with Fosse Way,

Reference	Theme	Comments/Issues Raised	Applicant's Response
			including Fields B6, C10-C12, and C22-C23. **Appendix 12.1: Heritage Statement [APP-219]** identified that the overall setting and significance of the Fosse Way will remain intact, and the asset will retain its legibility as a roadway within a largely agrarian landscape. Consequently, no significant effects were identified to the asset. Embedded mitigation measures to avoid or reduce harm to heritage assets are set out in Section 12.9 of **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, with additional mitigation detailed in Section 12.11. An overarching archaeological mitigation strategy is provided in **ES Volume 3, Appendix 12-6: Outline Archaeological Mitigation Strategy [APP-230]**. The potential effects of construction traffic on the local highway network, including the Fosse Way, are assessed in **ES Volume 1, Chapter 13: Transport and Access [APP-065]**. The assessment considers construction vehicle routing, traffic volumes, road safety and effects on road users, and concludes that, with appropriate mitigation in place, construction traffic would not give rise to unacceptable impacts on the operation or safety of the Fosse Way. Construction vehicle movements will be managed through a Construction Traffic Management Plan. An **Outline Construction Traffic Management Plan (CTMP) [APP-277]** has been prepared and submitted with the Application. The CTMP sets out measures to ensure that the effect of construction traffic on the local highway network is minimised, including defined construction access points, approved HGV routes, coordination of deliveries, and timing restrictions to avoid peak traffic periods where practicable. The CTMP also includes a road condition and dilapidation survey of minor roads not typically used by HGV traffic. Any damage to verges or carriageway surfaces caused by construction vehicles will be rectified to the satisfaction of the local highway authority.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			In addition, the CTMP includes community liaison measures to keep local communities informed on construction activity and to provide a contact point for feedback should any issues arise. The preparation, approval and implementation of the final CTMP, substantially in accordance with the outline CTMP, are secured through Requirement 15 of Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring construction traffic effects on the Fosse Way are appropriately managed throughout the construction phase.

6.68 Melanie Sturgess

Table 6-68 RR-3131

Reference	Theme	Comments/Issues Raised	Applicant's Response
MSS-001	Hydrology, Flood Risk and Drainage Landscape and Visual Transport and Access	I believe the ground will become contaminated and leach into the water table and rivers. There will be and adverse affect the ecology and biodiversity including the wildlife not being able to move as normal due to high fences surrounding the solar panels. Lastly the amount of extra heavy traffic in the construction phase.	Potential effects of the Scheme on water quality and contamination risk are addressed in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [APP-063]**, which sets out mitigation and management measures to protect water quality during construction and operation. These measures include pollution prevention controls, containment systems, emergency response protocols, and site-specific drainage measures, particularly around the Battery Energy Storage System (BESS) and substations where lined drainage and automatically actuating valves are proposed. The Applicant notes that the approach to pollution resulting from battery fire is under discussion with both the Environment Agency and the Lead Local Flood Authority (LLFA) and is set out in the relevant **Statement of Common Ground** to be submitted at Deadline 1. Mitigation measures to control contamination risk during construction are set out in the **Outline Construction Environmental Management Plan [APP-277]**. Routine maintenance and panel cleaning will use minimal water and no detergents or chemical cleaning agents, in line with industry standards and best practice, so there is no expected risk from cleaning runoff. In addition, the removal of agrichemical inputs through the cessation of farming activities will further reduce contamination risks compared to existing use. The preparation, approval and implementation of a Construction Environmental Management Plan substantially in accordance with the **Outline Construction Environmental Management Plan [APP-277]** is secured through Requirement 13 in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that construction works are carried out in accordance with the approved CEMP and that contamination risks are appropriately managed throughout construction of the Scheme. Potential effects of boundary treatments and fencing on ecology and wildlife movement are assessed in **ES Volume 1, Chapter 9:**

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Ecology and Biodiversity [APP-061], which considers impacts on habitats and species during construction, operation and decommissioning and identifies measures to avoid or mitigate barriers to wildlife movement. The Scheme design incorporates fencing around the Solar PV Arrays that is permeable to wildlife, with the exception of deer. This means animals (excluding deer only) will be able to freely access habitats within the Solar PV Sites without the need for wildlife gates. In addition, wide buffers are retained around the peripheries of the Solar PV Sites to allow wildlife, including deer, to move between favoured habitats. These measures are described in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]** and detailed in the **Outline Ecological Protection and Mitigation Strategy (OEPMS) [APP-284]**. Fencing will be subject to regular inspection and maintenance to ensure continued permeability to wildlife and effective functioning over the lifetime of the Scheme. Measures for ongoing ecological management and maintenance are set out in the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]**. The preparation, approval and implementation of the detailed Ecological Protection and Mitigation Strategy and Landscape and Ecological Management Plan, substantially in accordance with the **EPMS [APP-284]** and **OLEMP [APP-283]**, are secured through Requirements 8 and 7 respectively in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that fencing design and maintenance measures are delivered and maintained throughout the lifetime of the Scheme. The potential effects of construction traffic on the local highway network are assessed in **ES Volume 1, Chapter 13: Transport and Access [APP-065]**, which considers construction vehicle movements, traffic volumes, road safety and effects on road users. This included the capacity of local roads and infrastructure to accommodate construction vehicles with consideration of

Reference	Theme	Comments/Issues Raised	Applicant's Response
			construction traffic volumes, vehicle types, route suitability, and network performance. The assessment concludes that the level of construction traffic associated with the Scheme is unlikely to materially affect road safety on links within the Study Area, and no significant adverse effects on accident risk are anticipated. The assessment additionally concludes that with appropriate mitigation such as the Construction Traffic Management Plan in place to manage construction vehicle movements, there would be no significant adverse impacts on the local highway network during the construction, operation maintenance, and decommissioning phases of the Scheme. An **Outline Construction Traffic Management Plan (CTMP) [APP-287]** has been prepared and submitted with the DCO application. The aim of the CTMP is to ensure **that the effect of the construction phase on the local highway network is minimised.** The **Outline CTMP [APP-287]** sets out measures to coordinate construction deliveries by HGVs to arrive and depart between 09:30 and 16:30 where possible, to avoid peak network hours of 08:00–09:00 and 17:00–18:00. It also includes a community liaison element to keep local communities informed about the construction process and to provide a contact for feedback should any issues arise. Compliance with the CTMP will be monitored by the Developer, Contractor and Wiltshire Council as local highway authority. The preparation, approval and implementation of the final CTMP, substantially in accordance with the outline CTMP, are secured through Requirement 15 of Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring construction traffic impacts are appropriately managed throughout the construction phase of the Scheme.

6.69 Brendan Leo McCarron

Table 6-69 RR-0524

Reference	Theme	Comments/Issues Raised	Applicant's Response
BLMC-001	Site selection and Alternatives	I am completely opposed to the scale of this development on good farmland.	The Scheme has been designed to deliver the greatest possible benefit from the available land and the available grid connection, whilst avoiding, minimising and/or mitigating harmful environmental effects. As per the description set out in **ES Volume 1, Chapter 3: The Scheme [APP-055]** the total area within the DCO Order Limits encompasses approximately 1,237 hectares (ha). Of this, the 'Solar PV Sites' comprise approximately 749.1 ha of land. Around 479.5 ha of this land is proposed as being required for installation of solar PV, battery storage, and associated infrastructure. The remaining 269.5 ha would provide areas dedicated to ecological mitigation, measurable Biodiversity Net Gain (BNG) delivery, landscaping, offsets and agricultural land managed for environmental enhancement and habitat creation. The Applicant remains committed to delivering a Scheme that makes a meaningful contribution to the UK's transition to net zero, while also seeking to minimise adverse impacts and maximise opportunities for environment. An assessment of the potential effects of the Scheme on soils and agricultural land is provided in **ES Volume 1, Chapter 17 Soils and Agriculture [APP-069]**. This chapter considers baseline agricultural land quality, including Best and Most Versatile (BMV) land, and assesses likely significant effects arising from construction, operation and decommissioning of the Scheme, together with embedded mitigation measures. The areas of each Agricultural Land Classification (ALC) grade affected by the Scheme are set out in Section 17.7 of **ES Volume 1 Chapter 17: Soils and Agriculture [APP-069]**. Of the agricultural land within the Solar PV Sites, approximately 477.4 hectares (around 67%) is classified as Subgrade 3b or Grade 4 and is therefore not BMV land. There is no Grade 1 land, around 30.8 hectares (approximately 4%) of Grade 2 land, and approximately 209.3 hectares (around 29%) of Subgrade 3a land. The distribution of ALC grades is shown in **ES Volume 2, Figure**

Reference	Theme	Comments/Issues Raised	Applicant's Response
			17-2: Agricultural Land Classification Mapping [APP-172]. The Applicant has had regard to agricultural land quality in the design and site selection process and has sought, where practicable, to locate infrastructure on lower quality land. The Scheme will result in a temporary but long-term and reversible loss of agricultural land for the operational life of the Scheme. As set out in **ES Volume 1, Chapter 17: Soils and Agriculture [APP-069]**, Section 17.10, this gives rise to a temporary, long-term moderate adverse effect on agricultural land overall, and a temporary, long-term major/moderate adverse effect on BMV land, both of which are assessed as significant. These effects are fully reported in the ES and are a matter for the Secretary of State to weigh in the planning balance against the need for the Scheme and its wider benefits. There are no significant permanent effects on agricultural land, as all land will be returned to its original use and condition as far as practicable following decommissioning. The Applicant notes that the approach to assessing the quality of the agricultural land is under further discussion with Natural England and is set out in the relevant **Statement of Common Ground**to be submitted at Deadline 1. Measures to avoid and minimise effects on soils and agricultural land are embedded within the Scheme design and secured through the DCO. These include the preparation and implementation of a **Soil Resources Management Plan (SRMP) [APP-280]**, which will control soil handling, storage and reinstatement during construction, operation and decommissioning, and a requirement to prepare and implement a Decommissioning Strategy in accordance with the **Outline Decommissioning Strategy [APP-279]**. Through the establishment and maintenance of long-term grassland beneath and between the solar arrays, soil health, quality and structure are anticipated to improve over the lifetime of the Scheme, resulting in a temporary, moderate beneficial

Reference	Theme	Comments/Issues Raised	Applicant's Response
			effect on soil resources at decommissioning, which is assessed as significant (Sections 17.10 and 17.12 of **ES Volume 1, Chapter 17: Soils and Agriculture [APP-069]**).
BLMC-002	Climate Change and Energy Need Description and DCO Process	I have not seen a proper cost benefit analysis including externalities for this project created in accordance with Treasury Green Book principles but I believe that it will have a Net Present Social Cost when the negative externalities are considered.	The Applicant notes this comment. The socio-economic effects of the Scheme, including its costs and benefits, are assessed in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** and justified within the **Statement of Need [APP-266]** and the **Planning Statement [APP-267]**. There is no statutory requirement within the National Policy Statements (NPS) for a privately funded Nationally Significant Infrastructure Project (NSIP) to provide a cost-benefit analysis in accordance with Treasury Green Book principles. The **Funding Statement [APP-019]** submitted with the DCO application demonstrates that the Scheme is financially viable and adequately funded to deliver the Scheme in full.

6.70 Jessica Phillips

Table 6-70 RR-2261

Reference	Theme	Comments/Issues Raised	Applicant's Response
JP-001	Description and DCO Process Ecology and Biodiversity Transport and Access Socio-Economics, Tourism and Recreation	I object to the lime down solar project and the impact this will have on wildlife, traffic, tourism and day to day life for everyone living in the villages which undoubtably will be affected by this monstrosity of an idea.	Wildlife Potential impacts on ecology and biodiversity are fully assessed in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**. This assessment considers baseline ecological conditions and evaluates likely significant effects arising during the construction, operation and decommissioning phases of the Scheme. It identifies avoidance, mitigation and enhancement measures to address potential impacts on habitats and protected and notable species. It also identifies opportunities for ecological enhancement, including the creation and long-term management of habitats, and delivery of biodiversity net gain. The assessment concludes that, with the identified embedded and additional mitigation measures in place, no unacceptable significant adverse effects on ecology and biodiversity are anticipated. The Applicant notes that the approach to the assessment in relation to ecology and biodiversity in general is under discussion with Wiltshire Council and Natural England and is set out in the relevant **Statements of Common Ground** to be submitted at Deadline 1. During construction, specific measures are proposed to avoid disturbance and displacement of wildlife. These include protective buffers around sensitive habitats and features, timing restrictions on vegetation clearance, pre-construction ecological surveys, species-specific mitigation, and pollution prevention controls which are set out in the **Outline Ecological Protection and Mitigation Strategy (EPMS) [APP-284]**. Measures to protect trees and hedgerows are also set out in **ES Volume 1, Chapter 10 Arboriculture [APP-062]**. The Scheme will also result in the cessation of intensive arable farming within the Solar PV Sites. As identified in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**, this is expected to reduce the ongoing application of herbicides and pesticides, supporting improvements in habitat quality over the operational lifetime of the Scheme. The reversion of existing

Reference	Theme	Comments/Issues Raised	Applicant's Response
			arable land within the Solar PV Sites to predominantly grassland habitats can be expected to benefit a wide range protected and notable species, as identified in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**. Mitigation and enhancement measures are detailed in the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]** and the **Outline Ecological Protection and Mitigation Strategy (OEPMS) [APP-284]**, which set out habitat creation, species protection measures, buffer zones and long-term ecological management. The preparation, approval and implementation of the detailed Landscape and Ecological Management Plan, substantially in accordance with the **OLEMP [APP-283]**, are secured through Requirement 7 in Schedule 2 of the **Draft Development Consent Order [APP-016]**. The preparation, approval and implementation of the detailed Ecological Protection and Mitigation Strategy, substantially in accordance with the O**EPMS [APP-284]**, are secured through Requirement 8 in Schedule 2 of the **Draft Development Consent Order [APP-016]**. These requirements ensure that ecological protection and enhancement measures are delivered and maintained throughout construction and operation of the Scheme. <u>Traffic</u> The potential effects of construction traffic on the local highway network are assessed in **ES Volume 1, Chapter 13: Transport and Access [APP-065]**, which considers construction vehicle movements, traffic volumes, road safety and effects on road users. This included the capacity of local roads and infrastructure to accommodate construction vehicles with consideration of construction traffic volumes, vehicle types, route suitability, and network performance. The assessment concludes that the level of construction traffic associated with the Scheme is unlikely to materially affect road

Reference	Theme	Comments/Issues Raised	Applicant's Response
			safety on links within the Study Area, and no significant adverse effects on accident risk are anticipated. The assessment additionally concludes that with appropriate mitigation such as the Construction Traffic Management Plan in place to manage construction vehicle movements, there would be no significant adverse impacts on the local highway network during the construction, operation maintenance, and decommissioning phases of the Scheme. An **Outline Construction Traffic Management Plan (CTMP) [APP-287]** has been prepared and submitted with the DCO application. The aim of the CTMP is to ensure that the effect of the construction phase on the local highway network is minimised. The **Outline CTMP [APP-287]** sets out measures to coordinate construction deliveries by HGVs to arrive and depart between 09:30 and 16:30 where possible, to avoid peak network hours of 08:00–09:00 and 17:00–18:00. It also includes a community liaison element to keep local communities informed about the construction process and to provide a contact for feedback should any issues arise. Compliance with the CTMP will be monitored by the Developer, Contractor and Wiltshire Council as local highway authority. The preparation, approval and implementation of the final CTMP, substantially in accordance with the outline CTMP, are secured through Requirement 15 of Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring construction traffic impacts are appropriately managed throughout the construction phase of the Scheme. <u>Tourism</u> The potential effects of the Scheme on tourism and recreation are assessed in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]**, supported by **ES Volume**

Reference	Theme	Comments/Issues Raised	Applicant's Response
			3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]. The assessment considers baseline tourism activity, visitor attractions, recreational assets and tourism-dependent businesses within the study area. The assessment evaluates potential effects on the use, enjoyment and desirability of nearby tourism destinations, including impacts on individual visitor attractions, recreational routes, events and businesses reliant on tourism. It also considers whether changes to landscape character or visual amenity could influence visitor behaviour. The assessment identifies a worst-case scenario in which a temporary loss of up to 50 tourism-related jobs could occur locally during construction, and a long-term loss of up to 11 tourism-related jobs could occur during the operational phase of the Scheme. This represents a precautionary estimate based on conservative assumptions. The assessment concludes that, while some localised effects on tourism receptors are anticipated to occur, significant adverse effects on the wider tourism economy are not anticipated. These findings are fully reported in the ES and will be weighed in the planning balance alongside the Scheme's wider economic and environmental benefits. The Applicant notes that the approach to assessment of tourism impacts is under discussion with Wiltshire Council's Economic and Regeneration Team and is set out in the Statement of Common Ground with Wiltshire Councilto be submitted at Deadline 1. <u>Community</u> The Applicant acknowledges that there will be impacts on the community as a result of the Scheme, which may be a source of concern for local residents. The Secretary of State will balance those potential impacts and changes against the urgent need and

Reference	Theme	Comments/Issues Raised	Applicant's Response
			critical national priority for the Scheme as set out in Government policy. The Applicant has assessed adverse impacts arising from the Scheme and has also set out within the **Environmental Statement [APP-052 – APP-065]** the steps taken to avoid, mitigate and minimise these impacts as far as possible, and has prepared a number of management plans that will ensure that impacts are kept to a minimum. These management plans are secured in the **Draft Development Consent Order [APP-016]**. Of particular relevance to the assessment of effects on local communities are **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**, **Chapter 13: Transport and Access [APP-065], Chapter 14: Noise and Vibration [APP-066], Chapter 15: Air Quality [APP-067], Chapter 16: Socioeconomics, Tourism and Recreation [APP-068], and Chapter 18: Human Health [APP-070]**, all of which consider potential impact
JP-002	Site selection and Alternatives Landscape and Visual	The sheer size and scale of this project along with the noise and height of the panels will significantly impact the environment. To be clear I do support solar (on roofs!)	The Scheme has been designed to deliver the greatest possible benefit from the available land and the available grid connection, whilst avoiding, minimising and/or mitigating harmful environmental effects. As per the description set out in **ES Volume 1, Chapter 3: The Scheme [APP-055]** the total area within the DCO Order Limits encompasses approximately 1,237 hectares (ha). Of this, the 'Solar PV Sites' comprise approximately 749.1 ha of land. Around 479.5 ha of this land is proposed as being required for installation of solar PV, battery storage, and associated infrastructure. The remaining 269.5 ha would provide areas dedicated to ecological mitigation, measurable Biodiversity Net Gain (BNG) delivery, landscaping, offsets and agricultural land managed for environmental enhancement and habitat creation. The Applicant remains committed to delivering a Scheme that makes a meaningful contribution to the UK's transition to net zero, while also seeking to minimise adverse impacts and maximise opportunities for environment. The noise impacts from the operation of the Scheme and its

Reference	Theme	Comments/Issues Raised	Applicant's Response
			components are assessed in Section 14.10 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**, with supporting modelling provided in **ES Volume 3, Appendix 14-4: Noise Modelling [APP-237]**. A penalty has been applied to predicted noise levels from the Solar PV Sites to account for the distinctive nature of the sound. Potential mitigation measures are detailed in Section 14.9 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**, and with such measures in place, significant effects from operational noise are not expected. The **Outline Operational Environmental Management Plan [APP-278]** commits to noise levels from the Scheme at residential dwellings being the same as or below those modelled in the ES. This provides assurance that significant effects from operational noise will be avoided, while allowing flexibility in how this is achieved. The preparation, approval and implementation of the detailed OEMP, substantially in accordance with the outline plan, are secured through Requirement 14 of Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring operational noise is appropriately controlled throughout the lifetime of the Scheme. The height of the solar PV panels has been assessed using clearly defined design parameters, including a maximum height of 4.5 metres above ground level at maximum tilt, as set out in **ES Volume 1, Chapter 3: The Scheme [APP-055]**. These parameters represent a realistic worst-case scenario for the purposes of the Environmental Impact Assessment. The landscape and visual effects of the Scheme, including the effects of the maximum panel height, are assessed in the Landscape and Visual Impact Assessment (LVIA) presented in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**. The LVIA assesses effects on identified landscape and visual receptors during construction, operation and decommissioning, using the maximum design parameters to ensure a robust

Reference	Theme	Comments/Issues Raised	Applicant's Response
			assessment. Mitigation measures to address landscape and visual effects, including measures that reduce the perceived height and prominence of panels in views, are set out in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**, Figure 3-4-1 to 3-4-5.2 **Landscape and Ecology Mitigation Plan [APP-084]** and detailed within the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]**. These include new and enhanced planting, retention of existing hedgerows and woodland, and landscape integration measures to reduce visual effects over time. The preparation, approval and implementation of the detailed Landscape and Ecological Management Plan, substantially in accordance with the **OLEMP [APP-283]**, are secured through Requirement 7 in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that the identified mitigation measures are delivered and maintained throughout the lifetime of the Scheme. In relation to suggestions that brownfield land or alternative locations should be used, including rooftop, these matters are addressed in **ES Volume 1, Chapter 4 Alternatives and Design Evolution** and in the **Statement of Need [APP-056 and APP-266]**. The Applicant has considered alternatives, including previously developed land and other forms of solar deployment, as part of the site selection and design evolution process. As shown in Table 2-2 of **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]**, the Applicant has considered previously developed land/brownfield land over 1 hectare within the area of search, based on the brownfield land registers of the relevant Local Planning Authorities, and concluded that none of the sites are large enough to provide a viable land parcel of at least 40 ha and sites were not considered to be available as they have planning permission for residential development and/or are allocated for residential/mixed use development.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			National policy and government guidance, as set out in the **Statement of Need [APP-266]**, recognise that while rooftop and smaller-scale solar installations are an important part of the energy mix, they cannot alone meet the scale of capacity required to achieve clean power and net zero objectives. Large-scale ground-mounted solar therefore remains necessary in addition to, not instead of, rooftop solar.

6.71 Susannah Dibben

Table 6-71 RR-4591

Reference	Theme	Comments/Issues Raised	Applicant's Response
SD-001	Site selection and Alternatives Soils and Agriculture Transport and Access	The huge scale and sprawling nature of the Limedown proposed scheme means that the transforming effect it will have on the area I have lived in for 28 years will be massive and this causes me great anguish. This pocket of North Wiltshire is rural and agricultural with plenty of character and charm - this will be destroyed. The lanes are already under pressure from growing car use and delivery drivers alongside the essential farm traffic. The Limedown logistics will bring this situation to breaking point.	The Applicant is confident that the proposed management and mitigation measures set out in the **ES [APP-052 to APP-265]** are comprehensive and robust and that the Scheme aligns with national and local planning policy; this is outlined in the **Planning Statement [APP-267]**. Of particular relevance are Annex A: National Policy Statement Accordance Tables and Annex B: Local Policy Accordance Tables, of the Planning Statement which set out an appraisal of the Scheme against the policies. The potential effects of construction traffic on the local highway network are assessed in **ES Volume 1, Chapter 13: Transport and Access [APP-065]**, which considers construction vehicle movements, traffic volumes, road safety and effects on road users. This included the capacity of local roads and infrastructure to accommodate construction vehicles with consideration of construction traffic volumes, vehicle types, route suitability, and network performance. The assessment concludes that the level of construction traffic associated with the Scheme is unlikely to materially affect road safety on links within the Study Area, and no significant adverse effects on accident risk are anticipated. The assessment additionally concludes that with appropriate mitigation such as the Construction Traffic Management Plan in place to manage construction vehicle movements, there would be no significant adverse impacts on the local highway network during the construction, operation maintenance, and decommissioning phases of the Scheme. An **Outline Construction Traffic Management Plan (CTMP) [APP-287]** has been prepared and submitted with the DCO application. The aim of the CTMP is to ensure that the effect of the construction phase on the local highway network is minimised. CTMP will be monitored by the Developer, Contractor and Wiltshire Council as local highway authority. The preparation, approval and implementation of the final CTMP,

Reference	Theme	Comments/Issues Raised	Applicant's Response
			substantially in accordance with the outline CTMP, are secured through Requirement 15 of Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring construction traffic impacts are appropriately managed throughout the construction phase of the Scheme.
SD-002	Cultural Heritage	Our local cultural heritage is rich - Malmesbury Abbey, the Athelstan Way, the Fosse Way, various Medieval sites - these will be smothered by a bleak industrial landscape that is totally at odds with the Area's historical importance.	The potential effects of the Scheme on cultural heritage, including the Fosse Way and archaeological assets dated to the Roman and medieval periods, are fully assessed in **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, supported by detailed technical appendices in **ES Volume 3, Appendices 12-1 to 12-7 [APP-219 to APP-231]**. The chapter considers baseline conditions, identifies built and archaeological heritage assets within the study area, and assesses likely effects during construction, operation and decommissioning, including effects on setting. The assessment is underpinned by extensive desk-based research, geophysical survey and evaluation trenching, as detailed in **ES Volume 3, Appendix 12-2: Archaeological Desk-Based Assessments [APP-220], Appendix 12-4: Archaeological Geophysical Survey Reports [APP-224], and Appendix 12-5: Interim Evaluation Trial Trenching Reports [APP-225].** The Applicant notes that the approach to the assessment has been agreed with Wiltshire Council and the methodology for the mitigation strategy is under discussion with Wiltshire Council and is set out in the relevant **Statement of Common Ground**to be submitted at Deadline 1. Since the design presented at PEIR stage, Field C26, the westernmost part of Field C25, and the majority of Field C13 have been entirely removed from the Order Limits. Solar PV Panels have also been removed entirely from within Fields B1-B5, C24-C25, and C13. A number of fields abutting the Fosse Way within which Solar PV Panels will be erected have had offsets established with their boundaries with Fosse Way, including Fields B6, C10-C12, and C22-C23. **Appendix 12.1:**

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Heritage Statement [APP-219] identified that the overall setting and significance of the Fosse Way will remain intact, and the asset will retain its legibility as a roadway within a largely agrarian landscape. Consequently, no significant effects were identified to the asset. Embedded mitigation measures to avoid or reduce harm to heritage assets are set out in Section 12.9 of **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, with additional mitigation measures detailed in Section 12.11. An overarching archaeological mitigation strategy is provided in **ES Volume 3, Appendix 12-6: Outline Archaeological Mitigation Strategy [APP-230]**, which sets out the framework for further archaeological investigation, recording and protection where ground disturbance cannot be avoided. The preparation, approval and implementation of detailed archaeological Written Schemes of Investigation, substantially in accordance with the Outline Archaeological Mitigation Strategy, are secured through Requirement 12 of Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that appropriate protection, recording and mitigation are delivered before and during construction.
SD-003	Ecology and Biodiversity	In Area E, where I live, the ancient woodlands, hedgerows, undulating ridge and furrow fields are home to a plethora of English wildlife - including hares, deer, foxes, Barn, Little and Tawny owls, otters. There are wild orchids in the spring and carpets of cowslips after the snowdrops and bluebells. Indeed, the area is so rich and vital as an ecological haven that one of the ancient pastures is a registered SSI site. To witness the destruction of this habitat will be soul-destroying.	Potential impacts on ecology and biodiversity are fully assessed in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**. This assessment considers baseline ecological conditions and evaluates likely significant effects arising during the construction, operation and decommissioning phases of the Scheme. It identifies avoidance, mitigation and enhancement measures to address potential impacts on habitats and protected and notable species. It also identifies opportunities for ecological enhancement, including the creation and long-term management of habitats, and delivery of biodiversity net gain. The assessment concludes that, with the identified embedded and additional mitigation measures in place, no unacceptable significant adverse effects on ecology and biodiversity are anticipated.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			As described in paragraphs 9.10.58 to 9.10.65 of **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**, a buffer zone of at least 15 m will be maintained between the Harries Ground, Rodbourne SSSI boundary and any development. This is greater than the existing field margin which lies between the cultivated arable habitat and the SSSI boundary, which is approximately 5 m wide. The establishment of diverse grassland habitat within this buffer zone, as well as the general reversion of the arable fields which dominate the Solar PV Sites to grassland (for the lifetime of the Scheme) is considered likely to result in a significant beneficial effect in the extent and quality of grassland habitats within the Solar PV Sites which may provide supporting habitat for species associated with the SSSI, and thus strengthen the ecological integrity of the designated site.

6.72 Susan Hunt

Table 6-72 RR-4557

Reference	Theme	Comments/Issues Raised	Applicant's Response
SH-001	Landscape and Visual	I am very concerned about the effect if granted this monstrous invasion of the local countryside will bring. As a landowner that limedown wish to carry out cable surveys on my land I am upset of the tone of their communication almost threatening I comply, I am a pensioner and my late husband worked hard for this land and his ashes were spread within and Linedown show no redirect or consideration and selfishly want to attack the solar site and surrounding villages jot only with the blight on the countryside landscape but also on the infrastructure surrounding.	The Applicant notes the comments made. For clarification, the Respondent's land is no longer affected by the Scheme and no works are proposed on their land. Regarding the landscape and visual impact of the Scheme, an assessment of landscape and visual effects is provided in the Landscape and Visual Impact Assessment (LVIA) presented in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**. The LVIA assesses effects on identified landscape and visual receptors, including residential properties and users of public rights of way, and identifies where significant effects may occur. The LVIA found no significant long term visual effects to Residential Properties as a consequence of the Scheme. The scale of development within the Order Limits has been significantly reduced from the layout assessed in the Preliminary Environmental Information Report (PEIR) through an iterative design process undertaken in response to consultation and in accordance with the mitigation hierarchy to avoid, reduce and mitigate adverse effects. As part of this design evolution, panels along the edge of the Cotswolds National Landscape and along the Fosse Way have been removed. Mitigation measures to address landscape and visual effects are set out in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**, Figure 3-4-1 to 3-4-5.2 **Landscape and Ecology Mitigation Plan [APP-084]** and detailed within the **Outline Landscape and Ecological Mitigation Plan (LEMP) [APP-283]** and the **Outline Ecological Protection and Mitigation Strategy (EPMS) [APP-284]**. These documents include proposals for new and enhanced planting, retention of existing hedgerows and woodland, and landscape integration measures to reduce visual effects over time. In addition, the Scheme design incorporates minimum offsets from existing landscape features, including residential properties, ancient woodland, woodland, hedgerows, public rights of way

Reference	Theme	Comments/Issues Raised	Applicant's Response
			and watercourses, to further limit visual impacts. The preparation, approval and implementation of detailed landscape and ecological management plans, substantially in accordance with the **OLEMP [APP-283]** and **EPMS [APP-284]**, are secured through requirements in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that the identified mitigation measures are delivered and maintained throughout the lifetime of the Scheme.

6.73 Edward Hall

Table 6-73 RR-1241

Reference	Theme	Comments/Issues Raised	Applicant's Response
EH-001	Ecology and Biodiversity Description and DCO Process	This project will permanently damage a very beautiful part of England's countryside. It will have a lasting detrimental impact on residents in the area, wildlife, and the natural beauty of this part of the Cotswolds. This is a profit motivated scheme, with almost no regard the real welfare of the locality.	Landscape and Visual An assessment of landscape and visual effects is provided in the Landscape and Visual Impact Assessment (LVIA) presented in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**. The LVIA assesses effects on identified landscape and visual receptors, including residential properties and users of public rights of way, and identifies where significant effects may occur. The LVIA found no significant long term visual effects to Residential Properties as a consequence of the Scheme. The scale of development within the Order Limits has been significantly reduced from the layout assessed in the Preliminary Environmental Information Report (PEIR) through an iterative design process undertaken in response to consultation and in accordance with the mitigation hierarchy to avoid, reduce and mitigate adverse effects. As part of this design evolution, panels along the edge of the Cotswolds National Landscape and along the Fosse Way have been removed. Mitigation measures to address landscape and visual effects are set out in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**, Figure 3-4-1 to 3-4-5.2 **Landscape and Ecology Mitigation Plan [APP-084]** and detailed within the **Outline Landscape and Ecological Mitigation Plan (LEMP) [APP-283]** and the **Outline Ecological Protection and Mitigation Strategy (EPMS) [APP-284]**. These documents include proposals for new and enhanced planting, retention of existing hedgerows and woodland, and landscape integration measures to reduce visual effects over time. In addition, the Scheme design incorporates minimum offsets from existing landscape features, including residential properties, ancient woodland, woodland, hedgerows, public rights of way and watercourses, to further limit visual impacts. The preparation, approval and implementation of detailed

Reference	Theme	Comments/Issues Raised	Applicant's Response
			landscape and ecological management plans, substantially in accordance with the **OLEMP [APP-283]** and **EPMS [APP-284]**, are secured through requirements in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that the identified mitigation measures are delivered and maintained throughout the lifetime of the Scheme. <u>Ecology and Biodiversity</u> Potential impacts on ecology and biodiversity are fully assessed in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**. This assessment considers baseline ecological conditions and evaluates likely significant effects arising during the construction, operation and decommissioning phases of the Scheme. It identifies avoidance, mitigation and enhancement measures to address potential impacts on habitats and protected and notable species. It also identifies opportunities for ecological enhancement, including the creation and long-term management of habitats, and delivery of biodiversity net gain. The assessment concludes that, with the identified embedded and additional mitigation measures in place, no unacceptable significant adverse effects on ecology and biodiversity are anticipated. The Applicant notes that the approach to the assessment in relation to ecology and biodiversity in general is under discussion with Wiltshire Council and Natural England and is set out in the relevant **Statements of Common Ground**to be submitted at Deadline 1. During construction, specific measures are proposed to avoid disturbance and displacement of wildlife. These include protective buffers around sensitive habitats and features, timing restrictions on vegetation clearance, pre-construction ecological surveys, species-specific mitigation, and pollution prevention controls which are set out in the **Outline Ecological Protection and Mitigation Strategy (EPMS) [APP-284]**. Measures to protect trees and hedgerows are also set out in **ES Volume 1, Chapter 10 Arboriculture [APP-062]**.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			The Scheme will also result in the cessation of intensive arable farming within the Solar PV Sites. As identified in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**, this is expected to reduce the ongoing application of herbicides and pesticides, supporting improvements in habitat quality over the operational lifetime of the Scheme. The reversion of existing arable land within the Solar PV Sites to predominantly grassland habitats can be expected to benefit a wide range protected and notable species, as identified in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**. Mitigation and enhancement measures are detailed in the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]** and the **Outline Ecological Protection and Mitigation Strategy (OEPMS) [APP-284]**, which set out habitat creation, species protection measures, buffer zones and long-term ecological management. The preparation, approval and implementation of the detailed Landscape and Ecological Management Plan, substantially in accordance with the **OLEMP [APP-283]**, are secured through Requirement 7 in Schedule 2 of the **Draft Development Consent Order [APP-016]**. The preparation, approval and implementation of the detailed Ecological Protection and Mitigation Strategy, substantially in accordance with the **OEPMS [APP-284]**, are secured through Requirement 8 in Schedule 2 of the **Draft Development Consent Order [APP-016]**. These requirements ensure that ecological protection and enhancement measures are delivered and maintained throughout construction and operation of the Scheme. <u>Community Welfare</u> Impacts on physical health and wellbeing are assessed in **ES Volume 1, Chapter 18: Human Health [APP-070].** This chapter provides a comprehensive assessment of the Scheme's potential effects on human health, including physical health and wellbeing,

Reference	Theme	Comments/Issues Raised	Applicant's Response
			through consideration of a broad range of health determinants with physical health pathways. These include access to housing, access to open space and recreation, transport and connectivity, climate change, air quality, water quality, land quality, noise and vibration, and access to health and social care services. The assessment in **ES Volume 1, Chapter 18: Human Health [APP-070]** applies a health-based review of relevant technical chapters to identify potential pathways by which the Scheme could affect physical health. It concludes that, with the embedded mitigation and additional measures secured through the relevant management plans **[APP-277** to **APP-287]** secured by their respective requirements in Schedule 2 to the **Draft DCO [APP-016]**, the Scheme would not give rise to significant adverse effects on population physical health at any phase of the Scheme. Mitigation measures include (but are not limited to) ensuring PROWs remain open as much as is practicable, inbound workers are accommodated in the most suitable locations for housing and health service access, community liaison and engagement is maintained, and construction impacts on waterways, soils, noise and air quality are regulated. Priority has been given in the assessment to communities most likely to experience potential health-related effects, within the 2 km Study Area surrounding the Scheme. The Applicant notes that the assessment methodology for health and wellbeing has been agreed with Wiltshire Council's Public Health team and is set out in the relevant Statement of Common Ground to be submitted at Deadline 1.

6.74 Peter Cole

Table 6-74 RR-3731

Reference	Theme	Comments/Issues Raised	Applicant's Response
PCE-001	Description and DCO Process	It's an abomination.	The Applicant notes this comment.

6.75 Mark Robert Michel

Table 6-75 RR-3012

Reference	Theme	Comments/Issues Raised	Applicant's Response
MRM-001	Landscape and Visual	Concerned by the vast scale ruining an area of national beauty. Concerned by the fact it surrounds my house on 3 sides ruining all of the views. Concerned that it comes right up to the boundary of my property. Concerned for the vast numbers of wildlife that will be adversely impacted. Concerned that the planners have not understood the areas they have planned the development in, for example, my house has been marked as an ancient woodland on their maps through all of the stages of communication despite my correcting them.	Grain Store Barn is identified as receptor RG020 and has been fully assessed in **ES Volume 3, Appendix 8-3-2-2: Landscape and Visual Assessment Sheets (Significant) [APP-191]**. The assessment recognises that there would be Major/Moderate Adverse effects which are Significant during Construction and Year 1. The assessment notes: The scheme has been designed to accommodate these residential properties, and infrastructure has been set back to allow separation and space for mitigation. Views of construction activity would be visible in open views across the surrounding fields, where visible, this would be set back from the properties by at least 150m. There is no proposed infrastructure within field C16 and open views are maintained to the south. The level of change in views would be High. Proposed mitigation includes reinforced roadside screening, new sections of hedgerow, hedgerow reinforcement and enhancement is proposed throughout the surrounding Site. Although this would have a limited effect initially, by Year 15 mitigation planting would filter views of the proposed infrastructure and reduce visibility of the Scheme reducing the effect to Moderate/ Minor adverse which is non-significant.

6.76 John Eavis

Table 6-76 RR-2358

Reference	Theme	Comments/Issues Raised	Applicant's Response
JE-001	Transport and Access	The impact on my farm is colossal There is no proper process for vehicle movement through to Rodbourne The Roads are not big enough	The construction route is not proposed to route through Rodbourne. Access to Lime Down E will be provided via the A429.
JE-002	Climate Change and Energy Need	Carbon and climate considerations: While the scheme could deliver net carbon savings over its lifetime, construction emissions mean carbon break-even would not occur until 2076.	It is not clear how the 2076 year of offset conclusion has been reached. **ES Volume 1, Chapter 7: Climate Change [APP-059]** assesses greenhouse gas (GHG) emissions across the full life cycle of the Scheme, including the manufacture, transport, installation, operation, maintenance and decommissioning of Scheme components. This assessment includes embodied carbon associated with materials and components, as well as operational emissions savings arising from renewable electricity generation. The assessment concludes that, while emissions are associated with the manufacture and construction of the Scheme, these are outweighed over time by the carbon savings achieved through the displacement of fossil fuel-derived electricity generation. When considered over its operational lifetime, the Scheme would result in a net reduction in GHG emissions compared to a 'without Scheme' scenario and would make a meaningful contribution to the UK's legally binding carbon budgets and transition to net zero. As the scheme will require replacement of components, and will generate some minimal emissions during operation, it is not considered that a 'break-even' date is a useful measure of the scheme's beneficial effect. i.e. the scheme's beneficial effect will not in itself directly result in negative emissions but it will in comparison to a scenario where the scheme is not developed. However, as the GHG electricity generation intensity figure for the Scheme is anticipated to sit continually below the forecast grid average for 2029, GHG emissions savings are expected to be achieved throughout the lifetime of the Scheme compared to a generation scenario in the absence of the Scheme. Therefore, the GHG emissions during construction, operation, and

Reference	Theme	Comments/Issues Raised	Applicant's Response
			decommissioning of the Scheme can be considered to be 'offset' by the net positive impact of the Scheme on GHG emissions and the UK's ability to meet its carbon targets.
JE-003	Cultural Heritage	Heritage and archaeology: Potential harm to heritage assets such as Bradfield Manor and Rodbourne Conservation Area has been under-assessed and archaeological mitigation strategies remain incomplete.	**ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, supported by Volume 3, **Appendix 12.1: Heritage Statement [APP-219]**, assessed the potential impacts of the Scheme on Rodbourne Conservation Area and the Grade I Listed Bradfield Manor Farmhouse (NHLE: 1198808). With consideration to Rodbourne Conservation Area, embedded mitigation including the removal of Fields E5 and E8 from the Scheme Order Limits, removal of panels from Fields E7, E9 and E10, offsets to the PROW and enhanced screening of existing hedgerows are considered sufficient mitigation to remove any adverse impacts to the Conservation Area. Therefore no impact was identified as a result of the Scheme to the Conservation Area. As stated in **Appendix 12.1: Heritage Statement [APP-219]** when considering the contribution of setting to the significance of Bradfield Manor Farmhouse, the asset is largely defined and experienced from within the Bradfield Manor Farmhouse grounds, in particular the walled courtyard to the south-west of the asset, where the full architectural interest of its south-facing primary elevation can be appreciated. Lime Down D is located within agricultural land to the north of asset. Following advise provided by Historic England panels in Field D5 were set back away from Grade I Listed Bradfield Manor Farm house and enhanced screening is proposed along existing hedgerows. Views of the proposed BESS and 400 kV Substation from Bradfield Manor Farmhouse will be largely mitigated by the proposed new woodland belt along the south-eastern boundary of Field D3 which, in combination with the existing woodland block west of D1 and south of D22, provides extensive screening in views to and from Bradfield Manor Farmhouse. It was identified that there would be a moderate / minor (not significant) adverse effect to the asset (less than substantial harm at the lower end in NPPF terms) as a result of indirect (i.e. setting) impacts.
JE-004	Transport and Access	Highways and transport: Concerns include inadequate mitigation for HGV	The capacity of local roads and infrastructure to accommodate construction vehicles is assessed in **ES Volume 1, Chapter 13:**

Reference	Theme	Comments/Issues Raised	Applicant's Response
		movements on narrow rural roads and insufficient commitments for passing places. There is insufficient control over the works on the public highway.	**Transport and Access [APP-065]**, which considers construction traffic volumes, vehicle types, route suitability and network performance. The assessment concludes that, with appropriate mitigation in place, there would be no significant adverse impacts on the local highway network. Supporting technical information is provided in **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]**, which identifies specific locations where traffic management measures or passing arrangements may be required on narrower sections of construction routes. The assessment presented in Annex H of **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]** demonstrates adequate carriageway width or frequency of passing place opportunity to pass at least an HGV and a light vehicle as requested in comments provided by Wiltshire Council. All construction routes also include passing points to allow two HGVs to pass. Mitigation measures to manage construction traffic are set out in the **Outline Construction Traffic Management Plan (CTMP) [APP-287]**. The CTMP is designed to minimise the effects of construction traffic on local roads and includes measures for vehicle routing, delivery scheduling and liaison with the local highway authority. The preparation, approval and implementation of the final CTMP, substantially in accordance with the outline CTMP, are secured through Requirement 15 of Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring construction traffic impacts on local roads and infrastructure are appropriately managed throughout the construction phase of the Scheme.
JE-005	Socio-Economics, Tourism and Recreation	Economic and community impact: The scheme risks the loss of agricultural and tourism jobs, removal of 878 hectares of land from food production,	The Applicant confirms that land agreements are being made with landowners who have their own contractual arrangements with tenant farmers. This may therefore involve the termination of agricultural tenancies at the discretion of the landowner.

Reference	Theme	Comments/Issues Raised	Applicant's Response
	Soils and Agriculture	as well as adverse effects on local businesses and communities.	The Applicant is however cognisant of the impact this may have and so seeks to source ways of retaining agricultural workers, providing reskilling opportunities, or providing re-employment as supported by the measures secured in the **Outline Skills, Supply Chain and Employment Plan [APP-285]**. The potential effects of the Scheme on tourism and recreation are assessed in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]**, supported by **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]**. The assessment considers baseline tourism activity, visitor attractions, recreational assets and tourism-dependent businesses within the study area. The assessment evaluates potential effects on the use, enjoyment and desirability of nearby tourism destinations, including impacts on individual visitor attractions, recreational routes, events and businesses reliant on tourism. It also considers whether changes to landscape character or visual amenity could influence visitor behaviour. The assessment identifies a worst-case scenario in which a temporary loss of up to 50 tourism-related jobs could occur locally during construction, and a long-term loss of up to 11 tourism-related jobs could occur during the operational phase of the Scheme. This represents a precautionary estimate based on conservative assumptions. The assessment concludes that, while some localised effects on tourism receptors are anticipated to occur, significant adverse effects on the wider tourism economy are not anticipated. These findings are fully reported in the ES and will be weighed in the planning balance alongside the Scheme's wider economic and environmental benefits. The Applicant notes that the approach to assessment of tourism impacts is under discussion with Wiltshire Council's Economic and Regeneration Team and is set out in the Statement of

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Common Ground with Wiltshire Councilto be submitted at Deadline 1. The potential effects of the Scheme on agricultural land are assessed in **ES Volume 1, Chapter 17 Soils and Agriculture [APP-069]**, which considers baseline agricultural land use and quality and evaluates likely effects during construction, operation and decommissioning. The assessment confirms that the Scheme will result in a temporary and reversible loss of agricultural land during the operational period, with all land to be returned to its original use and condition as far as practicable following decommissioning. No permanent loss of agricultural land is anticipated. The Applicant does not consider that food security will be compromised by the Scheme (or solar energy more widely). The latest figures to September 2024 indicate that solar occupied around 21,200 ha of agricultural land in the UK. In 2025, 545,000 ha of arable land in England were left uncropped (source: Department for Environment, Food & Rural Affairs, Agricultural land use in England at 1 June 2025). It should also be noted that food security is not identified as an issue within the suite of Energy National Policy Statements or the National Planning Policy Framework (NPPF). Further, the Government's UK Solar Roadmap (2025) states that solar development is not considered to compromise food security, but that the climate and nature crisis poses the greatest long-term risk to food security- a risk which the Scheme directly helps to address by providing a secure, low-carbon source of electricity. As set out in Section 2 of the **Outline Decommissioning Strategy [APP-279],** post-decommissioning of the Scheme, the landowners would choose how the land is to be used and managed. The landowner may return all of the land to arable use, although it is likely that established habitats such as hedgerows and woodland would be retained given their potential benefits to

Reference	Theme	Comments/Issues Raised	Applicant's Response
			agricultural land and the wider farming estate. An assessment of the likely effects of the Scheme on the local economy and employment is provided in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]**. This chapter considers potential impacts on construction and engineering sectors, agricultural activity, tourism-related businesses, and wider local economic conditions during construction, operation and decommissioning. Supporting evidence is provided in **ES Volume 3, Appendix 16-3: Socio-Economics, Tourism and Recreation – Summary of Non-Significant Effects [APP-242]**, which summarises that effects on the local economy and economic prosperity are assessed as negligible to minor beneficial, with construction expenditure and employment generation contributing positive, temporary effects on local economic activity. The assessment therefore concludes that the Scheme would not result in significant adverse effects on local businesses or the wider local economy, and that socio-economic benefits, including job creation and local supply-chain opportunities, are expected during the construction phase, with more modest economic and skills and supply chain opportunities during the operational phase. The Applicant notes that the approach to assessment of socio-economic effects has been agreed with Wiltshire Council's Economic and Regeneration Team, with the exception of matters relating to agricultural employment, which is still under discussion. This is set out in the Statement of Common Ground with Wiltshire Councilto be submitted at Deadline 1.
JE-006	Landscape and Visual	We also concur with the following information Landscape and visual impact: The project would cause substantial, long-term harm to landscape character over 749 hectares in a sensitive location	The Cotswolds National Landscape (CNL) is fully assessed as a standalone receptor within **ES Volume 3, Appendix 8.6: Assessment of Effects on the Special Qualities of the Cotswolds National Landscape [APP-197]**. This assessment considers the effects of the Scheme on landscape character,

Reference	Theme	Comments/Issues Raised	Applicant's Response
		near the Cotswolds National Landscape. We consider compliance with Core Policy 51 ("*protect and enhance landscape character*") is impossible at this scale.	visual amenity and the special qualities of the CNL, including tranquillity. The assessment found that there would be some short term impact to landscape character within the setting of the CNL but due to the avoidance measures embedded within the Scheme, harm to the CNL itself would be minimal with beneficial effects in the long term which would further the purposes of the designation. In respect of visual amenity, some short-term adverse effects would be experienced by a small number of visual receptors with views to and from the CNL. However, these would reduce over time as a result of the proposed mitigation. The assessment of effects on the special qualities of the CNL scoped out 3 SQs as there is no association with the Site. The assessment found that there are no direct effects on the remaining SQs. There are some Minor/ Negligible short-term effects on a small number of visual receptors within the setting of the CNL which effect SQ7 -Tranquillity and SQ13 Archaeology and historic associations. However, these effects are mitigated by Year 15 when proposed vegetation has matured. The assessment also found that there would be beneficial effects on SQ 6 – Biodiversity and nature recovery as a result of the delivery of approximately 119.7 hectares of flower-rich neutral grassland (as defined in the BNG assessment) and SQ 12 - An accessible landscape as a result of the delivery of approximately 12.8km of new permissive paths within the setting of the CNL. The remaining SQs would remain entirely intact. The Scheme was refined through an iterative design process to avoid and reduce effects on the CNL and its setting. Panels along the edge of the CNL were removed from the Order Limits in fields C2, C3 and C4 where significant visual effects on receptors within the CNL were identified. Panels were also removed from fields C1, C6, C8, the western section of C9 and the majority of C10, with this land now proposed for ecological mitigation to protect the setting of the CNL. In addition, panels within fields A11 and A12 were removed and the land repurposed for ecological mitigation to protect the setting of the CNL towards

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Sherston. All land parcels adjacent to the CNL are proposed to deliver habitat enhancement, informed by the CNL Management Plan and the Cotswolds National Landscape Strategy and Guidelines, to further the purposes of the designation. Details of the proposed landscape and ecological mitigation and enhancement measures are provided in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**, Figure 3-4-1 to 3-4-5.2 **Landscape and Ecology Mitigation Plan [APP-084]** and the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]**, and the **Outline Ecological Protection and Mitigation Strategy (EPMS) [APP-284]**. The preparation, approval and implementation of the detailed Landscape and Ecological Management Plan, substantially in accordance with the **OLEMP [APP-283]**, are secured through Requirement 7 in Schedule 2 of the **Draft Development Consent Order [APP-016]**. The preparation, approval and implementation of the detailed Ecological Protection and Mitigation Strategy, substantially in accordance with the **EPMS [APP-284]**, are secured through Requirement 8 in Schedule 2 of the **Draft Development Consent Order [APP-016]**. These requirements ensure that the identified mitigation and enhancement measures are delivered and maintained throughout the lifetime of the Scheme. With reference to Core Policy 51, the Applicant considers that although there are some short-term significant effects to the character of the landscape due to the change in land use caused by the infrastructure, there would also be permanent beneficial effects to the fabric of the Site as a result of the embedded mitigation measures which would contribute positively to the legacy landscape and be in line with Core Policy 51 and Wiltshire's Nature Recovery Strategy.

Reference	Theme	Comments/Issues Raised	Applicant's Response
JE-007	Ecology and Biodiversity	Ecology and biodiversity: Surveys for key species and habitats are incomplete, particularly along the cable route corridor. It is vital to take is a precautionary approach and enforceable commitments for biodiversity net gain and habitat protection.	The Applicant notes this comment. The scope of ecological and species-specific survey were defined using a proportionate, risk-based approach. Survey scope and effort across the Order Limits were targeted to areas and species where there was a reasonable likelihood of significant effects, rather than applied uniformly across the Order Limits irrespective of risk. The baseline information is considered sufficient to support a robust and proportionate assessment of likely significant effects of the Scheme, and the conclusions of **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]** are appropriate and justified.

6.77 Christopher Smith

Table 6-77 RR-0842

Reference	Theme	Comments/Issues Raised	Applicant's Response
CSH-001	Climate Change and Energy Need Ecology and Biodiversity	I object strongly to the entire Lime Down project. It is not green and is in reality an industrial development which will have a huge negative impact on the local and surrounding area. I object to the installation of the BESS due to the risks and impact on local people, the school, wildlife, flora and fauna. I object to the traffic increase and road disruption that will result from this project. I object to the negative impact on local wildlife, walks, views, noise, loss of amenity and historical sites due to this industrialisation.	**ES Volume 1, Chapter 7: Climate Change [APP-059]** assesses greenhouse gas (GHG) emissions across the full life cycle of the Scheme, including the manufacture, transport, installation, operation, maintenance and decommissioning of Scheme components. This assessment includes embodied carbon associated with materials and components, as well as operational emissions savings arising from renewable electricity generation. The assessment concludes that, while emissions are associated with the manufacture and construction of the Scheme, these are outweighed over time by the carbon savings achieved through the displacement of fossil fuel-derived electricity generation. When considered over its operational lifetime, the Scheme would result in a net reduction in GHG emissions compared to a 'without Scheme' scenario and would make a meaningful contribution to the UK's legally binding carbon budgets and transition to net zero. The Scheme has been designed to deliver the greatest possible benefit from the available land and the available grid connection, whilst avoiding, minimising and/or mitigating harmful environmental effects. As per the description set out in **ES Volume 1, Chapter 3: The Scheme [APP-055]** the total area within the DCO Order Limits encompasses approximately 1,237 hectares (ha). Of this, the 'Solar PV Sites' comprise approximately 749.1 ha of land. Around 479.5 ha of this land is proposed as being required for installation of solar PV, battery storage, and associated infrastructure. The remaining 269.5 ha would provide areas dedicated to ecological mitigation, measurable Biodiversity Net Gain (BNG) delivery, landscaping, offsets and agricultural land managed for environmental enhancement and habitat creation. The Applicant remains committed to delivering a Scheme that makes a meaningful contribution to the UK's transition to net zero, while also seeking to minimise adverse impacts and maximise opportunities for environmental enhancement and

Reference	Theme	Comments/Issues Raised	Applicant's Response
			community benefits. BESS Safety The Battery Energy Storage System (BESS) containers proposed for the Scheme will incorporate built-in safety features for fire avoidance, detection and suppression. The Scheme layout also incorporates separation distances between battery containers to ensure that any isolated fire would not become widespread or lead to a major incident. As shown on **ES Volume 2, Figure 3-1: Indicative Site Layout Plan [APP-081]**, the battery containers will be located more than 200 metres from the nearest Public Right of Way and more than 500 metres from any residential receptors. The Applicant notes that the approach to BESS safety is under discussion with Dorset and Wiltshire Fire and Rescue Service (D&WFRS) and is set out in the relevant **Statement of Common Ground** to be submitted at Deadline 1. An **Outline Battery Safety Management Plan (OBSMP) [APP-286]** has been prepared for the Scheme using guidance from Dorset and Wiltshire Fire and Rescue Service and incorporating recommendations of the National Fire Chiefs Council. The OBSMP ensures that risks associated with battery storage are appropriately mitigated. Section 6.1.1 of the OBSMP confirms that at the detailed design stage, the selected BESS will have undertaken Large Scale Fire Testing (LSFT) to fully inform inputs for risk assessment tools which will be utilised together with detailed consequence modelling to provide a comprehensive site operations and emergency response safety audit. LSFT is a mandatory requirement under NFPA 855 (2026) safety standards to demonstrate thermal insulation protection capabilities of the BESS enclosure design, validate minimum equipment spacing distances, and demonstrate that deflagrations do not occur and/or can be safely constrained.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			As set out in **Outline Battery Safety Management Plan (OBSMP) [APP-286]**, the BESS Area will have a robust and validated Emergency Response Plan (ERP), developed in consultation with Dorset & Wiltshire Fire and Rescue Service at the detailed design stage. Section 5.4 of the OBSMP specifies the typical emergency response protocols, procedures and safety information that will be included in the ERP. The ERP will apply to all stages of the Scheme, including construction, operation and decommissioning. Potential effects of toxic gases arising from a BESS fire are assessed in **ES Volume 1, Chapter 15: Air Quality [APP-067]** and in **ES Volume 1, Chapter 20: Other Environmental Matters [APP-072]**, Section 20.7: Major Accidents and Disasters. An assessment of how these fumes could affect sensitive receptors within a 1 km radius of the BESS Area, including residential properties and ecological receptors, is provided in **ES Volume 1, Chapter 15: Air Quality [APP-067]**. This assessment concludes that no significant off-site impacts are predicted should a fire event occur. In the unlikely event of a fire, the precautionary measures set out in the **Outline Battery Safety Management Plan (OBSMP) [APP-286]** — including advice to remain indoors and close windows — would further reduce potential impacts to residents. The **OBSMP [APP-286]** is secured through Requirement 6 (Battery safety management) in Schedule 2 of the **Draft DCO [APP-016]**, which provides that Work No. 2 must not commence until a Battery Safety Management Plan has been submitted to and approved by the relevant planning authority. The approved plan must be substantially in accordance with the Outline Battery Safety Management Plan. The Draft DCO also requires the relevant planning authority to consult with Dorset and Wiltshire Fire and Rescue Service and the Environment Agency before determining the application, and that the Battery Safety Management Plan must be implemented as approved.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Wildlife, flora and fauna Potential impacts on ecology and biodiversity are fully assessed in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**. This assessment considers baseline ecological conditions and evaluates likely significant effects arising during the construction, operation and decommissioning phases of the Scheme. It identifies avoidance, mitigation and enhancement measures to address potential impacts on habitats and protected and notable species. It also identifies opportunities for ecological enhancement, including the creation and long-term management of habitats, and delivery of biodiversity net gain. The assessment concludes that, with the identified embedded and additional mitigation measures in place, no unacceptable significant adverse effects on ecology and biodiversity are anticipated. The Applicant notes that the approach to the assessment in relation to ecology and biodiversity in general is under discussion with Wiltshire Council and Natural England and is set out in the relevant **Statements of Common Ground**to be submitted at Deadline 1. During construction, specific measures are proposed to avoid disturbance and displacement of wildlife. These include protective buffers around sensitive habitats and features, timing restrictions on vegetation clearance, pre-construction ecological surveys, species-specific mitigation, and pollution prevention controls which are set out in the **Outline Ecological Protection and Mitigation Strategy (EPMS) [APP-284]**. Measures to protect trees and hedgerows are also set out in **ES Volume 1, Chapter 10 Arboriculture [APP-062]**. The Scheme will also result in the cessation of intensive arable farming within the Solar PV Sites. As identified in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**, this is expected to reduce the ongoing application of herbicides and pesticides, supporting improvements in habitat quality over the operational lifetime of the Scheme. The reversion of existing

Reference	Theme	Comments/Issues Raised	Applicant's Response
			arable land within the Solar PV Sites to predominantly grassland habitats can be expected to benefit a wide range protected and notable species, as identified in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**. Mitigation and enhancement measures are detailed in the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]** and the **Outline Ecological Protection and Mitigation Strategy (OEPMS) [APP-284]**, which set out habitat creation, species protection measures, buffer zones and long-term ecological management. The preparation, approval and implementation of the detailed Landscape and Ecological Management Plan, substantially in accordance with the **OLEMP [APP-283]**, are secured through Requirement 7 in Schedule 2 of the **Draft Development Consent Order [APP-016]**. The preparation, approval and implementation of the detailed Ecological Protection and Mitigation Strategy, substantially in accordance with the O**EPMS [APP-284]**, are secured through Requirement 8 in Schedule 2 of the **Draft Development Consent Order [APP-016]**. These requirements ensure that ecological protection and enhancement measures are delivered and maintained throughout construction and operation of the Scheme. <u>Traffic</u> The effects of construction traffic on the local highway network are assessed in **ES Volume 1, Chapter 13: Transport and Access [APP-065]**, which considers construction vehicle routing, traffic volumes and potential impacts on highway safety and road condition. The assessment concludes that, with appropriate management measures in place, construction traffic effects can be appropriately controlled. Mitigation measures to manage construction traffic and protect local roads are set out in the **Outline Construction Traffic Management Plan (CTMP) [APP-287]**. The CTMP has been

Reference	Theme	Comments/Issues Raised	Applicant's Response
			developed to minimise impacts on the local highway network and includes measures for routing, scheduling of deliveries and liaison with the local highway authority. A road condition and dilapidation survey of minor roads not typically used by HGV traffic is included as a measure within the CTMP. Any damage to verges or carriageway surfaces caused by construction vehicles will be rectified to the satisfaction of the local highway authority. The preparation, approval and implementation of the final CTMP, substantially in accordance with the outline CTMP, are secured through Requirement 15 of Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring construction traffic impacts, including potential damage to local roads, are appropriately managed throughout the construction phase of the Scheme. <u>Walks and amenity</u> A detailed assessment of the likely significance of effects from the Scheme on the use and desirability of individual PRoW, and recreational access to the countryside, has been included in the **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** and **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]**. This assessment considers the impact on individual recreational routes – be that practically in their use, and their enjoyment and desirability. The Applicant confirms that the majority of significant adverse effects can be mitigated, however understands that some significant adverse effects to users of PROWs and unsurfaced roads in Lime Down E cannot be mitigated further during construction. No significant residual effects are anticipated during the operational phase of the Scheme. The Applicant notes that the assessment of PROW impacts and mitigation is under discussion with Wiltshire Council's Countryside Access Team and is set out in the Statement of

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Common Ground with Wiltshire Councilto be submitted at Deadline 1. The Applicant confirms that existing PRoW are to be controlled within the Scheme design with PRoW management strategies set out in the **Outline Public Rights of Way and Permissive Paths Management Plan (PROWPPMP) [APP-282]**. These are confirmed as embedded mitigation measures in Section 16.9 of ES Chapter 16. New permissive access routes have been included in the Scheme design, shown as Work No.10 on the **Works Plan [APP-007]** and shown on **ES Volume 2, Figure 3-4: Landscape and Ecology Mitigation Plan [APP-283]**. These are considered as additional mitigation and enhancement measures in Section 16.11 of ES Chapter 16. The PRoW and Permissive Paths MP is secured through Requirement 16 of Schedule 2 of the **Draft DCO [APP-016]**. The preparation, approval and implementation of the detailed CEMP and CTMP, substantially in accordance with the outline plans, are secured through Requirements 13 and 15 respectively in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that impacts on PRoW and recreational routes are appropriately managed during construction. <u>Noise</u> An assessment of the effects of the Scheme on noise and vibration is provided in **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**, with supporting technical information supplied in **ES Volume 3, Appendix 14-4: Noise Modelling [APP-237]**. The assessment considers potential noise and vibration impacts during construction, operation and decommissioning, including from solar PV panels and associated infrastructure.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			The Applicant notes that the approach to noise and vibration has been discussed with Wiltshire Council, as described in Section 14.2 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**. Construction phase The noise and vibration impacts arising from construction activities are assessed in Section 14.10 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**. For the purposes of the assessment, a reasonable worst-case scenario assuming piling activities has been considered. Mitigation measures associated with construction activity are presented in Section 14.9 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]** and are committed to through the **Outline Construction Environmental Management Plan [APP-277]**. A noise monitoring programme agreed with Wiltshire Council will be carried out during construction. The preparation, approval and implementation of the Construction Environmental Management Plan, substantially in accordance with the **Outline CEMP [APP-277]**, is secured through Requirement 13 in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that construction noise and vibration are appropriately controlled. With these measures in place, the assessment concludes that no significant effects from construction noise or vibration are expected. Operational phase The noise impacts from the operation of the Scheme and its components are assessed in Section 14.10 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**, with supporting modelling provided in **ES Volume 3, Appendix 14-4: Noise Modelling [APP-237]**. A penalty has been applied to predicted noise levels from the Solar PV Sites to account for the distinctive

Reference	Theme	Comments/Issues Raised	Applicant's Response
			nature of the sound. Potential mitigation measures are detailed in Section 14.9 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**, and with such measures in place, significant effects from operational noise are not expected. The **Outline Operational Environmental Management Plan [APP-278]** commits to noise levels from the Scheme at residential dwellings being the same as or below those modelled in the ES. This provides assurance that significant effects from operational noise will be avoided, while allowing flexibility in how this is achieved. The preparation, approval and implementation of the detailed OEMP, substantially in accordance with the outline plan, are secured through Requirement 14 of Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring operational noise is appropriately controlled throughout the lifetime of the Scheme. <u>Historical sites</u> The potential effects of the Scheme on cultural heritage, including archaeological assets dated to the Roman and medieval periods, are fully assessed in **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, supported by detailed technical appendices in **ES Volume 3, Appendices 12-1 to 12-7 [APP-219 to APP-231]**. The chapter considers baseline conditions, identifies built and archaeological heritage assets within the study area, and assesses likely effects during construction, operation and decommissioning, including effects on setting. The chapter concluded that, following mitigation, the residual effects on any archaeological assets including Roman and medieval period remains, would be neutral/negligible and therefore not significant (see **Volume 3, Appendix 12-8 Cultural Heritage Impact Assessment Tables [APP-232]**). The assessment is underpinned by extensive desk-based research, geophysical survey and evaluation trenching, as detailed in **ES Volume 3, Appendix 12-2: Archaeological**

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Desk-Based Assessments [APP-220], Appendix 12-4: Archaeological Geophysical Survey Reports [APP-224], and Appendix 12-5: Interim Evaluation Trial Trenching Reports [APP-225]. The Applicant notes that the approach to the assessment has been agreed with Wiltshire Council and the methodology for the mitigation strategy is under discussion with Wiltshire Council and is set out in the relevant **Statement of Common Ground**to be submitted at Deadline 1. Embedded mitigation measures to avoid or reduce harm to heritage assets are set out in Section 12.9 of **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, with additional mitigation measures detailed in Section 12.11. An overarching archaeological mitigation strategy is provided in **ES Volume 3, Appendix 12-6: Outline Archaeological Mitigation Strategy [APP-230]**, which sets out the framework for further archaeological investigation, recording and protection where ground disturbance cannot be avoided. The preparation, approval and implementation of detailed archaeological Written Schemes of Investigation, substantially in accordance with the Outline Archaeological Mitigation Strategy, are secured through Requirement 12 of Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that appropriate protection, recording and mitigation are delivered before and during construction.

6.78 Bridget Marie Gregory

Table 6-78 RR-0542

Reference	Theme	Comments/Issues Raised	Applicant's Response
BMG-001	Construction and Decommissioning Noise and Vibration Socio-Economics, Tourism and Recreation	I oppose this project for the following reasons: 1)The cable route will pass directly through several fields of our farm including one only metres from the farm buildings and slurry lagoon which is due to be built this Spring; the associated cable laying construction work and noise will therefore considerably disrupt our business regarding crops and livestock grazing.	The anticipated effects to the farming business affected by cable routing are likely to be temporary, and restricted to the width of the Cable Route Corridor. Where fields have been bisected, working practices around cable laying works should allow for access to be maintained to both sides of the Cable Route Corridor to allow for agricultural work to be continued even during construction. The **OCEMP [APP-277]** furthermore commits to the reinstatement of land affected by cabling works as soon as practicable to allow for agricultural work on the land to recommence as soon as construction of that section of cable route is complete. Loss of agricultural revenue as a result of temporary works to construct the Cable Route Corridor can be compensated either through voluntary agreement with the Applicant, or through the application of compulsory acquisition powers.
BMG-002	Ecology and Biodiversity	2) During the ecological and geophysical surveys of our land the contractors advised us that they had only been instructed to survey the one, now proposed, route, even though at that time the developers were stating that three routes were being considered. I question whether alternative cable routes were genuinely considered.	Details regarding the alternative cable routes considered are set out in Section 4.6 of **ES Volume 1, Chapter 4 Alternatives and Design Evolution [APP-056]** where it explains the design evolution of the Cable Route Corridor and the alternatives that have been considered from non-statutory consultation up to DCO Application submission. In summary, four routes were initially considered, as shown on **ES Volume 2, Figure 4-5: Indicative Cable Route Corridors [APP-089]** which were assessed against a range of criteria such as the length of the route, the number of rail and road crossings etc. The cable route corridor has also been also informed through technical discussions and by feedback from statutory consultation. In refining the cable route corridor to a final alignment for the DCO application, a range of constraints was considered, including landscape and visual, ecology and biodiversity, arboriculture, cultural heritage, transport and access, air quality, soils and agriculture etc in order to minimise potential impacts.
BMG-003	Landscape and Visual	3) The proposed siting of the panels and battery storage areas would cover a large area of the Cotswolds Area of Outstanding Natural Beauty, which needs to be protected and preserved for future generations to enjoy. By	The Applicant confirms that no solar PV panels, Battery Energy Storage System infrastructure or associated built development are proposed within the Cotswolds National Landscape (formerly the Cotswolds Area of Outstanding Natural Beauty). The Cotswolds National Landscape (CNL) is fully assessed as

Reference	Theme	Comments/Issues Raised	Applicant's Response
		definition important flora and fauna inhabit the area and the solar farm development would destroy unique habitats and important ecosystems. There is no evidence to prove that the land covered by the project, because it is already an AONB, would be left in an improved state after the 60 years of its life.	a standalone receptor within **ES Volume 3, Appendix 8.6: Assessment of Effects on the Special Qualities of the Cotswolds National Landscape [APP-197]**. This assessment considers the effects of the Scheme on landscape character, visual amenity and the special qualities of the CNL, including tranquillity. The assessment found that there would be some short term impact to landscape character within the setting of the CNL but due to the avoidance measures embedded within the Scheme, harm to the CNL itself would be minimal with beneficial effects in the long term which would further the purposes of the designation. In respect of visual amenity, some short-term adverse effects would be experienced by a small number of visual receptors with views to and from the CNL. However, these would reduce over time as a result of the proposed mitigation. The assessment of effects on the special qualities of the CNL scoped out 3 SQs as there is no association with the Site. The assessment found that there are no direct effects on the remaining SQs. There are some Minor/ Negligible short-term effects on a small number of visual receptors within the setting of the CNL which effect SQ7 -Tranquillity and SQ13 Archaeology and historic associations. However, these effects are mitigated by Year 15 when proposed vegetation has matured. The assessment also found that there would be beneficial effects on SQ 6 – Biodiversity and nature recovery as a result of the delivery of approximately 119.7 hectares of flower-rich neutral grassland (as defined in the BNG assessment) and SQ 12 - An accessible landscape as a result of the delivery of approximately 12.8km of new permissive paths within the setting of the CNL. The remaining SQs would remain entirely intact. The Scheme was refined through an iterative design process to avoid and reduce effects on the CNL and its setting. Panels along the edge of the CNL were removed from the Order Limits in fields C2, C3 and C4 where significant visual effects on receptors within the CNL were identified. Panels were also removed from fields C1, C6, C8, the western section of C9 and

Reference	Theme	Comments/Issues Raised	Applicant's Response
			the majority of C10, with this land now proposed for ecological mitigation to protect the setting of the CNL. In addition, panels within fields A11 and A12 were removed and the land repurposed for ecological mitigation to protect the setting of the CNL towards Sherston. All land parcels adjacent to the CNL are proposed to deliver habitat enhancement, informed by the CNL Management Plan and the Cotswolds National Landscape Strategy and Guidelines, to further the purposes of the designation. Details of the proposed landscape and ecological mitigation and enhancement measures are provided in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**, Figure 3-4-1 to 3-4-5.2 **Landscape and Ecology Mitigation Plan [APP-084]** and the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]**, and the **Outline Ecological Protection and Mitigation Strategy (EPMS) [APP-284]**. The preparation, approval and implementation of the detailed Landscape and Ecological Management Plan, substantially in accordance with the **OLEMP [APP-283]**, are secured through Requirement 7 in Schedule 2 of the **Draft Development Consent Order [APP-016]**. The preparation, approval and implementation of the detailed Ecological Protection and Mitigation Strategy, substantially in accordance with the **EPMS [APP-284]**, are secured through Requirement 8 in Schedule 2 of the **Draft Development Consent Order [APP-016]**. These requirements ensure that the identified mitigation and enhancement measures are delivered and maintained throughout the lifetime of the Scheme. Potential impacts on ecology and biodiversity are fully assessed in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**. This assessment considers baseline ecological conditions and evaluates likely significant effects arising during the construction, operation and decommissioning phases of the

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Scheme. It identifies avoidance, mitigation and enhancement measures to address potential impacts on habitats and protected and notable species. It also identifies opportunities for ecological enhancement, including the creation and long-term management of habitats, and delivery of biodiversity net gain. The assessment concludes that, with the identified embedded and additional mitigation measures in place, no unacceptable significant adverse effects on ecology and biodiversity are anticipated. The Applicant notes that the approach to the assessment in relation to ecology and biodiversity in general is under discussion with Wiltshire Council and Natural England and is set out in the relevant **Statements of Common Ground**to be submitted at Deadline 1. During construction, specific measures are proposed to avoid disturbance and displacement of wildlife. These include protective buffers around sensitive habitats and features, timing restrictions on vegetation clearance, pre-construction ecological surveys, species-specific mitigation, and pollution prevention controls which are set out in the **Outline Ecological Protection and Mitigation Strategy (EPMS) [APP-284]**. Measures to protect trees and hedgerows are also set out in **ES Volume 1, Chapter 10 Arboriculture [APP-062]**. The Scheme will also result in the cessation of intensive arable farming within the Solar PV Sites. As identified in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**, this is expected to reduce the ongoing application of herbicides and pesticides, supporting improvements in habitat quality over the operational lifetime of the Scheme. The reversion of existing arable land within the Solar PV Sites to predominantly grassland habitats can be expected to benefit a wide range protected and notable species, as identified in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**. Mitigation and enhancement measures are detailed in the

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Outline Landscape and Ecological Management Plan (OLEMP) [APP-283] and the **Outline Ecological Protection and Mitigation Strategy (OEPMS) [APP-284]**, which set out habitat creation, species protection measures, buffer zones and long-term ecological management. The preparation, approval and implementation of the detailed Landscape and Ecological Management Plan, substantially in accordance with the **OLEMP [APP-283]**, are secured through Requirement 7 in Schedule 2 of the **Draft Development Consent Order [APP-016]**. The preparation, approval and implementation of the detailed Ecological Protection and Mitigation Strategy, substantially in accordance with the O**EPMS [APP-284]**, are secured through Requirement 8 in Schedule 2 of the **Draft Development Consent Order [APP-016]**. These requirements ensure that ecological protection and enhancement measures are delivered and maintained throughout construction and operation of the Scheme.
BMG-004	Transport and Access	4) The local roads which would be used by frequent, large and heavy construction traffic are not suitable for this and would become eroded and damaged with a negative impact for local residents	The capacity of local roads and infrastructure to accommodate construction vehicles is assessed in **ES Volume 1, Chapter 13: Transport and Access [APP-065]**, which considers construction traffic volumes, vehicle types, route suitability and network performance. The assessment concludes that, with appropriate mitigation in place, there would be no significant adverse impacts on the local highway network. Supporting technical information is provided in **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]**, which identifies specific locations where traffic management measures or passing arrangements may be required on narrower sections of construction routes. The assessment presented in Annex H of **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]** demonstrates adequate carriageway width or frequency of passing place opportunity to pass at least an HGV and a light vehicle as requested in comments provided by Wiltshire Council. All construction routes also include passing points to

Reference	Theme	Comments/Issues Raised	Applicant's Response
			allow two HGVs to pass. Mitigation measures to manage construction traffic are set out in the **Outline Construction Traffic Management Plan (CTMP) [APP-287]**. The CTMP is designed to minimise the effects of construction traffic on local roads and includes measures for vehicle routing, delivery scheduling and liaison with the local highway authority. A road condition and dilapidation survey of minor roads not typically used by HGV traffic is included as a measure within the CTMP. Any damage to verges or carriageway surfaces caused by construction vehicles will be rectified to the satisfaction of the local highway authority. The preparation, approval and implementation of the final CTMP, substantially in accordance with the outline CTMP, are secured through Requirement 15 of Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring construction traffic impacts on local roads and infrastructure are appropriately managed throughout the construction phase of the Scheme.
BMG-005	Construction and Decommissioning Hydrology, Flood Risk and Drainage	5) Currently there is no plan for the decommissioning of the cable therefore it would be left in the ground. There is no reassurance against potential future soil toxicity or physical obstruction to working the land.	The effects of decommissioning on soils and agricultural land are assessed in **ES Volume 1, Chapter 17 Soils and Agriculture [APP-069]**. As stated in this chapter, all land will be returned to its original use and condition as far as practicable and returned to the landowner. The effect on agricultural land quality at decommissioning would be influenced by the extent of disturbance caused by the removal of the Solar PV Panels, for example the presence and dimensions of leftover voids or the depth of the remaining underground cables. Currently, the most environmentally acceptable option is to leave the cables in-situ, although the cables could be removed by excavating at regular intervals and pulling the cable through to the extraction point, thus avoiding the need to excavate the entire cable trench. In either case, the effects would be less than those likely to occur during the construction phase.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Measures to manage decommissioning and reinstatement are set out in the **Outline Decommissioning Strategy [APP-279]**, which has been submitted as part of the DCO Application. The Decommissioning Strategy will include robust methodologies and control points to avoid contamination of the underlying land with physical or chemical contaminants and will be applied in conjunction with the Soil Resources Management Plan (SRMP) in order to promote successful reinstatement. A detailed Decommissioning Strategy will be prepared substantially in accordance with the **Outline Decommissioning Strategy [APP-279]** and must be submitted to and approved by the relevant local planning authority prior to the commencement of decommissioning. This is secured through Requirement 20 in Schedule 2 of the **Draft Development Consent Order [APP-016]**. In addition, the Applicant is seeking a time-limited consent for the Scheme to have an operational period of 60 years, with decommissioning to take place following cessation of operation. This is secured by Requirement 20 in Schedule 2 of the **Draft DCO [APP-016]**. An assessment of the effects of the Scheme on soils and agricultural land quality is provided in **ES Volume 1, Chapter 17 Soils and Agriculture [APP-069]**. This chapter considers baseline soil conditions and agricultural land quality and assesses the likely significant effects arising from construction, operation, maintenance and decommissioning of the Scheme. The assessment identifies appropriate embedded mitigation measures to avoid, reduce and manage effects on soils and land quality. The Applicant notes that the approach to characterising the soil resource was agreed in principle but is under further discussion with Natural England and is set out in the relevant **Statement of Common Ground** to be submitted at Deadline 1. Measures to control soil handling, storage and reinstatement

Reference	Theme	Comments/Issues Raised	Applicant's Response
			are set out in the Outline **Soil Resources Management Plan (SRMP) [APP-280]**, which accompanies the DCO application. The SRMP provides the framework for detailed soil management methods to be implemented during construction, operation and decommissioning, ensuring that soil structure, quality and function are protected and restored. The assessment in **ES Volume 1, Chapter 17 Soils and Agriculture [APP-069]** concludes that the removal of land from intensive arable cultivation during the operational phase is expected to lead to improvements in soil health, quality and structure. This results in a temporary, moderate beneficial effect on soil resources during the operational and decommissioning phases of the Scheme, which is assessed as significant (see Chapter 17, Section 17.12). Through the establishment and maintenance of long-term grassland beneath and between the solar arrays, soils within the Solar PV Sites are anticipated to improve over the lifetime of the Scheme. This would constitute a low magnitude of change to high sensitivity soils, giving rise to a temporary, moderate beneficial effect on soil resources during the decommissioning phase.

6.79 Caroline Clark

Table 6-79 RR-0605

Reference	Theme	Comments/Issues Raised	Applicant's Response
CC-001	Transport and Access Noise and Vibration	Apart from the obvious inconvenience our village will suffer due to congestion from Lorrie's on roads that aren't even fit for cars (pot holes is for another day!) noise pollution of the Lorrie's passing on our roads morning, noon and night general pollution from Lorrie's passing through the village with dust particles effecting out health	An assessment of the effects of construction activities on air quality is provided in **ES Volume 1, Chapter 15: Air Quality [APP-067]**. The assessment considers potential emissions from construction dust, construction vehicle exhausts and Non-Road Mobile Machinery (NRMM), and has been undertaken in accordance with relevant best practice guidance. Further detail on the construction dust assessment is provided in **ES Volume 3, Appendix 15-1: Construction Dust Methodology and Assessment [APP-238]**. The assessment concludes that, with embedded mitigation measures in place, construction-phase air quality effects would not be significant. Mitigation measures to control dust and emissions during construction are set out in the **Outline Construction Environmental Management Plan [APP-277]** and the **Outline Construction Traffic Management Plan [APP-287]**. These include measures such as dust suppression, site management controls, routing and scheduling of construction traffic, and management of plant and machinery. The preparation, approval and implementation of detailed construction management plans, substantially in accordance with the outline plans, are secured through Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that air quality impacts during construction are appropriately controlled.
CC-002	Ecology and Biodiversity Soils and Agriculture	Of which all the above will effect my family personally But also the effect this solar park will have on our beautiful wildlife and the nature that surrounds us is nothing short of tragic. Killing hundreds of species of wildlife is surely not ok It simply does not make sense to rip up this farmland that has been providing food for the nation to provide solar energy for a small	Potential impacts on ecology and biodiversity are fully assessed in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**. This assessment considers baseline ecological conditions and evaluates likely significant effects arising during the construction, operation and decommissioning phases of the Scheme. It identifies avoidance, mitigation and enhancement measures to address potential impacts on habitats and protected and notable species. It also identifies opportunities for ecological enhancement, including the creation and long-term management of habitats, and delivery of biodiversity net gain. The assessment concludes that, with the identified embedded and additional

Reference	Theme	Comments/Issues Raised	Applicant's Response
		amount, when it could be provided from other sources such as industrial park roof tops, alongside motorways and general housing estates It's disgraceful to think that people are willing to go for the cheapest easiest option at the sacrifice of our beautiful countryside	mitigation measures in place, no unacceptable significant adverse effects on ecology and biodiversity are anticipated. The Applicant notes that the approach to the assessment in relation to ecology and biodiversity in general is under discussion with Wiltshire Council and Natural England and is set out in the relevant **Statements of Common Ground**to be submitted at Deadline 1. During construction, specific measures are proposed to avoid disturbance and displacement of wildlife. These include protective buffers around sensitive habitats and features, timing restrictions on vegetation clearance, pre-construction ecological surveys, species-specific mitigation, and pollution prevention controls which are set out in the **Outline Ecological Protection and Mitigation Strategy (EPMS) [APP-284]**. Measures to protect trees and hedgerows are also set out in **ES Volume 1, Chapter 10 Arboriculture [APP-062]**. The Scheme will also result in the cessation of intensive arable farming within the Solar PV Sites. As identified in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**, this is expected to reduce the ongoing application of herbicides and pesticides, supporting improvements in habitat quality over the operational lifetime of the Scheme. The reversion of existing arable land within the Solar PV Sites to predominantly grassland habitats can be expected to benefit a wide range protected and notable species, as identified in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**. Mitigation and enhancement measures are detailed in the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]** and the **Outline Ecological Protection and Mitigation Strategy (OEPMS) [APP-284]**, which set out habitat creation, species protection measures, buffer zones and long-term ecological management. The preparation, approval and implementation of the detailed

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Landscape and Ecological Management Plan, substantially in accordance with the **OLEMP [APP-283]**, are secured through Requirement 7 in Schedule 2 of the **Draft Development Consent Order [APP-016]**. The preparation, approval and implementation of the detailed Ecological Protection and Mitigation Strategy, substantially in accordance with the O**EPMS [APP-284]**, are secured through Requirement 8 in Schedule 2 of the **Draft Development Consent Order [APP-016]**. These requirements ensure that ecological protection and enhancement measures are delivered and maintained throughout construction and operation of the Scheme. An assessment of the potential effects of the Scheme on soils and agricultural land is provided in **ES Volume 1, Chapter 17 Soils and Agriculture [APP-069]**. This chapter considers baseline agricultural land quality, including Best and Most Versatile (BMV) land, and assesses likely significant effects arising from construction, operation and decommissioning of the Scheme, together with embedded mitigation measures. The areas of each Agricultural Land Classification (ALC) grade affected by the Scheme are set out in **ES Chapter 17**, Section 17.7. Of the agricultural land within the Solar PV Sites, approximately 477.4 hectares (around 67%) is classified as Subgrade 3b or Grade 4 and is therefore not BMV land. There is no Grade 1 land, around 30.8 hectares (approximately 4%) of Grade 2 land, and approximately 209.3 hectares (around 29%) of Subgrade 3a land. The distribution of ALC grades is shown in **ES Volume 2, Figure 17-2: Agricultural Land Classification Mapping [APP-172]**. The Applicant has had regard to agricultural land quality in the design and site selection process and has sought, where practicable, to locate infrastructure on lower quality land. The Scheme will result in a temporary but long-term and reversible loss of agricultural land for the operational life of the Scheme. As set out in **ES Chapter 17**, Section 17.10, this gives rise to a temporary, long-term moderate adverse effect on

Reference	Theme	Comments/Issues Raised	Applicant's Response
			agricultural land overall, and a temporary, long-term major/moderate adverse effect on BMV land, both of which are assessed as significant. These effects are fully reported in the ES and are a matter for the Secretary of State to weigh in the planning balance against the need for the Scheme and its wider benefits. There are no significant permanent effects on agricultural land, as all land will be returned to its original use and condition as far as practicable following decommissioning. The Applicant notes that the approach to assessing the quality of the agricultural land is under further discussion with Natural England and is set out in the relevant **Statement of Common Ground** to be submitted at Deadline 1. Measures to avoid and minimise effects on soils and agricultural land are embedded within the Scheme design and secured through the DCO. These include the preparation and implementation of a **Soil Resources Management Plan (SRMP) [APP-280]**, which will control soil handling, storage and reinstatement during construction, operation and decommissioning, and a requirement to prepare and implement a Decommissioning Strategy in accordance with the **Outline Decommissioning Strategy [APP-279]**. Through the establishment and maintenance of long-term grassland beneath and between the solar arrays, soil health, quality and structure are anticipated to improve over the lifetime of the Scheme, resulting in a temporary, moderate beneficial effect on soil resources at decommissioning, which is assessed as significant (**ES Chapter 17**, Sections 17.10 and 17.12). In relation to suggestions that brownfield land or alternative locations should be used, including rooftop, these matters are addressed in **ES Volume 1, Chapter 4 Alternatives and Design Evolution** and in the **Statement of Need [APP-056 and APP-266]**. The Applicant has considered alternatives, including previously developed land and other forms of solar deployment, as part of the site selection and design evolution process. As

Reference	Theme	Comments/Issues Raised	Applicant's Response
			shown in Table 2-2 of **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]**, the Applicant has considered previously developed land/brownfield land over 1 hectare within the area of search, based on the brownfield land registers of the relevant Local Planning Authorities, and concluded that none of the sites are large enough to provide a viable land parcel of at least 40 ha and sites were not considered to be available as they have planning permission for residential development and/or are allocated for residential/mixed use development. National policy and government guidance, as set out in the **Statement of Need [APP-266]**, recognise that while rooftop and smaller-scale solar installations are an important part of the energy mix, they cannot alone meet the scale of capacity required to achieve clean power and net zero objectives. Large-scale ground-mounted solar therefore remains necessary in addition to, not instead of, rooftop solar. The Applicant does not consider that food security will be compromised by the Scheme (or solar energy more widely). The latest figures to September 2024 indicate that solar occupied around 21,200 ha of agricultural land in the UK. In 2025, 545,000 ha of arable land in England were left uncropped (source: Department for Environment, Food & Rural Affairs, Agricultural land use in England at 1 June 2025). It should also be noted that food security is not identified as an issue within the suite of Energy National Policy Statements or the National Planning Policy Framework (NPPF). Further, the Government's UK Solar Roadmap (2025) states that solar development is not considered to compromise food security, but that the climate and nature crisis poses the greatest long-term risk to food security- a risk which the Scheme directly helps to address by providing a secure, low-carbon source of electricity.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			As set out in Section 2 of the **Outline Decommissioning Strategy [APP-279],** post-decommissioning of the Scheme, the landowners would choose how the land is to be used and managed. The landowner may return all of the land to arable use, although it is likely that established habitats such as hedgerows and woodland would be retained given their potential benefits to agricultural land and the wider farming estate.

6.80 Ashton Hawker

Table 6-80 RR-0431

Reference	Theme	Comments/Issues Raised	Applicant's Response
AH-001	Socio-Economics, Tourism and Recreation	I am writing to register my strongest possible objection to the proposed Lime Down Solar scheme. As a lifelong resident, award-winning farmer, and business owner in Hullavington, I believe this industrial-scale development would inflict profound and irreversible damage on our community, landscape, and way of life. My objections are rooted in deep personal commitment and factual evidence, as outlined below:	The Applicant notes this Relevant Representation and confirms that the matters raised have been addressed in detail in the Applicant's responses below.
AH-002	Soils and Agriculture	Existential Threat to a Viable Local Business and Livelihoods This scheme poses a potentially direct threat to the ongoing viability of my farm business, which I have built over a lifetime. The loss of such a significant area of productive agricultural land that I currently farm would not only disrupt but could potentially destroy my enterprise. The consequence would be the unnecessary redundancy of direct and self-employed local people, undermining the local economy this project claims to support. It is contradictory to sacrifice existing, sustainable rural businesses for speculative energy gain.	The Applicant has responded in full to the comments made by the Hawker Farms regarding impacts on agricultural business in their Relevant Representation [RR-0431] above.
AH-003	Landscape and Visual Ecology and Biodiversity	The Permanent Industrialisation of a Precious, Historic Landscape Having been born, lived, and worked my entire life here, I can attest that this area is a truly rural, traditionally farmed landscape of immense value. It is rich in archaeology, heritage, and a cohesive ecological network. The proposal to industrialise it with vast	Landscape and Visual An assessment of landscape and visual effects is provided in the Landscape and Visual Impact Assessment (LVIA) presented in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**. The LVIA assesses effects on identified landscape and visual receptors, including residential properties and users of public rights of way, and identifies where significant effects may occur.

Reference	Theme	Comments/Issues Raised	Applicant's Response
		arrays of panels, substations, and high fencing would shatter its character forever. The description of the area from a local walking book-"a "*timeless scene*" of a traveller's caravan and grazing horses on Foxley Common-"captures exactly what we cherish and stand to lose irrevocably. This is not NIMBYism; it is the defence of a unique and irreplaceable environment.	The LVIA found no significant long term visual effects to Residential Properties as a consequence of the Scheme. The scale of development within the Order Limits has been significantly reduced from the layout assessed in the Preliminary Environmental Information Report (PEIR) through an iterative design process undertaken in response to consultation and in accordance with the mitigation hierarchy to avoid, reduce and mitigate adverse effects. As part of this design evolution, panels along the edge of the Cotswolds National Landscape and along the Fosse Way have been removed. Mitigation measures to address landscape and visual effects are set out in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**, Figure 3-4-1 to 3-4-5.2 **Landscape and Ecology Mitigation Plan [APP-084]** and detailed within the **Outline Landscape and Ecological Mitigation Plan (LEMP) [APP-283]** and the **Outline Ecological Protection and Mitigation Strategy (EPMS) [APP-284]**. These documents include proposals for new and enhanced planting, retention of existing hedgerows and woodland, and landscape integration measures to reduce visual effects over time. In addition, the Scheme design incorporates minimum offsets from existing landscape features, including residential properties, ancient woodland, woodland, hedgerows, public rights of way and watercourses, to further limit visual impacts. The preparation, approval and implementation of detailed landscape and ecological management plans, substantially in accordance with the **OLEMP [APP-283]** and **EPMS [APP-284]**, are secured through requirements in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that the identified mitigation measures are delivered and maintained throughout the lifetime of the Scheme. <u>Cultural Heritage</u>

Reference	Theme	Comments/Issues Raised	Applicant's Response
			The potential effects of the Scheme on cultural heritage, including archaeological assets dated to the Roman and medieval periods, are fully assessed in **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, supported by detailed technical appendices in **ES Volume 3, Appendices 12-1 to 12-7 [APP-219 to APP-231]**. The chapter considers baseline conditions, identifies built and archaeological heritage assets within the study area, and assesses likely effects during construction, operation and decommissioning, including effects on setting. The chapter concluded that, following mitigation, the residual effects on any archaeological assets including Roman and medieval period remains, would be neutral/negligible and therefore not significant (see **Volume 3, Appendix 12-8 Cultural Heritage Impact Assessment Tables [APP-232]**). The assessment is underpinned by extensive desk-based research, geophysical survey and evaluation trenching, as detailed in **ES Volume 3, Appendix 12-2: Archaeological Desk-Based Assessments [APP-220], Appendix 12-4: Archaeological Geophysical Survey Reports [APP-224], and Appendix 12-5: Interim Evaluation Trial Trenching Reports [APP-225].** The Applicant notes that the approach to the assessment has been agreed with Wiltshire Council and the methodology for the mitigation strategy is under discussion with Wiltshire Council and is set out in the relevant **Statement of Common Ground**to be submitted at Deadline 1. Embedded mitigation measures to avoid or reduce harm to heritage assets are set out in Section 12.9 of **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, with additional mitigation measures detailed in Section 12.11. An overarching archaeological mitigation strategy is provided in **ES Volume 3, Appendix 12-6: Outline Archaeological Mitigation Strategy [APP-230]**, which sets out the framework for further archaeological investigation, recording and protection where ground disturbance cannot be avoided.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			The preparation, approval and implementation of detailed archaeological Written Schemes of Investigation, substantially in accordance with the Outline Archaeological Mitigation Strategy, are secured through Requirement 12 of Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that appropriate protection, recording and mitigation are delivered before and during construction. Ecology and Biodiversity Potential impacts on ecology and biodiversity are fully assessed in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**. This assessment considers baseline ecological conditions and evaluates likely significant effects arising during the construction, operation and decommissioning phases of the Scheme. It identifies avoidance, mitigation and enhancement measures to address potential impacts on habitats and protected and notable species. It also identifies opportunities for ecological enhancement, including the creation and long-term management of habitats, and delivery of biodiversity net gain. The assessment concludes that, with the identified embedded and additional mitigation measures in place, no unacceptable significant adverse effects on ecology and biodiversity are anticipated. The Applicant notes that the approach to the assessment in relation to ecology and biodiversity in general is under discussion with Wiltshire Council and Natural England and is set out in the relevant **Statements of Common Ground**to be submitted at Deadline 1. During construction, specific measures are proposed to avoid disturbance and displacement of wildlife. These include protective buffers around sensitive habitats and features, timing restrictions on vegetation clearance, pre-construction ecological surveys, species-specific mitigation, and pollution prevention controls which are set out in the **Outline Ecological Protection and Mitigation Strategy (EPMS) [APP-284]**. Measures to protect trees and hedgerows are also set out in **ES Volume 1,**

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Chapter 10 Arboriculture [APP-062]. The Scheme will also result in the cessation of intensive arable farming within the Solar PV Sites. As identified in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**, this is expected to reduce the ongoing application of herbicides and pesticides, supporting improvements in habitat quality over the operational lifetime of the Scheme. The reversion of existing arable land within the Solar PV Sites to predominantly grassland habitats can be expected to benefit a wide range protected and notable species, as identified in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**. Mitigation and enhancement measures are detailed in the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]** and the **Outline Ecological Protection and Mitigation Strategy (OEPMS) [APP-284]**, which set out habitat creation, species protection measures, buffer zones and long-term ecological management. The preparation, approval and implementation of the detailed Landscape and Ecological Management Plan, substantially in accordance with the **OLEMP [APP-283]**, are secured through Requirement 7 in Schedule 2 of the **Draft Development Consent Order [APP-016]**. The preparation, approval and implementation of the detailed Ecological Protection and Mitigation Strategy, substantially in accordance with the O**EPMS [APP-284]**, are secured through Requirement 8 in Schedule 2 of the **Draft Development Consent Order [APP-016]**. These requirements ensure that ecological protection and enhancement measures are delivered and maintained throughout construction and operation of the Scheme.
AH-004	Ecology and Biodiversity	Direct Contradiction of Ecological Excellence and Net Gain Principles For decades, I have dedicated myself to enhancing the ecology of my land, efforts recognised with national awards. This proposal is in direct and shocking	Potential impacts of the Scheme on ecology and biodiversity are assessed in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**, which considers baseline conditions and evaluates likely effects during construction, operation and decommissioning. The assessment identifies embedded and additional mitigation measures and concludes that, with these

Reference	Theme	Comments/Issues Raised	Applicant's Response
		conflict with all good environmental practice. The developer's own assessment admits to a 73% loss of skylarks-"a key biodiversity indicator species. The installation of miles of high fencing will fragment habitats, block wildlife corridors, and confuse fauna. This scheme does not represent a "*green*" solution; it is an ecological retrograde step that replaces a living, managed landscape with a sterile industrial site.	measures in place, no unacceptable significant adverse effects on ecology and biodiversity are anticipated. The assessment identifies skylarks as a key species of conservation interest within the Scheme area. It concludes that a proportion of the current skylark population will be displaced from the Solar PV Sites, which will give rise to an adverse residual effect at a Local level. Skylark-specific mitigation and habitat enhancement measures are incorporated into the Scheme design to reduce effects as far as practicable. These include the provision of suitably large, open set-aside and grassland habitats designed to provide appropriate breeding and foraging conditions. These measures are illustrated in **ES Volume 2, Figure 3-4: Landscape and Ecological Mitigation Plan [APP-084]** and detailed in the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]**. The Scheme design incorporates fencing around the Solar PV Arrays that is permeable to wildlife, with the exception of deer. This means animals (excluding deer only) will be able to freely access habitats within the Solar PV Sites without the need for wildlife gates. In addition, wide buffers are retained around the peripheries of the Solar PV Sites to allow wildlife, including deer, to move between favoured habitats. These measures are described in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]** and detailed in the **Outline Ecological Protection and Mitigation Strategy (OEPMS) [APP-284]**.
AH-005	Hydrology, Flood Risk and Drainage	Unacceptable Risk to Essential Water Resources My farm is served by three boreholes providing water for a household and livestock. The construction phase (with potential for chemical spills, lubricant leaks, and soil compaction) and the long-term presence of this infrastructure pose a clear contamination risk to the aquifer. No credible, long-term guarantee can be	The Applicant acknowledges the importance of private boreholes for domestic and agricultural use. Groundwater receptors and pollution pathways have been assessed using a source–pathway–receptor approach and no credible mechanism has been identified by which the Scheme would contaminate groundwater or adversely affect borehole supplies. Construction-phase pollution risks are controlled through embedded mitigation and secured construction management measures, avoiding significant adverse effects on controlled waters. **ES Volume 1, Chapter 11 Hydrology, Flood Risk and Drainage [APP-063]** and **Outline Construction Environmental Management Plan**

Reference	Theme	Comments/Issues Raised	Applicant's Response
		offered to mitigate this threat to a fundamental resource. The precautionary principle must apply.	**[APP-277]**. No amendments to the application documents are required.
AH-006	Human Health	Severe Detriment to Community Wellbeing and Mental Health The mental wellbeing and quality of life for hundreds of residents in directly affected villages will suffer immensely. Our network of public rights of way, constantly used for recreation and mental respite, would become routes through an industrial facility.	Impacts on mental health and wellbeing are assessed in **ES Volume 1, Chapter 18: Human Health [APP-070]**. This chapter provides a comprehensive assessment of the Scheme's potential effects on human health, including mental health and wellbeing, through consideration of a broad range of health determinants. These include access to open space and recreation, transport and connectivity, community identity and cohesion, employment and income, noise and vibration, air quality, and access to health and social care services. The assessment applies a health "*lens*" to the findings of relevant technical chapters and concludes that, with embedded mitigation and additional measures secured, the Scheme would not give rise to significant adverse effects on population health, including mental health and wellbeing. The assessment focuses on communities within a 2 km Study Area surrounding the Scheme, identified as those most likely to experience potential health-related effects. Baseline analysis demonstrates that rates of poor mental health within the Study Area are generally lower than national averages, and the assessment considers potential pathways by which the Scheme could influence mental wellbeing, including changes to environment, amenity, access and community factors. Residual effects following mitigation are assessed as not significant at any phase of the Scheme. Consultation with Wiltshire Council's Public Health Team has informed the approach to mental health considerations, as documented in **ES Volume 3, Appendix 18-1: Human Health Consultation [APP-244]**. Through this engagement, the Applicant has committed to signposting locally available mental health and wellbeing resources to members of the public engaging with the Scheme, using information provided by Wiltshire Council's Public Health Team. The Applicant will continue to monitor consultation responses relating to mental health and will provide appropriate signposting to existing local

Reference	Theme	Comments/Issues Raised	Applicant's Response
			support services where requested. The Applicant notes that the assessment methodology for health and wellbeing has been agreed with Wiltshire Council's Public Health team and is set out in the Statement of Common Ground with Wiltshire Councilto be submitted at Deadline 1. A detailed assessment of the likely significance of effects from the Scheme on the use and desirability of individual PRoW, and recreational access to the countryside, has been included in the **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** and **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]**. This assessment considers the impact on individual recreational routes – be that practically in their use, and their enjoyment and desirability. The Applicant confirms that the majority of significant adverse effects can be mitigated, however understands that some significant adverse effects to users of PROWs and unsurfaced roads in Lime Down E cannot be mitigated further during construction. No significant residual effects are anticipated during the operational phase of the Scheme. The Applicant notes that the assessment of PROW impacts and mitigation is under discussion with Wiltshire Council's Countryside Access Team and is set out in the Statement of Common Ground with Wiltshire Councilto be submitted at Deadline 1. The Applicant confirms that existing PRoW are to be controlled within the Scheme design with PRoW management strategies set out in the **Outline Public Rights of Way and Permissive Paths Management Plan (PROWPPMP) [APP-282].** These are confirmed as embedded mitigation measures in Section 16.9 of **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]**. New permissive access routes have been included in the Scheme design, shown as Work No.10 on the **Works Plan [APP-007]** and shown on **ES Volume 2, Figure 3-4: Landscape**

Reference	Theme	Comments/Issues Raised	Applicant's Response
			and Ecology Mitigation Plan [APP-283]. These are considered as additional mitigation and enhancement measures in Section 16.11 of ES Chapter 16. The PRoW and Permissive Paths MP is secured through Requirement 16 of Schedule 2 of the **Draft DCO [APP-016]**. The preparation, approval and implementation of the detailed CEMP and CTMP, substantially in accordance with the outline plans, are secured through Requirements 13 and 15 respectively in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that impacts on PRoW and recreational routes are appropriately managed during construction
AH-007	Other Environmental Matters	The profound visual blight, potential for glint and glare, ambient noise from inverters, and the unnatural light pollution will shatter the peace and dark skies that define our countryside. The harm to community health is a material planning consideration that cannot be dismissed.	The Applicant notes that visual impact has been addressed in detail in the Applicant's responses above. <u>Noise</u> The noise impacts from the operation of the Scheme and its components are assessed in Section 14.10 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**, with supporting modelling provided in **ES Volume 3, Appendix 14-4: Noise Modelling [APP-237]**. A penalty has been applied to predicted noise levels from the Solar PV Sites to account for the distinctive nature of the sound. Potential mitigation measures are detailed in Section 14.9 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**, and with such measures in place, significant effects from operational noise are not expected. The **Outline Operational Environmental Management Plan [APP-278]** commits to noise levels from the Scheme at residential dwellings being the same as or below those modelled in the ES. This provides assurance that significant effects from operational noise will be avoided, while allowing flexibility in how this is achieved. The preparation, approval and implementation of the detailed OEMP, substantially in accordance with the outline plan, are

Reference	Theme	Comments/Issues Raised	Applicant's Response
			secured through Requirement 14 of Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring operational noise is appropriately controlled throughout the lifetime of the Scheme. Light pollution Potential effects relating to lighting are assessed in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**, which considers the implications of construction, operational and decommissioning lighting on landscape and visual receptors. The Landscape and Visual Impact Assessment (LVIA) has considered the construction, operational and decommissioning lighting proposals for the Scheme, with details of lighting design, directionality and intermittent lighting set out in **ES Volume 1, Chapter 3: The Scheme [APP-055]** and further discussed in **ES Volume 1, Chapter 20: Other Environmental Matters [APP-072]**. The Scheme has been designed to minimise the need for external lighting. Lighting is not required within the Solar PV Arrays during the operational phase. Motion-sensing security lighting will be provided within substations and the BESS Area and will be used only for maintenance and security purposes. Temporary site lighting during construction and decommissioning will be required to enable safe working during hours of darkness. This lighting will be designed, as far as reasonably practicable, to minimise light spill outside the Site and Cable Route Corridor, particularly towards residential properties, highways and ecological receptors. Standard good practice measures will be employed to minimise glare and light spill during construction, operation and decommissioning. There will be no lighting on perimeter fencing. Measures to control construction lighting are set out in the **Outline Construction Environmental Management Plan**

Reference	Theme	Comments/Issues Raised	Applicant's Response
			[APP-277], and operational lighting controls form part of the **Outline Operational Environmental Management Plan [APP-278]**. The preparation, approval and implementation of detailed management plans, substantially in accordance with these outline plans, are secured through requirements in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring lighting impacts are appropriately controlled throughout the lifetime of the Scheme. <u>Health</u> Impacts on physical health and wellbeing are assessed in **ES Volume 1, Chapter 18: Human Health [APP-070]**. This chapter provides a comprehensive assessment of the Scheme's potential effects on human health, including physical health and wellbeing, through consideration of a broad range of health determinants with physical health pathways. These include access to housing, access to open space and recreation, transport and connectivity, climate change, air quality, water quality, land quality, noise and vibration, and access to health and social care services. The assessment applies a health-based review of relevant technical chapters to identify potential pathways by which the Scheme could affect physical health. It concludes that, with embedded mitigation and additional measures secured, the Scheme would not give rise to significant adverse effects on population physical health at any phase of the Scheme. Priority has been given in the assessment to communities most likely to experience potential health-related effects, within the 2 km Study Area surrounding the Scheme. The Applicant notes that the assessment methodology for health and wellbeing has been agreed with Wiltshire Council's Public Health team and is set out in the Statement of Common Ground with Wiltshire Councilto be submitted at Deadline 1.
AH-008	Soils and Agriculture	Conclusion The Lime Down Solar scheme is	The Applicant has responded in full to the comments made by Hawker Farms regarding impacts on their agricultural business,

Reference	Theme	Comments/Issues Raised	Applicant's Response
	Ecology and Biodiversity Cultural Heritage Community Benefits	fundamentally the wrong development in the wrong place. It would: - Potentially destroy a thriving agricultural business and the jobs it supports. - Permanently industrialise a historic, cherished, and visually coherent rural landscape. - Cause significant ecological harm, directly contradicting national and local biodiversity policies. - Threaten essential water resources. - Severely degrade the wellbeing of a settled community. This is not about opposition to renewable energy, but about the critical importance of appropriate size and siting with community benefit. This proposal prioritises developer convenience over true sustainability, which must balance energy needs with the protection of our best agricultural land, our most valued landscapes, and the communities that sustain them. I urge you to reject this application outright.	and to the other matters raised in their Relevant Representation [RR-872], above.

6.81 Matthew Dominik Shipp

Table 6-81 RR-3086

Reference	Theme	Comments/Issues Raised	Applicant's Response
MDS-001	Ecology and Biodiversity	Formal Objection to the Proposed Lime Down Project Submission to Central Government Review Body I submit this representation as a formal and principled objection to the proposed Lime Down project and its associated compound. I have lived in the village of Grittleton since infancy and am now (Redacted). My connection to this place is lifelong and deeply rooted. I grew up as a countryside boy, spending much of my childhood outdoors and learning responsible land management, wildlife protection, and respect for the land from the local farm manager and farming community. From an early age I understood that the countryside is not simply a backdrop, but a living, working landscape that must be actively cared for if it is to endure. That connection remains today. I am deeply invested in the protection of the land, the wildlife it supports, and the people who rely on it for their livelihoods. This proposal threatens all three.	The Applicant notes this comment and has responded to the matters raised in Relevant Representation [RR-3086] detail below.
MDS-002	Landscape and Visual Socio-Economics, Tourism and Recreation	Grittleton is a small, historic village set within a protected landscape of outstanding natural beauty. The village's built environment is predominantly listed, and the surrounding land is designated Green Belt and Area of Outstanding Natural Beauty. These protections recognise that this landscape is visually exceptional, ecologically rich,	**ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, supported by **Appendix 12.1: Heritage Statement [APP-219]**, has assessed the potential impact of the scheme on Grittleton Conservation Area. The cable route corridor is proposed to pass to the east of Grittleton Conservation Area (Fields F107-F114). While the Scheme will comprise temporary and localised construction activity as part of the installation of cabling, the assessment identified that will be no impact to the character and appearance of Grittleton Conservation Area. Since the design presented at PEIR stage, Field C26, the westernmost part of

Reference	Theme	Comments/Issues Raised	Applicant's Response
	Cultural Heritage	agriculturally productive, and historically significant. This is not merely a settlement of houses, but a functioning and resilient rural community. The village is inclusive and intergenerational, caring for both its youngest and oldest residents. We collectively fund, maintain, and manage many of our own amenities, including a cricket pitch and pavilion, children's playground, and multi-use games area, alongside ongoing fundraising for our church. We strive to be largely self-sufficient and make minimal demands on public resources. My wife and I are the joint owners of (Redacted) a Grade II* listed Victorian mansion located at the centre of the village. The house has been in my family's custodianship for nearly 60 years and is now entering its third generation, soon to pass to the fourth. We regard ourselves not as owners in the conventional sense, but as custodians of a nationally important heritage asset. (Redacted) is integral to village life. Its grounds provide open space used by villagers for recreation and community events, including tennis, football, netball, volleyball, and fundraising activities. The house and estate form a key part of the village's historic setting and social fabric. Impact on Landscape, Agriculture, and Rural Livelihoods Historic Landscape and Archaeological	Field C25, and the majority of Field C13 have been entirely removed from the Order Limits. Solar PV Panels have also been removed entirely from within Fields B1-B5, C24-C25, and C13. A number of fields abutting the Fosse Way within which Solar PV Panels will be erected have had offsets established with their boundaries with Fosse Way, including Fields B6, C10-C12, and C22-C23. **Appendix 12.1: Heritage Statement [APP-219]** identified that the overall setting and significance of the Fosse Way will remain intact, and the asset will retain its legibility as a roadway within a largely agrarian landscape. Consequently no significant effects were identified to the asset. Annex 1 of **ES Volume 3, Appendix 12-1: Heritage Statement [APP-219]** details assets scoped in for assessment and was used during consultation with Historic England and Wiltshire Council. Scoped in assets are considered to be agreed with both stakeholders. Grade II* Grittleton House (NHLE: 1022310) was scoped out of the assessment as there was no potential for any impact as a result of the Scheme. While direct impacts on Grittleton House have not been assessed, the assessment of tourism and recreation impacts in **ES Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** and the supporting **ES Volume 3 Appendix 16-2 Tourism and Recreation Receptor Tables [APP-241]** have assessed the likely impacts of the Scheme at construction, operation, peak replacement, and decommissioning on Grittleton Conservation Area as a tourism and visitor destination, and on individual PROWs connecting to Grittleton village that are affected by the Scheme. The assessment therein identifies up to a medium-term temporary moderate-minor adverse effect due to views of cable construction works, the construction compound, and HGV traffic within the conservation area. The Applicant has committed to the mitigation measures set out in the extremely important to local people, and has committed to the mitigation measures in the **OCEMP [APP-277]**, **OOEMP [APP-278]**, **OCTMP [APP-287]**, and **OPROWPPMP [APP-282]** (each secured by requirement in Schedule 2 to the **Draft DCO [APP-**

Reference	Theme	Comments/Issues Raised	Applicant's Response
		Sensitivity The area is historically significant, containing ancient routes including the Roman Fosse Way, which forms part of the historic framework of the region. The value of such features lies not only in their physical remains, but in their setting and legibility within the wider landscape. Large-scale industrial development risks eroding this historic coherence and diminishing the ability to understand and appreciate the area's archaeological significance. Impact on Heritage Assets, Setting, and Venue Viability The proposed Lime Down compound would be located in direct and uninterrupted view of Grittleton House, including its principal wedding and events areas such as outdoor ceremony spaces, reception terraces, arrival routes, and photographic settings. (Redacted) operates as a wedding and events venue precisely because of its historic architecture, tranquillity, and unspoilt rural outlook. Couples choose the venue for its sense of arrival, visual harmony, and immersion in a protected countryside setting. The presence of an industrial compound -" *including fencing, plant, lighting, security infrastructure, and vehicle movements* -" would fundamentally undermine this experience. This harm is neither abstract nor speculative. Wedding venues operate in a highly competitive market where	**016]**) to ensure these impacts are minimised as much as practicable.

Reference	Theme	Comments/Issues Raised	Applicant's Response
		setting, photography, and guest experience are critical. A visually intrusive compound in constant view would act as a clear deterrent to prospective couples, resulting in lost bookings, reputational damage, and reduced income. This directly threatens the long-term viability of a use that actively sustains the conservation and maintenance of a Grade II* listed building. National planning policy recognises that the optimal viable use of heritage assets is often essential to their preservation. A development that compromises that viability must be regarded as causing serious harm, even where the building's fabric remains untouched. Should (Redacted) become unviable, it would likely be sold to a commercial operator with no local or community connection, resulting in the permanent loss of a valued community asset. Any comparable development proposed by us within the curtilage of the estate would be refused outright under existing planning controls. Even minor changes are subject to rigorous and costly scrutiny. This raises a fundamental issue of consistency and proportionality in decision-making. Conclusion The village, its listed buildings, farmland, wildlife habitats, and historic landscape are protected precisely to prevent this form of cumulative harm. Allowing the Lime Down development would undermine confidence in national	

Reference	Theme	Comments/Issues Raised	Applicant's Response
		protections for heritage assets, biodiversity, rural communities, and food-producing land. I respectfully ask the Review Body to consider how this proposal aligns with statutory heritage duties, environmental protections, and the long-term public interest. I cannot understand how a development of this scale has been allowed to reach such an advanced stage in such a sensitive location. For reasons of fairness, consistency, and responsible stewardship, the Lime Down proposal should be refused.	
MDS-003	Soils and Agriculture	The Lime Down proposal extends far beyond a single compound. The planned solar infrastructure is expected to cover over 2,000 acres across the local area, representing a profound and lasting change to the character and function of the countryside. This land is actively farmed and supports local food production. Farmers will be directly affected through the loss of grazing land and productive agricultural use at a time when domestic food security and sustainable local supply chains are of increasing national importance. This is not marginal or low-value land, but part of a long-established working landscape supporting rural employment and stewardship.	The Scheme has been designed to deliver the greatest possible benefit from the available land and the available grid connection, whilst avoiding, minimising and/or mitigating harmful environmental effects. As per the description set out in **ES Volume 1, Chapter 3: The Scheme [APP-055]** the total area within the DCO Order Limits encompasses approximately 1,237 hectares (ha). Of this, the 'Solar PV Sites' comprise approximately 749.1 ha of land. Around 479.5 ha of this land is proposed as being required for installation of solar PV, battery storage, and associated infrastructure. The remaining 269.5 ha would provide areas dedicated to ecological mitigation, measurable Biodiversity Net Gain (BNG) delivery, landscaping, offsets and agricultural land managed for environmental enhancement and habitat creation. The Applicant remains committed to delivering a Scheme that makes a meaningful contribution to the UK's transition to net zero, while also seeking to minimise adverse impacts and maximise opportunities for environmental enhancement and community benefits. The potential effects of the Scheme on agricultural land are assessed in **ES Volume 1, Chapter 17 Soils and Agriculture**

Reference	Theme	Comments/Issues Raised	Applicant's Response
			[APP-069], which considers baseline agricultural land use and quality and evaluates likely effects during construction, operation and decommissioning. The assessment confirms that the Scheme will result in a temporary and reversible loss of agricultural land during the operational period, with all land to be returned to its original use and condition as far as practicable following decommissioning. No permanent loss of agricultural land is anticipated. The areas of each Agricultural Land Classification (ALC) grade affected by the Scheme are set out in **ES Chapter 17**, Section 17.7. Of the agricultural land within the Solar PV Sites, approximately 477.4 hectares (around 67%) is classified as Subgrade 3b or Grade 4 and is therefore not BMV land. There is no Grade 1 land, around 30.8 hectares (approximately 4%) of Grade 2 land, and approximately 209.3 hectares (around 29%) of Subgrade 3a land. The distribution of ALC grades is shown in **ES Volume 2, Figure 17-2: Agricultural Land Classification Mapping [APP-172]**. The Applicant has had regard to agricultural land quality in the design and site selection process and has sought, where practicable, to locate infrastructure on lower quality land. The Scheme will result in a temporary but long-term and reversible loss of agricultural land for the operational life of the Scheme. As set out in **ES Chapter 17**, Section 17.10, this gives rise to a temporary, long-term moderate adverse effect on agricultural land overall, and a temporary, long-term major/moderate adverse effect on BMV land, both of which are assessed as significant. These effects are fully reported in the ES and are a matter for the Secretary of State to weigh in the planning balance against the need for the Scheme and its wider benefits. There are no significant permanent effects on agricultural land, as all land will be returned to its original use and condition as far as practicable following decommissioning. The Applicant notes that the approach to assessing the quality of the agricultural land is under further discussion with Natural

Reference	Theme	Comments/Issues Raised	Applicant's Response
			England and is set out in the relevant **Statement of Common Ground**. Measures to avoid and minimise effects on soils and agricultural land are embedded within the Scheme design and secured through the DCO. These include the preparation and implementation of a **Soil Resources Management Plan (SRMP) [APP-280]**, which will control soil handling, storage and reinstatement during construction, operation and decommissioning, and a requirement to prepare and implement a Decommissioning Strategy in accordance with the **Outline Decommissioning Strategy [APP-279]**. Through the establishment and maintenance of long-term grassland beneath and between the solar arrays, soil health, quality and structure are anticipated to improve over the lifetime of the Scheme, resulting in a temporary, moderate beneficial effect on soil resources at decommissioning, which is assessed as significant (**ES Chapter 17**, Sections 17.10 and 17.12). The Applicant does not consider that food security will be compromised by the Scheme (or solar energy more widely). The latest figures to September 2024 indicate that solar occupied around 21,200 ha of agricultural land in the UK. In 2025, 545,000 ha of arable land in England were left uncropped (source: Department for Environment, Food & Rural Affairs, Agricultural land use in England at 1 June 2025). It should also be noted that food security is not identified as an issue within the suite of Energy National Policy Statements or the National Planning Policy Framework (NPPF). Further, the Government's UK Solar Roadmap (2025) states that solar development is not considered to compromise food security, but that the climate and nature crisis poses the greatest long-term risk to food security- a risk which the Scheme directly helps to address by providing a secure, low-carbon source of electricity.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			As set out in Section 2 of the **Outline Decommissioning Strategy [APP-279],** post-decommissioning of the Scheme, the landowners would choose how the land is to be used and managed. The landowner may return all of the land to arable use, although it is likely that established habitats such as hedgerows and woodland would be retained given their potential benefits to agricultural land and the wider farming estate.
MDS-004	Ecology and Biodiversity	Ecological Harm and Loss of Biodiversity The countryside surrounding Grittleton supports a rich and interconnected ecosystem. Hedgerows, field margins, and pasture provide essential nesting, foraging, and movement corridors. Their removal or fragmentation would result in permanent habitat loss. Protected species known to be present include skylarks, bats, and badgers. Skylarks rely on open farmland for breeding and are highly sensitive to disturbance. Bats depend on hedgerows and dark corridors for navigation and feeding, while badgers require undisturbed land for sett integrity and foraging. The scale of the Lime Down development presents a clear risk of cumulative ecological harm that mitigation measures cannot adequately offset.	Potential impacts of the Scheme on ecology and biodiversity are assessed in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**, which considers baseline conditions and evaluates likely effects during construction, operation and decommissioning. The assessment identifies embedded and additional mitigation measures and concludes that, with these measures in place, no unacceptable significant adverse effects on ecology and biodiversity are anticipated. Potential impacts of the Scheme on ecology and biodiversity are assessed in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**, which considers baseline conditions and evaluates likely effects during construction, operation and decommissioning. The assessment identifies embedded and additional mitigation measures and concludes that, with these measures in place, no unacceptable significant adverse effects on ecology and biodiversity are anticipated. The assessment identifies skylarks as a key species of conservation interest within the Scheme area. It concludes that a proportion of the current skylark population will be displaced from the Solar PV Sites, which will give rise to an adverse residual effect at a Local level. Skylark-specific mitigation and habitat enhancement measures are incorporated into the Scheme design to reduce effects as far as practicable. These include the provision of suitably large, open set-aside and grassland habitats designed to provide appropriate breeding and foraging conditions. These measures are illustrated in **ES Volume 2, Figure 3-4: Landscape and Ecological Mitigation Plan [APP-084]** and detailed in the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]**.

Reference	Theme	Comments/Issues Raised	Applicant's Response
			The impacts of the Scheme on bats and badgers are assessed within **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**. No significant adverse effects on either species group are anticipated, and badgers are likely to benefit from enhanced foraging and sett buildings opportunities as a result of considerably increased grassland and other habitat creation and enhancement measures shown in **ES Volume 2, Figure 3-4: Landscape and Ecological Mitigation Plan [APP-084]** and detailed in the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]**.

6.82 Martin Genner

Table 6-82 RR-3034

Reference	Theme	Comments/Issues Raised	Applicant's Response
MG-001	Ecology and Biodiversity	I am concerned about the industrialisation of the rural environment, and the potential negative impacts on agriculture and biodiversity. I have seen no information on the likely environmental impact of the proposed development.	The Scheme has been designed to deliver the greatest possible benefit from the available land and the available grid connection, whilst avoiding, minimising and/or mitigating harmful environmental effects. As per the description set out in **ES Volume 1, Chapter 3: The Scheme [APP-055]** the total area within the DCO Order Limits encompasses approximately 1,237 hectares (ha). Of this, the 'Solar PV Sites' comprise approximately 749.1 ha of land. Around 479.5 ha of this land is proposed as being required for installation of solar PV, battery storage, and associated infrastructure. The remaining 269.5 ha would provide areas dedicated to ecological mitigation, measurable Biodiversity Net Gain (BNG) delivery, landscaping, offsets and agricultural land managed for environmental enhancement and habitat creation. The Applicant remains committed to delivering a Scheme that makes a meaningful contribution to the UK's transition to net zero, while also seeking to minimise adverse impacts and maximise opportunities for environmental enhancement and community benefits. An assessment of the potential effects of the Scheme on soils and agricultural land is provided in **ES Volume 1, Chapter 17 Soils and Agriculture [APP-069]**. This chapter considers baseline agricultural land quality, including Best and Most Versatile (BMV) land, and assesses likely significant effects arising from construction, operation and decommissioning of the Scheme, together with embedded mitigation measures. The areas of each Agricultural Land Classification (ALC) grade affected by the Scheme are set out in **ES Chapter 17**, Section 17.7. Of the agricultural land within the Solar PV Sites, approximately 477.4 hectares (around 67%) is classified as Subgrade 3b or Grade 4 and is therefore not BMV land. There is no Grade 1 land, around 30.8 hectares (approximately 4%) of Grade 2 land, and approximately 209.3 hectares (around 29%) of Subgrade 3a land. The distribution of ALC grades is shown in **ES**

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Volume 2, Figure 17-2: Agricultural Land Classification Mapping [APP-172]. The Applicant has had regard to agricultural land quality in the design and site selection process and has sought, where practicable, to locate infrastructure on lower quality land. The Scheme will result in a temporary but long-term and reversible loss of agricultural land for the operational life of the Scheme. As set out in **ES Chapter 17**, Section 17.10, this gives rise to a temporary, long-term moderate adverse effect on agricultural land overall, and a temporary, long-term major/moderate adverse effect on BMV land, both of which are assessed as significant. These effects are fully reported in the ES and are a matter for the Secretary of State to weigh in the planning balance against the need for the Scheme and its wider benefits. There are no significant permanent effects on agricultural land, as all land will be returned to its original use and condition as far as practicable following decommissioning. The Applicant notes that the approach to assessing the quality of the agricultural land is under further discussion with Natural England and is set out in the relevant **Statement of Common Ground** to be submitted at Deadline 1. Measures to avoid and minimise effects on soils and agricultural land are embedded within the Scheme design and secured through the DCO. These include the preparation and implementation of a **Soil Resources Management Plan (SRMP) [APP-280]**, which will control soil handling, storage and reinstatement during construction, operation and decommissioning, and a requirement to prepare and implement a Decommissioning Strategy in accordance with the **Outline Decommissioning Strategy [APP-279]**. Through the establishment and maintenance of long-term grassland beneath and between the solar arrays, soil health, quality and structure are anticipated to improve over the lifetime of the Scheme, resulting in a temporary, moderate beneficial

Reference	Theme	Comments/Issues Raised	Applicant's Response
			effect on soil resources at decommissioning, which is assessed as significant (**ES Chapter 17**, Sections 17.10 and 17.12). Potential impacts on ecology and biodiversity are fully assessed in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**. This assessment considers baseline ecological conditions and evaluates likely significant effects arising during the construction, operation and decommissioning phases of the Scheme. It identifies avoidance, mitigation and enhancement measures to address potential impacts on habitats and protected and notable species. It also identifies opportunities for ecological enhancement, including the creation and long-term management of habitats, and delivery of biodiversity net gain. The assessment concludes that, with the identified embedded and additional mitigation measures in place, no unacceptable significant adverse effects on ecology and biodiversity are anticipated. The Applicant notes that the approach to the assessment in relation to ecology and biodiversity in general is under discussion with Wiltshire Council and Natural England and is set out in the relevant **Statements of Common Ground**to be submitted at Deadline 1. During construction, specific measures are proposed to avoid disturbance and displacement of wildlife. These include protective buffers around sensitive habitats and features, timing restrictions on vegetation clearance, pre-construction ecological surveys, species-specific mitigation, and pollution prevention controls which are set out in the **Outline Ecological Protection and Mitigation Strategy (EPMS) [APP-284]**. Measures to protect trees and hedgerows are also set out in **ES Volume 1, Chapter 10 Arboriculture [APP-062]**. The Scheme will also result in the cessation of intensive arable farming within the Solar PV Sites. As identified in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**, this is expected to reduce the ongoing application of herbicides and pesticides, supporting improvements in habitat quality over the

Reference	Theme	Comments/Issues Raised	Applicant's Response
			operational lifetime of the Scheme. The reversion of existing arable land within the Solar PV Sites to predominantly grassland habitats can be expected to benefit a wide range protected and notable species, as identified in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**. Mitigation and enhancement measures are detailed in the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]** and the **Outline Ecological Protection and Mitigation Strategy (OEPMS) [APP-284]**, which set out habitat creation, species protection measures, buffer zones and long-term ecological management. The preparation, approval and implementation of the detailed Landscape and Ecological Management Plan, substantially in accordance with the **OLEMP [APP-283]**, are secured through Requirement 7 in Schedule 2 of the **Draft Development Consent Order [APP-016]**. The preparation, approval and implementation of the detailed Ecological Protection and Mitigation Strategy, substantially in accordance with the O**EPMS [APP-284]**, are secured through Requirement 8 in Schedule 2 of the **Draft Development Consent Order [APP-016]**. These requirements ensure that ecological protection and enhancement measures are delivered and maintained throughout construction and operation of the Scheme. Information on the likely environmental effects of the proposed development is provided in the Environmental Statement (ES) [APP-052 to APP-265], which accompanies the DCO Application. The ES includes topic-specific assessments of the Scheme's likely significant effects during construction, operation and decommissioning, including landscape and visual effects, ecology and biodiversity, cultural heritage, hydrology and flood risk, air quality, noise, traffic and transport, soils and agriculture, climate change and human health. The approach to consultation and the materials made available to the public are set out in the Consultation Report [APP-022]. The

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Consultation Report confirms that environmental information was made available during the statutory consultation and that feedback received informed the ongoing design evolution and assessment of the Scheme. The Applicant considers that the statutory consultation has been robust, thorough and undertaken in accordance with the requirements of the Planning Act 2008, the Environmental Impact Assessment Regulations and the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009, and that the information provided was adequate and informative.

6.83 Christine King

Table 6-83 RR-0787

Reference	Theme	Comments/Issues Raised	Applicant's Response
CK-001	Landscape and Visual	Having family living in this area and as such a regular visitor I want to object strongly to these plans. I believe they are totally out of keeping with this area of outstanding natural beauty with very picturesque villages. It is our duty to protect these areas and their history for future generations to enjoy. This would just be the tip of an iceberg as once this form of industrialisation is introduced it would set the precedent for any kind of industries in this wonderful area which needs to be preserved at all costs. Too much of our beautiful countryside is being sacrificed and lost to future generations.	An assessment of landscape and visual effects is provided in the Landscape and Visual Impact Assessment (LVIA) presented in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**. The LVIA assesses effects on identified landscape and visual receptors, including residential properties and users of public rights of way, and identifies where significant effects may occur. The LVIA found no significant long term visual effects to Residential Properties as a consequence of the Scheme. The scale of development within the Order Limits has been significantly reduced from the layout assessed in the Preliminary Environmental Information Report (PEIR) through an iterative design process undertaken in response to consultation and in accordance with the mitigation hierarchy to avoid, reduce and mitigate adverse effects. As part of this design evolution, panels along the edge of the Cotswolds National Landscape and along the Fosse Way have been removed. Mitigation measures to address landscape and visual effects are set out in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**, Figure 3-4-1 to 3-4-5.2 **Landscape and Ecology Mitigation Plan [APP-084]** and detailed within the **Outline Landscape and Ecological Mitigation Plan (LEMP) [APP-283]** and the **Outline Ecological Protection and Mitigation Strategy (EPMS) [APP-284]**. These documents include proposals for new and enhanced planting, retention of existing hedgerows and woodland, and landscape integration measures to reduce visual effects over time. In addition, the Scheme design incorporates minimum offsets from existing landscape features, including residential properties, ancient woodland, woodland, hedgerows, public rights of way and watercourses, to further limit visual impacts. The preparation, approval and implementation of detailed landscape and ecological management plans, substantially in accordance with the **OLEMP [APP-283]** and **EPMS [APP-284]**,

Reference	Theme	Comments/Issues Raised	Applicant's Response
			are secured through requirements in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that the identified mitigation measures are delivered and maintained throughout the lifetime of the Scheme. The potential effects of the Scheme on cultural heritage, including archaeological assets dated to the Roman and medieval periods, are fully assessed in **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, supported by detailed technical appendices in **ES Volume 3, Appendices 12-1 to 12-7 [APP-219 to APP-231]**. The chapter considers baseline conditions, identifies built and archaeological heritage assets within the study area, and assesses likely effects during construction, operation and decommissioning, including effects on setting. The chapter concluded that, following mitigation, the residual effects on any archaeological assets including Roman and medieval period remains, would be neutral/negligible and therefore not significant (see **Volume 3, Appendix 12-8 Cultural Heritage Impact Assessment Tables [APP-232]**). The assessment is underpinned by extensive desk-based research, geophysical survey and evaluation trenching, as detailed in **ES Volume 3, Appendix 12-2: Archaeological Desk-Based Assessments [APP-220], Appendix 12-4: Archaeological Geophysical Survey Reports [APP-224], and Appendix 12-5: Interim Evaluation Trial Trenching Reports [APP-225]**. The Applicant notes that the approach to the assessment has been agreed with Wiltshire Council and the methodology for the mitigation strategy is under discussion with Wiltshire Council and is set out in the relevant **Statement of Common Ground** to be submitted at Deadline 1. Embedded mitigation measures to avoid or reduce harm to heritage assets are set out in Section 12.9 of **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, with additional mitigation measures detailed in Section 12.11. An overarching archaeological mitigation strategy is provided in **ES Volume 3,**

Reference	Theme	Comments/Issues Raised	Applicant's Response
			Appendix 12-6: Outline Archaeological Mitigation Strategy [APP-230], which sets out the framework for further archaeological investigation, recording and protection where ground disturbance cannot be avoided. The preparation, approval and implementation of detailed archaeological Written Schemes of Investigation, substantially in accordance with the Outline Archaeological Mitigation Strategy, are secured through Requirement 12 of Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that appropriate protection, recording and mitigation are delivered before and during construction. Each application for development consent is required to be considered on its own merits, based on its individual characteristics, environmental effects and compliance with relevant national policy. Any future proposal would be subject to its own site selection process, Environmental Impact Assessment, consultation and examination in accordance with the Planning Act 2008 and the relevant National Policy Statements. The Applicant's Environmental Statement [APP-052 to APP-265] includes an assessment of cumulative effects, which considers the interaction of the Scheme with other existing and reasonably foreseeable developments. This ensures that the potential for incremental or combined effects is transparently assessed and reported.

7 The Applicant's response to a summary of key themes arising from RRs submitted by members of the public

1.1.10 At the time of submitting this document, the Applicant is continuing to consider and respond to all of the published RRs.

1.1.11 The Applicant will submit its responses to the RRs submitted by members of the public and any non-statutory parties not responded to in this document at Procedural Deadline B.

1.1.12 The table below sets out common themes that have arisen from the Applicant's consideration of RRs to date, and the Applicant's response to these themes.

Table 7-1: The Applicant's response to key themes arising from RRs

Summary of issues raised	Applicant's Response
Description and DCO Process	
Respondents expressed an objection to the Scheme.	The Applicant's **Statement of Need [APP-266]** provides evidence that an unprecedented capacity of new low-carbon generation schemes is urgently needed for the UK to meet its legally binding climate change targets. The government has confirmed that solar energy is at the heart of the Clean Power 2030 Mission [NPS EN-3 (2025) Paras 2.10.1 & 2.10.2]. The Statement of Need confirms that the need for the Scheme is urgent and that substantial weight should be given to the need for the Scheme [NPS EN-1 (2023) Para 3.2.9-3.2.10]. The Applicant is confident that the proposed management and mitigation measures set out in the **Environmental Statement (ES) [APP-052 to APP-265]** are comprehensive and robust and that the Scheme aligns with national and local planning policy; this is outlined in the **Planning Statement [APP-267]**. Of particular relevance are Annex A: National Policy Statement Accordance Tables and Annex B: Local Policy Accordance Tables, of the Planning Statement which set out an appraisal of the Scheme against national and local planning policies.

Some respondents expressed general support for the Scheme.	The Applicant notes these comments. The **Environmental Statement (ES) [APP-052 to APP-265]**, **Statement of Need [APP-266]**, and **Planning Statement [APP-267]** provide an assessment of the adverse and beneficial effects associated with the Scheme, an explanation of why the Scheme is needed and the benefits of solar energy generation, and the other benefits proposed by the Scheme.
Some respondents noted that Wiltshire Council has objected to the Scheme.	The Development Consent Order (DCO) process anticipates that differing views may be expressed by consultees, including local authorities, and such representations will be considered by the Examining Authority alongside all other evidence submitted. The Applicant engaged with Wiltshire Council, a host local planning authority, throughout the pre-application process and will continue to do so during Examination. Matters raised by Wiltshire Council have informed the development of the Scheme and the accompanying assessments and are addressed within the application documents. The Applicant will respond in detail to Wiltshire Council's representations through the Examination process, including via the Statements of Common Ground and, where appropriate, at Examination hearings, to assist the Examining Authority in its consideration of the application.
Respondents expressed concern about the decision on the Scheme being taken by the Secretary of State or government rather than Wiltshire Council or local residents.	Lime Down Solar Park has an anticipated generating capacity of approximately 500 MW and therefore exceeds the 100 MW threshold for a Nationally Significant Infrastructure Project (NSIP). As a result, the Scheme is subject to the Planning Act 2008 and must be consented through a Development Consent Order (DCO), examined by the Planning Inspectorate on behalf of the Secretary of State for Energy Security and Net Zero, rather than determined by the local planning authority. A full description of the Scheme is provided in the **ES Volume 1, Chapter 3: The Scheme [APP-055]**.

Respondents expressed general scepticism about the effectiveness of the Scheme's proposed mitigation measures and / or ability to reduce impact to local communities.	The Applicant is confident that the proposed management and mitigation measures set out in the **Environmental Statement [APP-052 to APP-265]** are comprehensive and robust and that the Scheme aligns with national and local planning policy; this is outlined in the **Planning Statement [APP-267].** Of particular relevance are Annex A: National Policy Statement Accordance Tables and Annex B: Local Policy Accordance Tables, of the Planning Statement which set out an appraisal of the Scheme against national and local planning policies. Of particular relevance to the assessment of effects on local communities are **ES Volume 1, Chapter 8: Landscape and Visual [APP-060], Chapter 13: Transport and Access [APP-065], Chapter 14: Noise and Vibration [APP-066], Chapter 15: Air Quality [APP-067], Chapter 16: Socioeconomics, Tourism and Recreation [APP-068], and Chapter 18: Human Health [APP-070]**, all of which consider potential impacts on residential properties and local communities.
Respondents expressed general support for and/or welcome the Scheme's proposed mitigation measures.	The Applicant makes note of these comments and welcomes continued constructive dialogue.
Some respondents expressed concern about whether the specialists carrying out the environmental assessments are fully independent and impartial, and questioned the reliability of the findings. A number of respondents suggested that independent specialists should undertake environmental and ecological surveys.	The Applicant disagrees that the team undertaking the environmental assessments are biased. The **Environmental Statement (ES) [APP-052 to APP-265]** and environmental and ecological surveys have been undertaken by competent experts with considerable experience assessing similar schemes. Details of qualifications, experience and professional institute membership are provided within **ES Volume 3, Appendix 1-1 Statement of Competence [APP-180]**.

Some respondents expressed concerns that the Scheme does not align with, or would not deliver against, its stated design principles.	The Applicant has prepared a **Design Approach Document (DAD) [APP-268]** which explains how the design principles developed for the Scheme (as detailed in Appendix B Design Vision and Principles) have influenced the design of the Scheme and been a key consideration in decisions by the Applicant. The Applicant has dedicated significant resource both internally and through appointment of an experienced team of consultants to develop a high-quality design for the Scheme. The design principles developed for the Scheme were informed by national and local policy, government guidance, and the local context. The design of the Scheme has been Landscape Led, and gives due weight to the intrinsic character and beauty of the surrounding countryside as demonstrated in the DAD which explains that numerous field parcels have been removed or had solar PV panels removed from them as part of the design evolution of the Scheme, to reduce impacts on the setting of the Cotswolds National Landscape, with some parcels being replaced with environmental mitigation and enhancement, to further enhance the value of the Cotswolds National Landscape. These changes have been made in discussion with the Cotswolds National Landscape Board, landscape officers at Wiltshire Council and engagement with other stakeholders. The DAD also explains how the mitigation hierarchy has been a key consideration from the outset of the Scheme design, and that various changes have been made to the Scheme including removal of infrastructure and fields to minimise impacts on heritage.
Respondents expressed general support for the Scheme's design principles.	The Applicant makes note of these comments and welcomes support from these representations.

Some respondents expressed concern that the primary motivation for bringing forward the Scheme is financial profit. A number of respondents also referred to "greenwashing" or questioned the developer's commitment to tackling climate change and supporting Net Zero objectives.	The Applicant notes the concerns about the reasons behind the Scheme. The Applicant's **Statement of Need [APP-266]** provides evidence that the Scheme aims to help meet national targets for clean energy and net zero targets set out in legislation and policy. The aim is to deliver long term environmental benefit alongside a secure energy supply. The Applicant is committed to meeting all planning, environmental, and construction policies and standards. The Scheme is being developed in line with legal and regulatory requirements, with engagement with all statutory and non-statutory bodies, ensuring quality and accountability throughout.
Some respondents expressed general distrust towards the Applicant. Some respondents raised specific concern regarding the involvement of Macquarie.	The Applicant acknowledges the expression of distrust towards the Scheme and has demonstrated the Scheme's compliance with all statutory requirements under the Planning Act 2008 and applicable legislation such as The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017. The Applicant is subject to legally binding Development Consent Order (DCO) requirements. The Planning Act 2008 also contains enforcement provisions regarding compliance with the terms of a DCO. The Applicant has a strong track record of developing Nationally Significant Infrastructure Project (NSIP) scale projects, notably the consented Cottom Solar Project and West Burton Solar Project, alongside a strong pipeline of further applications coming forward. The Applicant confirms that the owners of Island Green Power, Macquarie, has a strong record of long-term UK investment. Since 1999, Macquarie has invested more than £65 billion into UK infrastructure, including energy projects, supporting more than 33,000 UK jobs. **The Funding Statement [APP-019]** in the Application provides details of the corporate structure of Lime Down Solar Park Limited and how the Scheme is being funded.

Some respondents raised concerns about foreign investment in the Scheme and whether profits would be distributed outside the UK. A number of respondents also expressed concerns relating to national security, including the potential involvement of hostile or malicious state actors. Some respondents questioned whether the Applicant would pay appropriate taxes in the UK.	The Applicant, Lime Down Solar Park Limited is a 100% subsidiary of IGP UK Projects Limited. Both are registered in England and Wales and subject to UK tax law and regulations. Investment may come from a range of sources, including international ones. This is common practice with UK infrastructure projects and helps fund the transition to clean energy at the scale required. The Applicant highlights Island Green Power's Cottam and West Burton projects which have received Development Consent Orders (DCOs). The Cottam Solar Project was granted development consent by the Secretary of State on 5 September 2024. The West Burton Solar Project was granted development consent by Secretary of State on 24 January 2025. **Funding Statement [APP-019]** submitted with the DCO application demonstrates that the Scheme is financially viable and adequately funded to deliver the Scheme in full.
Some respondents expressed concern that the Applicant may not fully comply with the requirements of the Development Consent Order (DCO), if granted. In particular, some respondents highlighted concerns about compliance with decommissioning requirements at the end of the Scheme's operational life. A number of respondents also raised concerns that, if ownership of the Scheme were to change in the future, compliance with DCO requirements may not be maintained.	The Applicant confirms that, if consent is granted, it has the capability to build, own, and operate the Scheme. The Applicant may also consider the option to sell or transfer the Scheme to another suitably qualified party. Regardless of any future ownership, the undertaker as defined in the **draft Development Consent Order (DCO) [APP-016]** will remain bound by the legally enforceable requirements of the DCO.

Some respondents expressed general concern about the overall cost of the Scheme and whether sufficient funding has been secured. A number of respondents also questioned whether the Scheme would be cost-effective or financially viable in the long term.	The Applicant acknowledges comments regarding the cost effectiveness and profitability of the Scheme. However, it is important to clarify that Lime Down Solar Park is a privately financed development. All financial risks associated with the construction, operation, and maintenance of the Scheme, including those related to the cable route, are borne entirely by the developer. The commercial viability of the Scheme has been assessed as part of the developer's investment decision, including the length of the cable and associated infrastructure. The **Funding Statement [APP-019]** submitted with the Development Consent Order (DCO) application demonstrates that the Scheme is financially viable and adequately funded to deliver the Scheme in full.
Some respondents expressed concern about the potential use of taxpayer funding or government subsidies in relation to the Scheme.	The Applicant confirms that Lime Down Solar Park is being developed solely through private sector financing and that it has not received, and is not receiving any public money, subsidy or funding in the development of the Scheme.
Some respondents expressed concern about the proposed use of compulsory purchase or compulsory acquisition powers as part of the Scheme.	The Applicant's goal is to deliver Lime Down Solar Park on land where the owner has voluntarily agreed to its use. Meaningful conversations with identified land interests have helped inform the design which in turn assists in avoiding people's land, including homes or gardens. As is standard in Nationally Significant Infrastructure Project (NSIP) solar schemes, the **draft Development Consent Order [APP-016]** includes provision for compulsory acquisition of land and rights, but these are subject to controls and limitations. These powers sought are necessary and proportionate to ensure the deliverability of the Scheme.
Some respondents expressed dissatisfaction with the consultation process undertaken for the Scheme.	The Applicant considers that the statutory consultation has been robust, thorough and undertaken in accordance with the requirements of the Planning Act 2008, the Environmental Impact Assessment (EIA) regulations, and the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009. The **Consultation Report [APP-022]** sets out the Applicant's approach to pre-application consultation. The Applicant also notes that the examination process provides a further opportunity for interested parties to comment on the Scheme. This examination is managed by an independently appointed Examining Authority. Further to this, the Applicant provided an extended relevant representation period beyond the minimum statutory timeframe to allow

	sufficient time for members of the public to review the submitted application documents and register as an interested party. The Applicant acknowledges that any adverse effects from the Scheme are more likely to be felt locally than the largely wider-scale benefits of the Scheme. The Scheme is anticipated to help meet the UK's net zero requirements for energy production, which is considered a critical national priority and set out in National Policy Statements for Energy NPS EN-1 (section 4.2) and EN-3. This therefore will benefit the national population rather than just the local population. The Scheme is also anticipated to benefit the population within approximately 20km of the Scheme, through providing employment and income especially during construction and replacement activities, and providing skills and training opportunities. Where the Scheme is anticipated to benefit local people more specifically, this is done through providing onsite permissive paths to increase access to the countryside, providing improved landscape planting through reinforcing existing hedgerows and planting of new trees, providing biodiversity net gains through habitat improvements. That notwithstanding, the Applicant is committed to providing a Community Benefit Fund to allow for community-driven benefits that are not necessarily associated with the Scheme itself. The purpose is to establish a means to recognise local community needs that the Applicant wants to be able to contribute towards in recognition of the local impact of the Scheme.
Site Selection and Alternatives	
Respondents expressed concern about the scale of the Scheme, with some stating that it is too big.	The Scheme has been designed to deliver the greatest possible benefit from the available land and the available grid connection, whilst avoiding, minimising and/or mitigating harmful environmental effects. As per the description set out in **ES Volume 1, Chapter 3: The Scheme [APP-055]** the total area within the DCO Order Limits encompasses approximately 1,237 hectares (ha). Of this, the 'Solar PV Sites' comprise approximately 749.1 ha of land. Around 479.5 ha of this land is proposed as being required for installation of solar PV, battery storage, and associated infrastructure. The remaining 269.5 ha would provide areas dedicated to ecological mitigation, measurable Biodiversity Net Gain (BNG) delivery, landscaping, offsets and agricultural land managed for environmental enhancement and habitat creation. These mitigation measures are set out in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060], Figure 3-4-1 to 3-4-5.2 Landscape and Ecology Mitigation Plan [APP-084]** and detailed within the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]**. The Cable Route Corridor, which stretches approximately 22 km from 'Lime Down D' to Melksham Substation and links together the Solar PV Sites, covers approximately 463.2 ha. Approximately 17.8 ha (of which 5.9 ha overlap with the Cable Route Corridor) is proposed for Highway Improvement Areas within which improvements to sections of the existing highway

	network will be completed to facilitate access to the Scheme, such as improvements to road edge and traffic management. Work will be undertaken by the Applicant and National Grid within the Existing National Grid Melksham Substation, requiring a total area of 12.8 ha. This is set out in **ES Volume 1, Chapter 3: The Scheme [APP-055]**. The Applicant remains committed to delivering a Scheme that makes a meaningful contribution to the UK's transition to net zero, while also seeking to minimise adverse impacts and maximise opportunities for environmental enhancement and community benefits.
Some respondents expressed concern that the Solar PV Sites are located a considerable distance from the grid connection point at Melksham Substation, and that the proposed cable route is too long. Some respondents suggested that a site closer to Melksham Substation should be selected instead. A number of respondents also referred to the potential for energy losses over the length of the cable route and questioned whether this would affect overall efficiency or cost effectiveness.	The Applicant confirms that the existing National Grid Melksham substation has been identified as the point of connection. This decision was based on available capacity, network resilience, and strategic grid planning. As explained in **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]**, an initial search area was identified at a 5 km radius from the point of connection (POC), however this was later expanded as no suitable and available sites within 5 km were identified. The search area was enlarged incrementally to a 20 km radius which is considered by the Applicant to be a viable cable connection distance for a solar project of this scale. The POC and 20 km search area is shown on Figure 1, Annex C of **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]**. Further, from an operational perspective, high voltage electricity transmission at 400kV in this case, is specifically designed to minimise energy losses over long distances. As such, the approximate 20km distance involved results in negligible losses. More details on how the Cable Route Corridor has been located and designed can be found in **ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP-056]**. Several factors were considered designed to take a direct route whilst following existing features, such as roads, and avoiding sensitive receptors as far as practicable, such as habitat designations, residential and commercial properties, heritage assets, and a large number of land interests. The assessments set out in the various chapters of the **ES [APP-052 to APP-265]** detail what impacts are expected as a result of the Scheme based on the minimum and maximum parameters of the Scheme, and the mitigation and enhancement measures that are proposed to reduce these impacts.

Some respondents expressed concern that the solar areas are too fragmented or spread across a wide area. Some respondents also questioned the need for multiple land parcels within the Scheme.	As set out in **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]**, the Applicant undertook an initial review which did not identify a single site of the appropriate size (1,100 ha) within the area of search. Therefore, the Applicant considered both contiguous land parcels and land parcels near one another. The **Statement of Need [APP-266]** explains at Section 7.4 that NSIP proposals may comprise adjoining or separate parcels of land and that "*the connection of separate parcels of suitable land together into a single scheme may, subject to analysis, enable those parcels of land to connect economically to the electricity system*" which is the case for this scheme. Section 8.2 of the **Statement of Need [APP-266]** explains that by bringing the parcels together into a single scheme, the Scheme is able to carry a connection to the National Electricity Transmission System (NETS), thus providing a local source of low carbon electricity and also enabling the efficient bulk transfer of energy generated at the Scheme so that any surplus can be used to cover shortfalls elsewhere. By connecting to the NETS, the Scheme will not impact the feasibility or timing of distribution network connections for either new generation or consumption connections which among other things are required to support the delivery of Wiltshire County Council's growth plans.
Some respondents expressed general opposition to the Scheme on the basis that they consider it to be in the wrong location.	National Policy Statement EN-3 Paras 2.10.11 and 2.10.18 explain that the availability of grid connection, suitable irradiance levels, and local topography are key inputs to the selection of sites suitable for large-scale solar generation developments. The number of locations within the UK at which large-scale solar generation is suitable is therefore likely to be limited, and this is a material issue when considering how the UK is to meet the urgent need for low carbon generation as is set out in the NPSs. This point is expanded upon in the **Statement of Need [APP-266]** in particular in Section 4.3. Chapter 8 of the **Statement of Need [APP-266]** provides evidence to support the suitability of the proposed location of the Scheme for large-scale solar plus storage in relation to the timeliness and availability of the grid connection, transmission system operability and the decarbonisation and energy security benefits the Scheme will bring forward from this location. As set out in **ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP-056]** and the Site Selection Assessment Report at **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]** an appraisal of alternative sites within a 20km radius of the Existing National Grid Melksham Substation has been undertaken, which concludes that there are no more suitable locations within the 20km search area than the proposed location for the Scheme.

Some respondents raised general concerns about the site selection process and the suitability of the sites chosen for the Scheme.	Site selection is addressed in **ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP-056]** and **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]**. Paragraph 2.10.31: *"…at this scale, it is likely that applicant's developments will use some agricultural land. Applicants should explain their choice of site, noting the preference for development to be on suitable brownfield, industrial and low and medium grade agricultural land".* **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]** explains how brownfield land, industrial land, previously developed land, and low-grade agricultural land were considered, policy. As set out in **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]** the Applicant reviewed brownfield land registers for local authorities within the area of search including Wiltshire Council, South Gloucestershire Council, Bath and Northeast Somerset Council, and Somerset Council. The assessment concluded that there were no sites within the search area of sufficient size to accommodate a large-scale solar development, either individually or cumulatively. The sites assessed were too small to support the proposed Scheme and were largely allocated for housing or mixed-use development, in line with local planning policies, thereby creating a conflict with the intended use for renewable energy infrastructure. Therefore, it was concluded that there was no available or suitable brownfield land for the purposes of the Scheme.

Some respondents expressed scepticism that other suitable sites had not been properly considered. Some respondents also expressed dissatisfaction that alternative sites were not subject to consultation.	There is no general requirement in NPS EN-1 to consider alternatives or establish that the proposed Scheme represents the best option from a policy perspective. Although there is no general planning policy requirement to consider alternatives and show the proposals represent the best option, the requirement to describe the alternatives considered by the Applicant is required by the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 and in specific circumstances as set out in NPS EN-1. The Applicant followed a staged approach to assessment, taking into consideration a range of planning, environmental and operational factors. **ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP-056]** and **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]** explains the methodology that has been applied when identifying and evaluating potential sites for the Scheme. It identifies a number of potential development areas for the Scheme and presents how each of those areas perform against a range of planning, environmental and operational constraints and opportunities. This report concludes that there are no more suitable and available locations within the search area than the proposed location for the Scheme, based on the criteria identified. Further, as described in the **Statement of Need [APP-266]**, in particular in Section 2.9, the government is seeking a large capacity of new low carbon schemes to come forwards to prioritise projects needed for 2030, while maintaining a robust pipeline of projects beyond 2030 towards meeting net zero by 2050. The urgent and unprecedented requirement for new large scale solar schemes supports the view that any other suitable and available sites, if such sites had been found, would likely also be needed.
Some respondents expressed concern that the site was selected primarily on a commercial basis, particularly through identifying landowners willing to make land available, rather than on wider planning, environmental or technical considerations.	As detailed in **ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP-056]** and **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]**, the Applicant has followed a staged approach to assessment, taking into consideration a range of planning, environmental and operational factors. Potentially willing landowners with large scale land holdings within the search area was a consideration, however it is not the only consideration in the site selection process.
Some respondents expressed general concern or opposition regarding the proposed location of the Battery Energy Storage System (BESS).	The location of the BESS was determined through an options appraisal and iterative design process, having regard to technical requirements, environmental constraints and potential effects on nearby receptors. The BESS Area is located at Lime Down D, close to the Solar PV Sites and the on-site substation, which provides operational and efficiency benefits, including minimising transmission losses, maximising storage efficiency, supporting grid balancing, and enabling a rapid and reliable response to network fluctuations. Among the options considered for co-locating the BESS with the Solar PV Sites, Lime Down D was identified as the preferred location due to its central position within the Scheme, the

	presence of existing and proposed screening, its limited proximity to many residential properties, and its relationship with existing infrastructure, including the adjacent railway line. The various chapters of the **Environmental Statement (ES) [APP-052 to APP-265]** assess the likely significant effects arising from the BESS at this location and identify mitigation measures where necessary. Overall, the assessment concludes that the siting of the BESS at Lime Down D presents the lowest potential for significant adverse effects when compared with reasonable alternatives. Further detail on the consideration of alternatives, the design evolution of the Scheme and the assessment of potential effects is provided in **ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP-056]**, which sets out the iterative process undertaken to identify the preferred location and layout for the Scheme, including the BESS Area in Section 4.7.
Some respondents expressed general concern regarding the proposed location of the cable route.	Details on how the design of the Cable Route Corridor has evolved and been designed can be found in **ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP-056]**. Several factors were considered designed to take a direct route whilst following existing features, such as roads, and avoiding sensitive receptors as far as practicable, such as habitat designations, residential and commercial properties, heritage assets, and a large number of land interests. The assessments set out in the various chapters of the **Environmental Statement (ES) [APP-052 to APP-265]** detail what impacts are expected as a result of the Scheme based on the minimum and maximum parameters of the Scheme, and the mitigation and enhancement measures that are proposed to reduce these impacts.
Construction and Decommissioning	

Some respondents raised ethical concerns about solar panels being procured from China or other overseas countries, including whether panels would be responsibly sourced. A number of respondents also expressed concern about the potential for modern slavery within the supply chain. Some respondents further raised environmental concerns relating to the importation of panels from overseas, including the associated carbon footprint.	Island Green Power is part of the Solar Energy UK Supply Chain Commitment, which binds the Applicant to ensuring that its supply chains are free of slavery. As part of this, the solar sector in the UK and Europe has launched the Solar Stewardship Initiative (SSI), which independently inspects and certifies individual factories for sustainable and ethical practices. The Applicant expects to source its panels from factories within countries that are SSI-accredited. The effects of emissions generated from embodied carbon within products including importation from panels sourced overseas to be used on site (as well as construction, operation and decommissioning emissions) are all considered in **ES Volume 1, Chapter 7: Climate Change [APP-059]**. The CO2e figures are included in detail within the ES chapter. The chapter concludes that the emissions from these sources would be outweighed by the reduced emissions as a result of the Scheme contributing to decarbonisation of energy from the National Grid.
Some respondents expressed general concern about potential disruption during the construction phase of the Scheme.	The likely significant effects of the Scheme during the construction phase are assessed throughout the **ES [APP-052 to APP-265]**, including effects on traffic and transport, noise and vibration, air quality, landscape and visual amenity, ecology, and local communities. As part of the assessment, appropriate mitigation measures have been developed and are incorporated into the Scheme. Measures to limit disruption during construction are secured in the **Outline Construction Environmental Management Plan (CEMP) [APP-277]**. Requirement 13 in Schedule 2 to the **Draft DCO [APP-016]** secures that a CEMP must be submitted to and approved by the relevant planning authority, and that CEMP must be substantially in accordance with the **Outline CEMP [APP-277].** All construction works must be carried out in accordance with the approved CEMP.
Respondents expressed concerns about the construction of the cable route. In particular, some respondents raised questions about the proposed width and depth of the cable trench.	The construction of the cable route has been assessed throughout the **Environmental Statement (ES) [APP-052 to APP-265]**, which considers the effects associated with these works. The ES assesses the cable route within defined parameters, including limits on working width and trench dimensions (as identified within **ES Volume 1 Chapter 3 The Scheme [APP-055]** to ensure that a reasonable worst-case scenario is assessed. The detailed design and construction of the cable route will be undertaken within the parameters (including in relation to width and depth of the cable trench) assessed and

	authorised by the DCO. Measures to manage and minimise construction effects, including reinstatement of land following installation, are set out in the **Outline Construction Environmental Management Plan (CEMP) [APP-277]**. Requirement 13 in Schedule 2 to the **Draft DCO [APP-016]** secures that prior to construction, a CEMP must be submitted to and approved by the relevant planning authority, and that CEMP must be substantially in accordance with the **Outline CEMP [APP-277].** All construction works will be carried out in accordance with the approved CEMP.
Some respondents expressed general concern about the operation and maintenance phase of the Scheme, including how it would be managed over its lifetime.	The operation and maintenance of the Scheme have been assessed throughout the **Environmental Statement (ES) [APP-052 to APP-265]** which considers operational effects across relevant topic areas. As part of the assessment, appropriate mitigation measures are incorporated into the Scheme and secured through the DCO and associated management plans. The framework for managing environmental effects during the operational phase is set out in the **Outline Operational Environmental Management Plan (OEMP) [APP-278]** which identifies how commitments made in the **ES [APP-052 to APP-265]** will be implemented during operation and maintenance, including control of lighting, operational traffic, noise, air quality, landscape and ecological management, soil protection, water management and community liaison. It also sets out monitoring and reporting arrangements to ensure mitigation measures remain effective throughout the operational life of the Scheme. The detailed Operational Environmental Management Plan will be prepared substantially in accordance with the **Outline OEMP [APP-278]** and must be submitted to and approved by the relevant local planning authority prior to the commencement of operation. This requirement is secured through Requirement 14 of the **Draft Development Consent Order [APP-016]**.

Some respondents expressed general concern about potential disruption during the decommissioning phase of the Scheme. A number of respondents also requested further information about decommissioning, stating that insufficient detail had been provided.	The decommissioning of the Scheme has been assessed within the **Environmental Statement (ES) [APP-052 to APP-265]** which considers the effects associated with decommissioning activities. As part of the assessment, appropriate mitigation measures are incorporated into the Scheme. Information on decommissioning activities is provided within the **ES [APP-052 to APP-265]** and within the **Outline Decommissioning Strategy [APP-279]**. The information is provided in accordance with the requirements of Part 1 of Schedule 4 of the EIA Regulations 2017 (as amended). Schedule 4 of the EIA Regulations 2017 (as amended) set out the information for inclusion in an ES. **ES Volume 1, Chapter 1: Introduction [APP-053]** Table 1-2 identifies where the requirements of Schedule 4 of the EIA Regulations 2017 (as amended) have been addressed. At the end of the Scheme's operational life, all Solar PV Sites would be decommissioned and the land restored to its original use and condition as far as practicable. There will be opportunities for the retention of a range of biodiversity improvements, including established habitats, hedgerows and woodland, beyond the decommissioning of the Scheme, ultimately enhancing the ecological value of the area. Measures to manage and minimise disruption during decommissioning are set out in the **Outline Decommissioning Strategy [APP-279]**. This explains how mitigation measures identified in the **ES [APP-052 to APP-265]** will be implemented during decommissioning and includes controls for working hours, noise, lighting, traffic management, pollution prevention, waste management and community liaison. The **Outline Decommissioning Strategy [APP-279]** also confirms that decommissioning activities will be undertaken in phases over an anticipated 12–24-month period, with measures to coordinate traffic movements, control noise and vibration in accordance with best practicable means and manage temporary lighting to minimise effects on nearby receptors. A detailed Decommissioning Strategy will be prepared substantially in accordance with the **Outline Decommissioning Strategy [APP-279]** and must be submitted to and approved by the relevant local planning authority prior to the commencement of decommissioning. This is secured through Requirement 20 in Schedule 2 of the **Draft Development Consent Order [APP-016]**. The land will be returned to the landowner as quickly as is practicable after decommissioning.

Some respondents expressed scepticism that the land would be returned to its original use, including agricultural use, following decommissioning of the Scheme. Some respondents suggested that this concern is heightened by the potential for the Scheme to change ownership before the decommissioning phase. Some respondents also stated that the land should not be classified as brownfield following decommissioning.	The effects of decommissioning on soils and agricultural land are assessed in **ES Volume 1, Chapter 17 Soils and Agriculture [APP-069]**. As stated in this chapter, as well as in Section 2 of the **Outline Decommissioning Strategy [APP-279]** which is secured under Schedule 2, Requirement 20 of the **Draft Development Consent Order (DCO) [APP-016]**, all land will be returned to its original use and condition as far as practicable and returned to the landowner. Should the Scheme change ownership before the decommissioning phase, any new owner remains bound by the commitments and obligations set out within the DCO and associated management plans. The effect on agricultural land quality at decommissioning would be influenced by the extent of disturbance caused by the removal of the Solar PV Panels, for example the presence and dimensions of leftover voids or the depth of the remaining underground cables. Currently, the most environmentally acceptable option is to leave the cables in-situ, although the cables could be removed by excavating at regular intervals and pulling the cable through to the extraction point, thus avoiding the need to excavate the entire cable trench. In either case, the disturbance to the land and soil would be less than that likely to occur during the construction phase. Built aspects of the Scheme such as the BESS Area and substations are also subject to the proposal to return the land to its original use and condition, which is primarily agricultural land of Subgrade 3b quality, with some Subgrade 3a at the BESS Area. Measures to manage decommissioning and reinstatement are set out in the **Outline Decommissioning Strategy [APP-279]**, which has been submitted as part of the DCO Application. The Decommissioning Strategy will include robust methodologies and control points to avoid contamination of the underlying land with physical or chemical contaminants and will be applied in conjunction with the Soil Resources Management Plan (SRMP) in order to promote successful reinstatement. A detailed Decommissioning Strategy will be prepared substantially in accordance with the **Outline Decommissioning Strategy [APP-279]** and must be submitted to and approved by the relevant local planning authority prior to the commencement of decommissioning. This is secured through Requirement 20 in Schedule 2 of the **Draft DCO [APP-016]**. In addition, the Applicant is seeking a time-limited consent for the Scheme to have an operational period of 60 years, with decommissioning to take place following cessation of operation. This is secured by Requirement 20 in Schedule 2 of the **Draft DCO [APP-016]**. The Applicant confirms that none of the land will be considered brownfield after decommissioning. The expectation is that the land will return to farming, but the Applicant

	cannot dictate what will happen to the land post-decommissioning when the Applicant no longer has an interest in the land.
Some respondents expressed general support for the restoration of the land to its original use following decommissioning. Some respondents also emphasised that the land should be returned to its original condition, including agricultural use where applicable.	The Applicant recognises the importance of restoring the land following decommissioning and is committed to ensuring that appropriate measures are secured to achieve this. The Applicant welcomes the support received in this regard. At the end of the Scheme's operational life, all Solar PV Sites would be decommissioned and the land restored to its original use and condition as far as practicable. There will be opportunities for the retention of a range of biodiversity improvements, including established habitats, hedgerows and woodland, beyond the decommissioning of the Scheme, ultimately enhancing the ecological value of the area. Measures to manage decommissioning and reinstatement are set out in the **Outline Decommissioning Strategy [APP-279]**, which has been submitted as part of the DCO Application. The Decommissioning Strategy will include robust methodologies and control points to avoid contamination of the underlying land with physical or chemical contaminants and will be applied in conjunction with the Soil Resources Management Plan (SRMP) in order to promote successful reinstatement. A detailed Decommissioning Strategy will be prepared substantially in accordance with the **Outline Decommissioning Strategy [APP-279]** and must be submitted to and approved by the relevant local planning authority prior to the commencement of decommissioning. This is secured through Requirement 20 in Schedule 2 of the **Draft Development Consent Order [APP-016]**. In addition, the Applicant is seeking a time-limited consent for the Scheme to have an operational period of 60 years, with decommissioning to take place following cessation of operation. This is secured by Requirement 20 in Schedule 2 of the **Draft DCO [APP-016]**.
Some respondents requested further information about how decommissioning of the Scheme would be funded and who would be responsible for delivering it. Some respondents asked whether funds would be set aside to cover decommissioning costs in the event that the Applicant were to become insolvent.	A requirement to decommission the Scheme is part of the Development Consent Order (DCO); failing to comply with that requirement would be a criminal offence. The requirement to decommission the Scheme would sit with the owner at the time of decommissioning. Failing to comply with Requirement 20 would be a criminal offence. Decommissioning is also covered in agreements with landowners, which includes decommissioning securities to cover the cost of decommissioning in the event of any breach by the Applicant or in the event of the insolvency of the Applicant. The amount of such decommissioning security is regularly re-valued throughout the lifecycle of the Scheme and topped up if necessary.

A number of respondents also expressed concern that the cost of decommissioning could fall to taxpayers.	Decommissioning is secured through Requirement 20 in Schedule 2 of the **Draft Development Consent Order [APP-016]**. As set out in the **Funding Statement [APP-019]** submitted with the DCO Application, the Applicant is committed to ensuring that appropriate financial provisions are in place to cover decommissioning costs at the end of the operational life of the Scheme.
Some respondents expressed scepticism that solar panels and other components of the Scheme would be appropriately recycled at the end of their operational life.	The **Outline Operational Environmental Management Plan (OEMP) [APP-278]**, secured by Schedule 2, Requirement 14 of the **Draft Development Consent Order (DCO) [APP-016]**, sets out the commitment of the Applicant to maximise recycling and reuse of Scheme components at the end of their life. Section 4 of **ES Volume 1, Chapter 20: Other Environmental Matters [APP-072]** sets out that, due to the market and policy trends, it is assumed that specialist regional or national facilities would be in place at the time of component replacement (e.g. solar panels and batteries and decommissioning), and these would be developed in response to demand generated by the UK-wide solar PV panel industry and would be reused, recycled, or recovered and not disposed of to landfill. Details of how the panels and Battery Energy Storage System (BESS) will be disposed of are provided within Section 4 of **ES Volume 1, Chapter 20: Other Environmental Matters [APP-072]**, which states that recycling routes are generally available for component replacement waste at present, and it is likely that there will be even greater opportunities for recycling in the future, not least because the recycling market will have expanded to meet demand as solar PV installations increase.
Climate Change and Energy Need	
Some respondents expressed scepticism about climate change and questioned the scientific basis for climate policy and associated targets.	Climate change is recognised globally as a serious environmental threat by recognised experts. The methods used in the assessment of climate change in **ES Volume 1, Chapter 7: Climate Change [APP-059]** are standard methods for quantification of the effects of Climate Change based on information from UK government's Department for Security, Energy and Net Zero and applicable guidance such as the Institute of Environmental Management and Assessment.

Some respondents expressed concern about the environmental effects associated with the manufacture of components used in the Scheme.	The effects of emissions generated from embodied carbon within products to be used on site, as well as construction, operation and decommissioning emissions, are assessed in **ES Volume 1, Chapter 7: Climate Change [APP-059]**. The CO_2e figures are included in detail within this ES chapter. Emissions from production of the required cables are included within the assessment. The chapter concludes that the emissions from these sources would be outweighed by the reduced emissions resulting from the Scheme contributing to decarbonisation of energy from the National Grid. Further, as outlined in the chapter, the emissions of replacing the solar panels, inclusive of the embodied carbon (manufacturing and transportation emissions), are considered in the assessment. The DESNZ conversion factors used for the assessment of embodied carbon cover the extraction, primary processing, manufacture and transportation of materials. Baseline and future conditions are set out in Section 7.7 of the assessment. Although it is expected there will be some baseline emissions from the Site's current use and some carbon sequestration from the grassland once the Scheme is in place, as a conservative approach the baseline emissions and the grassland sequestration were considered zero.

Some respondents expressed concern about the environmental impacts associated with the extraction and use of rare earth elements and other critical minerals required for the Scheme.	**ES Volume 1, Chapter 7: Climate Change [APP-059]** assesses the greenhouse gas (GHG) emissions associated with the full life cycle of the Scheme, including the manufacture, transport, installation, operation, maintenance and decommissioning of Scheme components such as solar PV panels, inverters, transformers and battery storage infrastructure. This includes consideration of embodied carbon arising from the production of rare earth materials and components, which reflects the upstream environmental impacts associated with their manufacture. The assessment recognises that the manufacture and transport of solar PV panels and batteries represent a notable proportion of the Scheme's lifecycle GHG emissions. These impacts are considered within the context of national carbon budgets and the UK's transition to net zero, with the assessment concluding that the Scheme would make a meaningful contribution to reducing greenhouse gas emissions over its operational lifetime when compared to a 'without Scheme' scenario. In addition, **ES Volume 1, Chapter 20: Other Environmental Matters [APP-072]** considers the use of materials and natural resources, including minerals, materials supply. This chapter confirms that the Scheme would not give rise to significant effects in relation to minerals, materials or waste, and that embedded mitigation measures and good practice would be applied throughout the construction, operation. The ES also identifies embedded mitigation measures across the Scheme, including the use of durable components with long operational lifespans, allowances for replacement over time, and the recyclability of key components such as solar panels, batteries and electrical equipment. These measures reduce the need for ongoing extraction of virgin materials and limit long-term environmental impacts.
Some respondents expressed concern that the Scheme would cause greater environmental harm than environmental benefit, including suggestions that it	**ES Volume 1, Chapter 7: Climate Change [APP-059]** assesses greenhouse gas (GHG) emissions across the full life cycle of the Scheme, including the manufacture, transport, installation, operation, maintenance and decommissioning of Scheme components. This assessment includes embodied carbon associated with materials and components, as well as operational emissions savings arising from renewable electricity generation.

could result in higher carbon emissions than it would save. Some respondents also expressed scepticism about whether the Scheme should be described as 'green'.	The assessment concludes that, while emissions are associated with the manufacture and construction of the Scheme, these are outweighed over time by the carbon savings achieved through the displacement of fossil fuel-derived electricity generation. When considered over its operational lifetime, the Scheme would result in a net reduction in GHG emissions compared to a 'without Scheme' scenario and would make a meaningful contribution to the UK's legally binding carbon budgets and transition to net zero.
Some respondents expressed concern that the Scheme could alter local weather patterns or contribute to a localised heat island effect.	Evidence from published research indicates that large-scale solar arrays do not give rise to significant or widespread heat island effects. An 18-month study by Fthenakis and Yu (2013) found that solar arrays are typically fully cooled during night-time hours, meaning that sustained heat retention and associated heat island effects are unlikely to occur. Further research by Barron-Gafford et al. (2016) concluded that any temperature increases associated with solar PV installations are localised and do not extend beyond the immediate boundary of the solar farm. As such, any microclimatic effects are limited in extent and rapidly dissipate with distance from the panels. On this basis, the microclimate and heat island effects associated with the Scheme are not considered to be significant, and no meaningful thermal stress, discomfort or change in local weather conditions is anticipated for nearby residents or surrounding land uses.
Some respondents expressed the view that Wiltshire is already making a sufficient contribution towards reducing carbon emissions and generating renewable electricity.	The Applicant notes this comment and recognises the commitment of Wiltshire residents to addressing climate change and supporting renewable electricity generation. The Scheme would build on this existing progress by making a further contribution to renewable energy generation and carbon emissions reduction at both a local and national level.
Some respondents expressed general support for renewable energy, including solar power, with some indicating that they are not opposed to ground-mounted solar in principle.	The Applicant welcomes these comments recognising the importance of renewable energy and the role it can play in supporting the transition to a low-carbon energy system.

Some respondents questioned or doubted the need for the Scheme.	The **Statement of Need [APP-266]** describes that there is an urgent and unprecedented need for new low carbon generation in the UK to meet our climate change, energy security and affordability targets. Further, the Government considers that a secure, reliable, affordable, net zero consistent system in 2050 is likely to be composed predominantly of wind and solar (NPS EN-1, Para 3.3.20). Further, Section 2.9 of the **Statement of Need [APP-266]** describes that the government is seeking a large capacity of new low carbon schemes to come forwards to prioritise projects needed for 2030, while maintaining a robust pipeline of projects beyond 2030 towards meeting net zero by 2050. The Scheme has received notification that, as part of NESO's connection queue reprioritisation process, the solar component of the scheme has been re-prioritised as a Gate 2 Phase 1 connection (i.e. connecting in 2030 or earlier) and that the BESS component of the Scheme has been re-prioritised as a Gate 1 connection. The indicative connection date of the BESS has not yet been confirmed. National Policy Statement EN-1 also states that the Secretary of State should assess all applications for development consent for the types of infrastructure included by the NPS (including solar) on the basis that there is demonstrated urgent need for them, that substantial weight should be given to this need, and that the Secretary of State is not required to consider the specific contribution of any individual project to be satisfied that need is established (EN-1 Paras 3.2.6 - 3.2.8). This representation goes to the merits of the NPS, and to have regard to it would be directly in contradiction of NPS EN-1 (in particular the paragraphs cited above that make clear that the need is established and that there is no requirement to consider the contribution of individual projects). The determination of the Applicant's DCO Application is not the means by which to challenge the provisions of the NPS, and it is for this reason that the ExA and SoS are able to disregard this representation and any similar others, pursuant to sections 87, 94 and 106 of the Planning Act 2008 during the examination of the Application and when determining the Application.

Some respondents expressed concern that electricity generated by the Scheme would not be used locally, including within Wiltshire. Some respondents suggested that the electricity should be supplied directly to local households. A number of respondents also expressed concern that electricity generated by the Scheme could be used outside the UK.	Section 7.2 of the **Statement of Need [APP-266]** explains that the Scheme will connect to the National Electricity Transmission System (NETS) at Melksham. By connecting to the NETS, generation from the Scheme will be transmitted efficiently to both local consumers and across the country where it is required. This is a key benefit of the Scheme and helps the UK's electricity system operate efficiently. This is a benefit to all consumers, including local consumers, who, through their energy bills, pay for the operational costs of the UK's electricity networks. Interconnectors flow electricity between countries and are used to balance supply and demand. Government is supportive of increased interconnection for the economic and security of supply benefits they can bring. National Policy Statement for Energy (EN-1, paragraph 3.3.32) recognises that interconnection between national borders has an essential role in delivering a secure, low carbon electricity system at low cost.
Some respondents supported or acknowledged the Scheme's potential contribution to UK energy security.	The Applicant welcomes the support expressed and agrees that the Scheme would make a positive contribution.
Some respondents expressed the view that solar PV cells and solar panels are inefficient. Some respondents suggested that the UK is not a suitable location for solar generation due to limited sunlight and frequent cloud cover. A number of respondents also described solar energy as unreliable because generation depends on levels of sunlight.	Solar energy is at the heart of the Clean Power 2030 Mission (January 2026 revised NPS EN-3, Para 2.10.2) and it is the Government's view that a secure, reliable, affordable, net zero consistent system in 2050 is likely to be composed predominantly of wind and solar (NPS EN-1, Para 3.3.20). Sunlight, the input energy source for solar, is abundant, predictable, renewable, low carbon and free. Figure 16 of the **Statement of Need [APP-266]** and related text (Section 7.4) demonstrates that there are many viable areas of solar irradiation in the UK. Figures 28 and 29 of the Statement of Need and related text (Section 8.5) demonstrate that a multi-technology approach to electricity supply, including solar, can reduce the effects of weather variability on output and is capable of closely matching a future projection of national electricity demand on a month-average level. The inclusion of a Battery Energy Storage System as part of the Scheme will enable energy generated by the Scheme to be stored and exported to the grid when it is needed, which will provide flexibility and improve grid reliability. Finally, that other countries may experience higher solar irradiation levels than the UK, means that they too could pursue solar generation to support their climate change plans. However, any such statistic cannot be used to demonstrate that solar in the UK does not work or should not be pursued. Government policy is clear that solar should be pursued in the UK with urgency because of the significant benefits it will bring to the UK energy system, consumers and to help meet UK clean power targets.

Some respondents expressed the view that solar panels are outdated or may soon be superseded by more efficient technologies.	Solar PV is a well-established and widely deployed form of renewable electricity generation that is capable of delivering reliable, large-scale low-carbon power over the lifetime of the Scheme. While technological efficiencies are expected to continue to improve over time, this does not reduce the effectiveness of solar PV as a means of reducing greenhouse gas emissions either now or in the future. The Scheme has been designed to allow for the replacement and upgrading of components during its operational life, enabling the use of more efficient technology as it becomes available, within the parameters assessed. This approach ensures that the Scheme remains effective and adaptable while continuing to deliver meaningful carbon savings.

Some respondents expressed a preference for alternative forms of energy generation, including other renewable technologies or non-renewable sources, with some identifying specific options they would favour.	Chapter 6 of the **Statement of Need [APP-266]** provides an analysis of many different low carbon generation technologies which are being developed as part of the UK's fight against climate change. The Statement of Need concludes, in Section 6.12, that a large capacity of many low carbon technologies is required to meet the Government's energy objectives. While the need for unprecedented capacity growth is urgent, some technologies (e.g. nuclear, SMRs, tidal) are either unproven at scale, unconsented, unfunded or have long development timescales (and therefore do not meet the urgent need identified in EN-1 Para 3.1.1 and following). These technologies and indeed other technologies may not be suitable to connect to Melksham substation and therefore would not support the need to use existing and available infrastructure to minimise the cost and timescales associated with connecting to the grid, the large capacities of low carbon generation needed to meet net zero. Section 7.7 of the Statement of Need compares the annual energy generated per square kilometre from solar, from onshore wind and from crop-to-energy (biofuels) technology. The analysis shows that large-scale ground-mount solar schemes which maximise their annual output, are likely to produce a greater quantity of low carbon electricity per acre than the output from a crop-to-biogas application; and that the energy production from land under solar is of a similar order of magnitude to the energy production from land under onshore wind, while the environmental effects of solar schemes may be significantly lower. The Applicant therefore agrees that other low carbon technologies are urgently needed in the UK to meet the UK's climate legal targets; however, none of those technologies are more suitable at the proposed location than the Scheme, and none listed in this Representation are viable alternatives to the Scheme, because they will all be needed too.
Landscape and Visual	

Some respondents expressed general concern about the visual impact of the Scheme. Some respondents also raised concerns about potential effects on private views and views from nearby properties.	An assessment of landscape and visual effects are presented in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**. The Landscape and Visual Impact Assessment (LVIA) assesses effects on identified landscape and visual receptors, including residential properties, users of public rights of way and roads, and identifies where significant effects may occur. The LVIA found no significant long term visual effects to residential properties as a consequence of the Scheme. The visual effects of the Scheme are summarised in **ES Volume 3, Appendix 8-3-3 [APP-192]**. Temporary Major/Moderate and Moderate Adverse effects on visual receptors have been recorded across the Scheme during construction and at Year 1. However, for the majority of these receptors, the effects reduce to non –significant levels as a result of the embedded mitigation measures which are set out in Section 8.9 of **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]** and include landscape buffers, retention of existing hedgerows and woodland, and new planting to provide screening and integration over time. The assessment also identifies that there would be some long-term significant effects on the visual amenity of users of some localised footpaths, as a result of the Scheme. This predominantly relates to locations where footpaths diagonally cross fields and mitigation planting would be inappropriate to landscape character and the legacy landscape. Those receptors which would experience Significant Long Term Visual Effects are listed in Table 8-30 of the **LVIA [APP-060].** The scale of development within the Order Limits has been significantly reduced from the layout assessed in the Preliminary Environmental Information Report (PEIR) through an iterative design process undertaken in response to consultation and in accordance with the mitigation hierarchy to avoid, reduce and mitigate adverse effects. As part of this design evolution, panels along the edge of the Cotswolds National Landscape and along the Fosse Way have been removed. Mitigation measures to address landscape and visual effects are set out in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**, **Figure 3-4-1 to 3-4-5.2 Landscape and Ecology Mitigation Plan [APP-084]** and secured within the **Outline Landscape and Ecological Management Plan (LEMP) [APP-283]** and the **Outline Ecological Protection and Mitigation Strategy (EPMS) [APP-284]**. These documents include proposals for new and enhanced planting, retention of existing hedgerows and woodland, and landscape integration measures to reduce visual effects over time. In addition, the Scheme design incorporates minimum offsets from existing landscape features, including residential properties, ancient woodland, woodland, hedgerows, public rights of way and watercourses, to further limit visual impacts. Although these measures reduce the effects of

	the Scheme on nearly all receptors, as noted above there are 10 receptors which would experience Significant Visual Effects for the duration of the Scheme as set out Table 8-30 of the **LVIA [APP-060]**. Mitigation measures to address landscape and visual effects are set out in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**, **Figure 3-4-1 to 3-4-5.2 Landscape and Ecology Mitigation Plan [APP-084]**. The preparation, approval and implementation of detailed landscape and ecological management plans, substantially in accordance with the **OLEMP [APP-283]** and **EPMS [APP-284]**, are secured through requirements in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that the identified mitigation measures are delivered and maintained throughout the lifetime of the Scheme.

Some respondents raised specific concerns about the visual impact of the proposed Battery Energy Storage System (BESS).	The potential visual effects associated with the proposed Battery Energy Storage System (BESS) have been assessed as part of the Landscape and Visual Impact Assessment (LVIA) in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**. This assessment identifies where visual changes may occur, evaluates the sensitivity of receptors, and considers the magnitude of change resulting from the Scheme. The LVIA assesses the likely significant effects of the Scheme, including the BESS, during construction, operation and decommissioning on identified landscape and visual receptors. This includes residential properties, users of public rights of way and transport receptors. The assessment considers the sensitivity of receptors, the magnitude of change and the resulting significance of effect. The BESS has been assessed as part of the worst-case parameters for above-ground infrastructure, including through Zone of Theoretical Visibility analysis and representative viewpoints agreed through consultation with Wiltshire Council and the Cotswolds National Landscape Board. Photomontages **[APP-103 – APP-105]** have been prepared where significant effects were anticipated to assist in understanding how the BESS and other infrastructure would appear in the landscape. Through the iterative design process, the layout and positioning of infrastructure, including the BESS, has been refined to reduce visual influence. Embedded mitigation measures are set out in Section 8.9 of **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]** and include landscape buffers, retention of existing hedgerows and woodland, and new planting to provide screening and integration over time. These measures are secured via DCO Requirement 5 Detailed Design Approval and Requirement 7 Landscape and Ecological Management Plan. The LVIA identifies where significant visual effects would occur and reports residual effects following mitigation. It concludes that visual effects associated with the Scheme, including the BESS, are localised and would reduce over time as mitigation planting establishes.

Some respondents expressed concern about the proposed height of the solar panels, stating that they consider the panels to be too tall. Some respondents specifically referred to a height of 4.5 metres as being excessive.	The height of the solar PV panels has been assessed using clearly defined design parameters, including a maximum height of 4.5 metres above ground level at maximum tilt, as set out in **ES Volume 1, Chapter 3: The Scheme [APP-055]**. These parameters represent a realistic worst-case scenario for the purposes of the Environmental Impact Assessment. Mitigation measures to address landscape and visual effects, including measures that reduce the perceived height and prominence of panels in views, are set out in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060], Figure 3-4-1 to 3-4-5.2 Landscape and Ecology Mitigation Plan [APP-084]** and secured within the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]**. These include new and enhanced planting, retention of existing hedgerows and woodland, and landscape integration measures to reduce visual effects over time. The Landscape and Visual Impact Assessment (LVIA) set out in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]** assesses the effectiveness of the mitigation measures over time and concludes that, in the majority of locations, where significant adverse visual effects are recorded, the visual effects would reduce to non-significant as mitigation planting establishes and matures. This demonstrates that the proposed mitigation is effective in reducing the visual effects of the Scheme. On this basis, a maximum panel height of 4.5m is not considered excessive. The preparation, approval and implementation of the detailed Landscape and Ecological Management Plan, substantially in accordance with the **OLEMP [APP-283]**, are secured through Requirement 7 in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that the identified mitigation measures are delivered and maintained throughout the lifetime of the Scheme.

Some respondents expressed general scepticism about the effectiveness of the proposed visual mitigation measures. Some respondents stated that they consider no amount of visual mitigation would be sufficient to address their concerns.	The Scheme design has been informed by an iterative design process and incorporates a comprehensive package of embedded mitigation measures to avoid, reduce and mitigate landscape and visual effects. These measures include sensitive siting, reductions to the Scheme boundary, minimum offsets from key receptors, retention of existing vegetation, and the provision of new landscape planting and enhancement. The Landscape and Visual Impact Assessment (LVIA) assesses the effectiveness of the mitigation measures over time and concludes that, in the majority of locations, where significant adverse visual effects are recorded, the visual effects would reduce to non-significant as mitigation planting establishes and matures. This demonstrates that the proposed mitigation is effective in reducing the visual effects of the Scheme. NPS EN-1 recognises at para 5.10.5 that *"Virtually all nationally significant energy infrastructure projects will have adverse effects on the landscape, but there may also be beneficial landscape character impacts arising from mitigation."* The LVIA has identified that there would be some long-term significant effects on the visual amenity of users of some localised footpaths, as a result of the Scheme. This predominantly relates to locations where footpaths diagonally cross fields and mitigation planting would be inappropriate to landscape character and the legacy landscape. There are 10 receptors which would experience Significant Long Term Visual Effects for the duration of the Scheme as set out in Table 8-30 of **ES Volume 1, Chapter 8: Landscape and Visual [APP-060].** Details of the mitigation measures and their long-term management are set out in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060], Figure 3-4-1 to 3-4-5.2 Landscape and Ecology Mitigation Plan [APP-084]** and secured within the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]**. The preparation, approval and implementation of the detailed Landscape and Ecological Management Plan, substantially in accordance with the **OLEMP [APP-283]**, are secured through Requirement 7 in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that the identified mitigation measures are delivered and maintained throughout the lifetime of the Scheme.
Respondents express support and / acknowledge the need for the proposed visual mitigation measures.	The Applicant notes this comment and welcomes the support for the visual mitigation measures proposed.

Some respondents expressed concern that proposed screening, including new planting, would take too long to establish and would not provide effective mitigation in the early years of operation. Some respondents also raised concerns that screening would be less effective during the winter months.	The landscape and visual effects of the Scheme, including the effectiveness and phasing of proposed screening and planting, are assessed in the Landscape and Visual Impact Assessment (LVIA) presented in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**. The LVIA considers landscape and visual effects over time, including during the early years of the Scheme before planting is fully established, and identifies where significant effects may occur. The LVIA acknowledges that it takes time for proposed new planting to establish and mature to provide the screening required to reduce the visual effect of the Scheme. The effects of the mitigation measures are assessed at Year 1 and Year 15. The proposed change in management of existing hedgerows to allow them to grow out and be maintained at 4.5m provides a quicker method of screening of the Scheme. The LVIA recognises that there would be Adverse effects on visual amenity in the early years of operation. The visual effects of the Scheme are summarised in **ES Volume 3, Appendix 8-3-3 [APP-192]**. For the majority of the receptors where significant adverse visual effects are recorded, the visual effects would reduce to non-significant as mitigation planting establishes and matures. NPS EN-1 recognises at para 5.10.5 that *"Virtually all nationally significant energy infrastructure projects will have adverse effects on the landscape, but there may also be beneficial landscape character impacts arising from mitigation."* Mitigation measures for such effects are detailed in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060], Figure 3-4-1 to 3-4-5.2 Landscape and Ecology Mitigation Plan [APP-084]** and secured within the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]**. Proposed planting comprises a mix of native species designed to enhance biodiversity and resilience, with planting design prioritising long-term effectiveness and landscape integration. The **OLEMP [APP-283]** sets out the approach to establishment, maintenance and management of planting to ensure its effectiveness over the lifetime of the Scheme, including in the early years of operation. The LVIA includes verified viewpoints with both summer and winter photography to demonstrate year-round changes to the landscape. Photomontages at Year 15 illustrate the effectiveness of established planting, including during the winter months, while also demonstrating the intended retention of openness across the receiving landscape. Hedgerows on the western edge of fields within Lime Down C, which border the Cotswolds National Landscape, are proposed to be maintained at approximately 1.5 metres (or as existing, if greater) to retain open views within the setting of the Cotswolds National Landscape. This management approach is set out in the **OLEMP [APP-283]**.

	The preparation, approval and implementation of the detailed Landscape and Ecological Management Plan, substantially in accordance with the **OLEMP [APP-283]**, are secured through Requirement 7 in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that mitigation planting and screening measures are delivered and maintained throughout the lifetime of the Scheme.
Some respondents expressed concern that the proposed buffer zones are insufficient and should be increased.	The location and extent of buffer zones and minimum offsets have been informed by an iterative design process and are assessed in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**. The Landscape and Visual Impact Assessment (LVIA) considers minimum offsets from residential properties, public rights of way, landscape features and designated areas, and assesses the resulting landscape and visual effects using realistic worst-case design parameters. NPS EN-1 recognises at para 5.10.5 that *"Virtually all nationally significant energy infrastructure projects will have adverse effects on the landscape, but there may also be beneficial landscape character impacts arising from mitigation."* The LVIA concludes that, with the proposed buffers and embedded mitigation in place, landscape and visual effects are appropriately mitigated. The effectiveness of these measures over time is also assessed, including the role of planting, retained vegetation and landscape integration in reducing visual effects. However as noted above, although these measures reduce the effects of the Scheme on nearly all receptors, there are 10 visual receptors which would experience Significant Visual Effects for the duration of the Scheme as set out Table 8-30 of **ES Volume 1, Chapter 8: Landscape and Visual [APP-060].** These effects predominantly

	relate to locations where footpaths diagonally cross fields and mitigation planting would be inappropriate to landscape character and the legacy landscape. Details of the buffer zones, landscape mitigation measures and their long-term management are set out in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060], Figure 3-4-1 to 3-4-5.2** **Landscape and Ecology Mitigation Plan [APP-084]** and secured within the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]**. The preparation, approval and implementation of the detailed Landscape and Ecological Management Plan, substantially in accordance with the **OLEMP [APP-283]**, are secured through Requirement 7 in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that the identified mitigation measures, including buffers and planting, are delivered and maintained throughout the lifetime of the Scheme.
Respondents expressed concern that the Scheme will cause light pollution.	Potential effects relating to lighting are considered within the Landscape and Visual Impact Assessment (LVIA) in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**, which considers the implications of construction, operational and decommissioning lighting on landscape and visual receptors. No significant effects of lighting, above those recorded for landscape and visual receptors, were recorded. The LVIA has considered the construction, operational and decommissioning lighting proposals for the Scheme, with details of lighting design, directionality and intermittent lighting set out in **ES Volume 1, Chapter 3: The Scheme [APP-055]**. The Scheme has been designed to minimise the need for external lighting. Lighting is not required within the Solar PV Arrays during the operational phase. Motion-sensing security lighting will be provided within substations and the BESS Area and will be used only for maintenance and security purposes. Temporary site lighting during construction and decommissioning will be required to enable safe working during hours of darkness. This lighting will be designed, as far as reasonably practicable, to minimise light spill outside the Site and Cable Route Corridor, particularly towards residential properties, highways and ecological receptors. Standard good practice measures will be employed to minimise glare and light spill during construction, operation and decommissioning. There will be no lighting on perimeter fencing. The mitigation measures to control construction lighting stated above are secured within the **Outline Construction Environmental Management Plan [APP-277]**, and operational lighting controls (also referenced above) form part of the **Outline Operational Environmental Management Plan [APP-278]**. The preparation, approval and implementation of detailed

	management plans, substantially in accordance with these outline plans, are secured through requirements in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring lighting impacts are appropriately controlled throughout the lifetime of the Scheme.
Some respondents expressed support for the use of underground cables for the grid connection. Some respondents also expressed opposition to the use of overhead pylons.	The Applicant is proposing to construct the connection between the solar park, BESS and the existing National Grid substation by installing underground cables, as set out within **ES Volume 1 Chapter 3 The Scheme [APP-055**] so the Applicant welcomes the support for this method. The Applicant is not proposing to use pylons or overhead lines.
Some respondents expressed concern about the Scheme's proximity to the Cotswolds National Landscape (CNL), formally the Cotswolds Area of Natural Beauty (AoNB). Some respondents raised concerns about potential effects of the Scheme on the tranquillity of the Cotswolds National Landscape.	The Cotswolds National Landscape (CNL) is fully assessed as a standalone receptor within **ES Volume 3, Appendix 8.6: Assessment of Effects on the Special Qualities of the Cotswolds National Landscape [APP-197]**. This assessment considers the effects of the Scheme on landscape character, visual amenity and the special qualities of the CNL, including tranquillity. The assessment found that there would be some short term impact to landscape character within the setting of the CNL but due to the avoidance measures embedded within the Scheme, harm to the CNL itself would be minimal with beneficial effects in the long term which would further the purposes of the designation. In respect of visual amenity, some short-term adverse effects would be experienced by a small number of visual receptors with views to and from the CNL. However, these would reduce over time as a result of the proposed mitigation. The assessment of effects on the special qualities of the CNL scoped out 3 SQs as there is no association with the Site. The assessment found that there are no direct effects on the remaining SQs. There are some Minor/ Negligible short-term effects on a small number of

	visual receptors within the setting of the CNL which effect SQ7 -Tranquillity and SQ13 Archaeology and historic associations. However, these effects are mitigated by Year 15 when proposed vegetation has matured. The assessment also found that there would be beneficial effects on SQ 6 – Biodiversity and nature recovery as a result of the delivery of approximately 119.7 hectares of flower-rich neutral grassland (as defined in the BNG assessment) and SQ 12 - An accessible landscape as a result of the delivery of approximately 12.8km of new permissive paths within the setting of the CNL. The remaining SQs would remain entirely intact. The Scheme was refined through an iterative design process to avoid and reduce effects on the CNL and its setting. Panels along the edge of the CNL were removed from the Order Limits in fields C2, C3 and C4 where significant visual effects on receptors within the CNL were identified. Panels were also removed from fields C1, C6, C8, the western section of C9 and the majority of C10, with this land now proposed for ecological mitigation to protect the setting of the CNL. In addition, panels within fields A11 and A12 were removed and the land repurposed for ecological mitigation to protect the setting of the CNL towards Sherston. All land parcels adjacent to the CNL are proposed to deliver habitat enhancement, informed by the CNL Management Plan and the Cotswolds National Landscape Strategy and Guidelines, to further the purposes of the designation. Details of the proposed landscape and ecological mitigation and enhancement measures such as the avoidance measures to remove panels from the boundary of CNL are provided in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060], Figure 3-4-1 to 3-4-5.2 Landscape and Ecology Mitigation Plan [APP-084]** and secured within the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283],** and the **Outline Ecological Protection and Mitigation Strategy (EPMS) [APP-284]**. The preparation, approval and implementation of the detailed Landscape and Ecological Management Plan, substantially in accordance with the **OLEMP [APP-283]**, are secured through Requirement 7 in Schedule 2 of the Draft Development Consent Order [APP-016]. The preparation, approval and implementation of the detailed Ecological Protection and Mitigation Strategy, substantially in accordance with the **EPMS [APP-284]**, are secured through Requirement 8 in Schedule 2 of the **Draft Development Consent Order [APP-016]**. These requirements ensure that the identified mitigation and enhancement measures are delivered and maintained throughout the lifetime of the Scheme.
Ecology and Biodiversity, and Arboriculture	

Some respondents expressed concern about the Scheme's potential impact on the local environment, wildlife, biodiversity and ecology. Some respondents suggested that the Scheme would displace wildlife or result in the loss or reduction of habitats. Some respondents raised particular concerns about potential effects on wildlife during the construction phase.	Potential impacts on ecology and biodiversity are fully assessed in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061].** This assessment considers baseline ecological conditions and evaluates likely significant effects arising during the construction, operation and decommissioning phases of the Scheme. It identifies avoidance, mitigation and enhancement measures to address potential impacts on habitats and protected and notable species. It also identifies opportunities for ecological enhancement, including the creation and long-term management of habitats, and delivery of biodiversity net gain. The Applicant notes that the approach to the assessment in relation to ecology and biodiversity in general is under discussion with Wiltshire Council and Natural England and is set out in the relevant Statement of Common Ground to be submitted at Deadline 1**.** During construction, specific measures are proposed to avoid disturbance and displacement of wildlife. These include protective buffers around sensitive habitats and features, timing restrictions on vegetation clearance, pre-construction ecological surveys, species-specific mitigation, and pollution prevention controls which are set out in the **Outline Ecological Protection and Mitigation Strategy (EPMS) [APP-284**]. Measures to protect trees and hedgerows are also set out in **ES Volume 1, Chapter 10: Arboriculture [APP-062]**. The Scheme will also result in the cessation of intensive arable farming within the Solar PV Sites. As identified in **ES Volume 1, Chapter 9 [APP-061]**, this is expected to reduce the ongoing application of herbicides and pesticides, supporting improvements in habitat quality over the operational lifetime of the Scheme. The reversion of existing arable land within the Solar PV Sites to predominantly grassland habitats can be expected to benefit a wide range protected and notable species, as identified in **ES Volume 1, Chapter 9 [APP-061].** Mitigation and enhancement measures are detailed in the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]** and the **Outline Ecological Protection and Mitigation Strategy (OEPMS) [APP-284]**, which set out habitat creation, species protection measures, buffer zones and long-term ecological management. The preparation, approval and implementation of the detailed Landscape and Ecological Management Plan, substantially in accordance with the **OLEMP [APP-283]**, are secured through Requirement 7 in Schedule 2 of the **Draft Development Consent Order [APP-016]**. The preparation, approval and implementation of the detailed Ecological Protection and Mitigation Strategy, substantially in accordance with the **OEPMS [APP-284]**, are secured through Requirement 8 in Schedule 2 of the **Draft Development Consent Order [APP-016]**. These requirements ensure that ecological protection and enhancement measures are delivered and maintained throughout construction and operation of the Scheme.

Respondents expressed concern for the Scheme's impact to ponds.	All existing ponds within the Order Limits will be retained and protected, as set out in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**. Sections 9.10.127 to 9.10.132 confirm that no ponds are anticipated to be directly impacted through habitat loss or fragmentation as a result of the Scheme, and that a minimum 10 metre development-free buffer from all ponds will be maintained to ensure ponds and their immediate surrounding habitats remain unimpacted. With embedded mitigation in place, no significant effects on ponds are anticipated during construction or operation. In addition, opportunities to create new areas of standing water have been explored, including the restoration of historic farm ponds previously lost to agriculture (also known as 'ghost ponds'). Sections 9.10.133 to 9.10.134 confirm that nine historic ponds will be restored and new ponds created, managed for wildlife benefit over the lifetime of the Scheme. These proposed enhancements are shown in **ES Volume 2, Figure 3-4: Landscape and Ecological Mitigation Plan [APP-084]** and detailed in the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]**. As a result, the ES concludes that the Scheme is expected to deliver a significant beneficial effect on standing water habitats and associated species. The preparation, approval and implementation of the detailed Landscape and Ecological Management Plan and Ecological Protection and Mitigation Strategy, substantially in accordance with the **OLEMP [APP-283]** and **Outline Ecological Protection and Mitigation Strategy (OEPMS) [APP-284]**, are secured through Requirements 7 and 8 in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that pond protection and enhancement measures are delivered and maintained throughout the lifetime of the Scheme. The Applicant notes that the approach to the assessment in relation to ponds has been discussed with Wiltshire Council and is set out in the relevant Statement of Common Ground to be submitted at Deadline 1.
Some respondents expressed concern that the proposed ecological mitigation measures are insufficient or would be ineffective. Some respondents also expressed scepticism that Biodiversity Net Gain (BNG) would be achieved.	Potential impacts of the Scheme on ecology and biodiversity are assessed in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**, which considers baseline conditions and evaluates likely effects during construction, operation and decommissioning. The assessment identifies embedded and additional mitigation measures and concludes that, with these measures in place, no unacceptable significant adverse effects on ecology and biodiversity are anticipated. The Applicant notes that the approach to identifying and securing mitigation measures is under discussion with Wiltshire Council, Natural England and the Environment Agency and is set out in the relevant Statement of Common Grounds to be submitted at Deadline 1, in accordance with the Rule 6 Letter [PD-006]

	A comprehensive package of habitat retention, creation, enhancement and long-term management measures is proposed to avoid, reduce and mitigate impacts and to deliver Biodiversity Net Gain. These include the protection of existing habitats, restoration of lost features such as historic ponds, creation of new habitats, and long-term ecological management to improve habitat quality over the lifetime of the Scheme. The ecological mitigation and enhancement proposals, including BNG measures, are illustrated in **ES Volume 2, Figure 3-4: Landscape and Ecological Mitigation Plan [APP-084]** and detailed in the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]** and the **Outline Ecological Protection and Mitigation Strategy (OEPMS) [APP-284]**. The **OLEMP [APP-283]** includes provisions for habitat establishment, maintenance and ecological monitoring to confirm that mitigation and enhancement measures are functioning as intended and to identify and implement remedial measures where required. The preparation, approval and implementation of the detailed Landscape and Ecological Management Plan and Ecological Protection and Mitigation Strategy, substantially in accordance with the **OLEMP [APP-283]** and **OEPMS [APP-284]**, are secured through Requirements 7 and 8 in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that ecological mitigation and enhancement measures are delivered, monitored and maintained throughout the lifetime of the Scheme.
Respondents expressed concern that the proposed security fencing could restrict wildlife movement and result in habitat fragmentation or loss.	Potential effects of boundary treatments and fencing on ecology and wildlife movement are assessed in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**, which considers impacts on habitats and species during construction, operation and decommissioning and identifies measures to avoid or mitigate barriers to wildlife movement. The Scheme design incorporates fencing around the Solar PV Arrays that is permeable to wildlife, with the exception of deer. This means animals (excluding deer only) will be able to freely access habitats within the Solar PV Sites without the need for wildlife gates. In addition, wide buffers are retained around the peripheries of the Solar PV Sites to allow wildlife, including deer, to move between favoured habitats. These measures are described in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]** and detailed in the **Outline Ecological Protection and Mitigation Strategy (OEPMS) [APP-284]**. Fencing will be subject to regular inspection and maintenance to ensure continued permeability to wildlife and effective functioning over the lifetime of the Scheme. Measures for ongoing ecological management and maintenance are set out in the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]**. The preparation, approval and implementation of the detailed Ecological Protection and Mitigation Strategy and Landscape and Ecological Management Plan, substantially in

	accordance with the **EPMS [APP-284]** and **OLEMP [APP-283]**, are secured through Requirements 8 and 7 respectively in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that fencing design and maintenance measures are delivered and maintained throughout the lifetime of the Scheme.
Respondents expressed general support for the Scheme's proposed environmental enhancements, including the delivery of Biodiversity Net Gain (BNG).	The Applicant makes note of this Representation and welcomes the support for the Scheme's environmental improvements and Biodiversity Net Gain (BNG).
Respondents expressed concern for the potential impacts on otters.	Potential impacts of the Scheme on otters are assessed in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**, which considers baseline conditions and evaluates likely effects on protected species during construction, operation and decommissioning. The assessment of impacts on otters is set out in Paragraphs 9.10.207 to 9.10.220. It concludes that, with embedded mitigation in place, no significant adverse effects on otters are anticipated. The Applicant notes that the approach to the assessment in relation to otters is under discussion with Wiltshire Council, Natural England and the Environment Agency and is set out in the relevant Statement of Common Ground to be submitted at Deadline 1. Measures to avoid disturbance to otters and protect riparian habitats during construction are set out in the **Outline Ecological Protection and Mitigation Strategy (OEPMS) [APP-284]**. These include pre-construction surveys, protective buffers to watercourses, controls on working practices near sensitive habitats, and pollution prevention measures. The preparation, approval and implementation of the detailed Ecological Protection and Mitigation Strategy, substantially in accordance with the **EPMS [APP-284]**, are secured through Requirement 8 in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring otter protection measures are delivered and maintained throughout construction and operation of the Scheme.
Respondents expressed concern for the potential impact on Great Crested Newts.	Potential impacts of the Scheme on amphibians, including great crested newts, are assessed in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**, which considers baseline conditions and evaluates likely effects during construction, operation and decommissioning. Sections 9.10.127 to 9.10.132 confirm that no ponds are anticipated to be directly impacted through habitat loss or fragmentation as a result of the Scheme. A minimum 10 metre development-free buffer from all ponds will be maintained to ensure ponds and their surrounding habitats remain unimpacted. Where ponds have confirmed or assumed presence of great crested newts, a 50-metre minimum buffer is applied. With embedded mitigation in place, no significant adverse effects on amphibians, including great crested newts, are anticipated during construction or operation.

	The Applicant notes that the approach to the assessment in relation to great crested newts has been agreed with Natural England and is under discussion with Wiltshire Council and is set out in the relevant Statement of Common Ground to be submitted at Deadline 1, in accordance with the Rule 6 Letter [PD-006] Measures to avoid disturbance to amphibians and protect aquatic habitats during construction are set out in the **Outline Ecological Protection and Mitigation Strategy (OEPMS) [APP-284]**, including pre-construction surveys, species-specific mitigation, protective buffers and pollution prevention controls. All works within the Cable Route Corridor will be registered under Natural England's District Level Licensing (DLL) scheme. Under the DLL scheme, adequate compensation through strategic off-site habitat creation and maintenance will be provided to address all adverse impacts associated with works within the Cable Route Corridor and ensure legal compliance. In addition, Sections 9.10.133 and 9.10.134 confirm that opportunities to create new areas of standing water have been incorporated into the Scheme, including the restoration of historic 'ghost ponds' previously lost to agriculture. These enhancements are shown in **ES Volume 2, Figure 3-4: Landscape and Ecological Mitigation Plan [APP-084]** and detailed in the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]**. As a result, the ES concludes that the Scheme is expected to deliver a significant beneficial effect on pond habitats and associated species, including amphibians. The preparation, approval and implementation of the detailed Ecological Protection and Mitigation Strategy and Landscape and Ecological Management Plan, substantially in accordance with the O**EPMS [APP-284]** and **OLEMP [APP-283]**, are secured through Requirements 8 and 7 respectively in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring amphibian protection and habitat enhancement measures are delivered and maintained throughout the lifetime of the Scheme.
Respondents expressed concern for the potential impact on deer.	Potential impacts of the Scheme on mammals, including deer, are assessed in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**, which considers baseline conditions and evaluates likely effects on wildlife movement and habitat connectivity during construction, operation and decommissioning. The Scheme design incorporates perimeter fencing around the Solar PV Arrays that is permeable to all wildlife except deer. To ensure continued habitat connectivity for deer, wide buffers are retained around the peripheries of the Solar PV Sites, allowing deer to move between favoured habitats, field boundary features and woodlands without being forced onto surrounding roads. These measures are described in **ES Volume 1, Chapter 9: Ecology and**

	Biodiversity [APP-061] and detailed in the **Outline Ecological Protection and Mitigation Strategy (EPMS) [APP-284]**. Long-term ecological management to maintain habitat connectivity is set out in the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]**. The preparation, approval and implementation of the detailed Ecological Protection and Mitigation Strategy and Landscape and Ecological Management Plan, substantially in accordance with the **EPMS [APP-284]** and **OLEMP [APP-283]**, are secured through Requirements 8 and 7 respectively in Schedule 2 of the Draft Development Consent Order [APP-016], ensuring mitigation measures for deer movement and habitat connectivity are delivered and maintained throughout the lifetime of the Scheme.
Some respondents expressed concern about potential impacts on birds. Some respondents raised specific concerns about the risk of birds colliding with solar panels. A number of respondents identified particular bird species of concern.	Potential impacts of the Scheme on birds, including breeding and wintering species within and around the Order Limits, are assessed in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**. The assessment considers baseline bird assemblages and evaluates likely effects during construction, operation and decommissioning, including habitat loss, disturbance and displacement. It concludes that, with embedded mitigation in place, no unacceptable significant adverse effects on bird populations are anticipated. The assessment also notes that there is very limited evidence that solar PV panels present a risk of bird collision or fatality. The Scheme design and mitigation measures are therefore focused on avoiding / mitigating habitat loss and disturbance, rather than collision risk. The Applicant notes that the approach to the assessment in relation to birds in general is under discussion with Wiltshire Council and is set out in the relevant Statement of Common Ground to be submitted at Deadline 1**.** Habitat creation and enhancement measures to support bird species are incorporated into the Scheme, including areas provided for skylark mitigation and wider grassland and hedgerow enhancement. These measures are illustrated in **ES Volume 2, Figure 3-4: Landscape and Ecological Mitigation Plan [APP-084]** and detailed in the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]**. Measures to safeguard nesting and foraging birds during construction and operation, including timing of vegetation clearance, pre-construction checks and species-specific protection measures, are set out in the **Outline Ecological Protection and Mitigation Strategy (OEPMS) [APP-284]**. The preparation, approval and implementation of the detailed Landscape and Ecological Management Plan and Ecological Protection and Mitigation Strategy, substantially in accordance with the **OLEMP [APP-283]** and **EPMS [APP-284]**, are secured through Requirements 7 and 8 in Schedule 2 of the Draft Development Consent Order [APP-

	016], ensuring bird protection and habitat enhancement measures are delivered and maintained throughout the lifetime of the Scheme.
Some respondents expressed concern about potential impacts on skylarks.	Potential impacts of the Scheme on skylarks are assessed in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**, which considers baseline bird assemblages and evaluates likely effects on breeding farmland bird species during construction, operation and decommissioning. The assessment identifies skylarks as a key species of conservation interest within the Scheme area. It concludes that a proportion of the current skylark population will be displaced from the Solar PV Sites, which will give rise to an adverse residual effect at a Local level. The Applicant notes that the approach to the assessment with relation to skylark is under discussion with Wiltshire Council and is set out in the relevant Statement of Common Ground to be submitted at Deadline 1. Skylark-specific mitigation and habitat enhancement measures are incorporated into the Scheme design to reduce effects as far as practicable. These include the provision of suitably large, open set-aside and grassland habitats designed to provide appropriate breeding and foraging conditions. These measures are illustrated in **ES Volume 2, Figure 3-4: Landscape and Ecological Mitigation Plan [APP-084]** and detailed in the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]**.

	Measures to safeguard nesting skylarks during construction, including timing restrictions on vegetation clearance and pre-construction ecological checks, are set out in the **Outline Ecological Protection and Mitigation Strategy (OEPMS) [APP-284]**. The preparation, approval and implementation of the detailed Landscape and Ecological Management Plan and Ecological Protection and Mitigation Strategy, substantially in accordance with the **OLEMP [APP-283]** and **OEPMS [APP-284]**, are secured through Requirements 7 and 8 in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring skylark mitigation and long-term habitat management measures are delivered and maintained throughout the lifetime of the Scheme.
Respondents expressed concern for impact to bats.	Potential impacts of the Scheme on bats, including species associated with the Bath and Bradford-on-Avon Bats SAC, are assessed in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**. The assessment considers baseline bat activity, roosting, foraging and commuting habitats, and evaluates likely effects during construction, operation and decommissioning. The Applicant notes that the approach to the assessment in relation to bats is under discussion with Natural England and Wiltshire Council and is set out in the relevant Statement of Common Ground to be submitted at Deadline 1**.** The detailed assessment of likely significant impacts and effects on bats is set out in **Section 9.10** of **ES Volume 1, Chapter 9 [APP-061].** The assessment is underpinned by a comprehensive programme of bat surveys, with detailed survey methods and results provided in **ES Volume 3, Appendix 9-3: Bat Survey Report [APP-200]**. Using this evidence, the ES identifies potential impact pathways and appropriate avoidance and mitigation measures. The assessment concludes that, with embedded mitigation in place, no significant adverse effects on bat populations or on the integrity of the Bath and Bradford-on-Avon Bats SAC are anticipated. Mitigation measures for bats, including habitat retention, buffer distances, timing of works and protection of commuting corridors, are set out in the **Outline Ecological Protection and Mitigation Strategy (EPMS) [APP-284]** and long-term habitat management measures are detailed in the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]**. The preparation, approval and implementation of the detailed Ecological Protection and Mitigation Strategy and Landscape and Ecological Management Plan, substantially in accordance with the **EPMS [APP-284]** and **OLEMP [APP-283]**, are secured through Requirements 8 and 7 respectively in Schedule 2 of the **Draft Development Consent Order**

	[APP-016], ensuring bat protection and habitat management measures are delivered and maintained throughout the lifetime of the Scheme.
Respondents expressed concern for impact on hares.	Potential impacts of the Scheme on brown hares are assessed in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**, which considers baseline conditions and evaluates likely effects on mammals during construction, operation and decommissioning. The assessment concludes that, with embedded mitigation in place, no significant adverse effects on brown hares are anticipated. The Scheme design retains extensive areas of grassland and field margin habitats, which provide suitable foraging and shelter opportunities for hares. The Applicant notes that the approach to the assessment in relation to brown hares has been agreed with Wiltshire Council and is set out in the relevant Statement of Common Ground to be submitted at Deadline 1**.** Long-term habitat management measures are set out in the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]**. The assessment also notes that brown hares are known to take shelter beneath solar panels on operational solar sites, where the retention of grassland beneath and between arrays can provide suitable habitat conditions. The preparation, approval and implementation of the detailed Landscape and Ecological Management Plan, substantially in accordance with the **OLEMP [APP-283]**, are secured through Requirement 7 in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring habitat management measures benefiting hares are delivered and maintained throughout the lifetime of the Scheme.
Respondents expressed concern for impact to badgers.	Potential impacts of the Scheme on badgers are assessed in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**, which considers baseline conditions and evaluates likely effects on mammals during construction, operation and decommissioning.

	The assessment identifies the presence of badger setts and foraging habitats within and around the Scheme and evaluates potential effects from habitat disturbance, displacement and construction activities. It concludes that, with embedded mitigation in place, no significant adverse effects on badgers are anticipated. The Applicant notes that the approach to the assessment in relation to badgers has been with Wiltshire Council and is under discussion with Natural England and Wiltshire Council and is set out in the relevant Statement of Common Ground to be submitted at Deadline 1. Mitigation measures to protect badgers include the application of minimum buffer distances around setts, timing controls on works near sensitive locations, pre-construction surveys, and habitat retention to maintain foraging and movement corridors. These measures are detailed in the **Outline Ecological Protection and Mitigation Strategy (EPMS) [APP-284]** and long-term habitat management provisions are set out in the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]**. The preparation, approval and implementation of the detailed Ecological Protection and Mitigation Strategy and Landscape and Ecological Management Plan, substantially in accordance with the **EPMS [APP-284]** and **OLEMP [APP-283]**, are secured through Requirements 8 and 7 respectively in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring badger protection and habitat management measures are delivered and maintained throughout the lifetime of the Scheme.
Respondents expressed concern for impact to voles.	Potential impacts of the Scheme on water voles and other small mammals are assessed in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**, which considers baseline conditions and evaluates likely effects on protected and notable species during construction, operation and decommissioning. The assessment identifies suitable habitats for water voles within and adjacent to the Scheme and evaluates potential impacts from habitat disturbance and construction activities. It concludes that, with embedded mitigation in place, no significant adverse effects on voles are anticipated. The Applicant notes that the approach to the assessment in relation to water voles is under discussion with Natural England, Wiltshire Council and the Environment Agency, and is set out in the relevant Statement of Common Grounds to be submitted at Deadline 1. Mitigation measures to protect vole habitats include the application of minimum buffer distances to ditches and watercourses, pre-construction ecological surveys, controls on working practices near sensitive habitats, and pollution prevention measures. These are detailed in the **Outline Ecological Protection and Mitigation Strategy (EPMS) [APP-284]**. Long-term habitat

	protection and management measures are set out in the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]**. The preparation, approval and implementation of the detailed Ecological Protection and Mitigation Strategy and Landscape and Ecological Management Plan, substantially in accordance with the **EPMS [APP-284]** and **OLEMP [APP-283]**, are secured through Requirements 8 and 7 respectively in Schedule 2 of the **Draft Development Consent Order [APP-016],** ensuring vole protection and habitat management measures are delivered and maintained throughout the lifetime of the Scheme.
Some respondents expressed concern about potential impacts on insects and other invertebrates.	Potential impacts of the Scheme on invertebrates are assessed in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]**, which considers baseline conditions and evaluates likely effects on invertebrate species and their habitats during construction, operation and decommissioning. The assessment identifies that existing habitats within and around the Scheme support a range of invertebrate species and evaluates potential impacts arising from habitat change and disturbance. It concludes that, with embedded mitigation in place, no significant adverse effects on invertebrate populations are anticipated. The Applicant notes that the approach to the assessment in relation to invertebrates is under discussion with Wiltshire Council and the Environment Agency and is set out in the relevant Statement of Common Ground to be submitted at Deadline 1**.** The Scheme includes habitat creation and enhancement measures designed to improve invertebrate habitat availability and connectivity, including species-rich grassland creation, hedgerow enhancement and pond restoration. These measures are illustrated in **ES Volume 2, Figure 3-4: Landscape and Ecological Mitigation Plan [APP-084]** and detailed in the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]**. The preparation, approval and implementation of the detailed Landscape and Ecological Management Plan, substantially in accordance with the **OLEMP [APP-283]**, are secured through Requirement 7 in Schedule 2 of the **Draft Development Consent Order [APP-016],** ensuring habitat creation and management measures benefiting invertebrates are delivered and maintained throughout the lifetime of the Scheme.
Respondents expressed concern regarding the potential loss of trees as a result of the Scheme.	No veteran or ancient trees are proposed to be removed to facilitate the Scheme. The Scheme has been designed through an iterative process to retain existing arboricultural features as far as practicable and to avoid and reduce impacts on trees, groups of trees and woodland.

	Potential impacts on arboriculture are fully assessed in **ES Volume 1, Chapter 10: Arboriculture [APP-062]**, which considers baseline arboricultural conditions and evaluates likely effects during construction, operation and decommissioning. This assessment identifies where tree removal or pruning may be required and concludes that, with embedded mitigation in place, no significant adverse residual effects on arboricultural features are anticipated. Embedded mitigation measures include sensitive siting of infrastructure, minimum offsets from retained trees, protection of root protection areas, supervision by an Arboricultural Clerk of Works, and the use of trenchless construction techniques where required to avoid impacts on high-value trees. Where any unavoidable tree losses are necessary, compensatory tree and woodland planting is proposed as part of the Scheme's landscape and ecological mitigation. Details of tree protection, replacement planting and long-term management are set out in the **Outline Landscape and Ecological Management Plan [APP-283]** and the **Outline Construction Environmental Management Plan [APP-277]**. The preparation, approval and implementation of detailed landscape and ecological management plans, substantially in accordance with the outline plans, are secured through requirements in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that arboricultural mitigation measures are delivered and maintained throughout the lifetime of the Scheme.
Respondents expressed concern regarding the potential loss of hedgerows as a result of the Scheme.	The Scheme has been designed through an iterative design process to retain existing hedgerows and grassland habitats as far as practicable. Potential impacts on hedgerows are assessed in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]** and **ES Volume 1, Chapter 10: Arboriculture [APP-062]**, which consider baseline conditions and evaluate likely effects on hedgerow features during construction, operation and decommissioning. The assessments identify that some hedgerow loss is required to facilitate access and infrastructure. However, anticipated hedgerow losses represent a small proportion of the existing hedgerow network within the Order Limits. With embedded mitigation in place, no significant adverse effects on hedgerow features are anticipated. Compensatory planting and enhancement measures are proposed which will significantly exceed the extent of hedgerow loss. Proposed new hedgerows and habitat enhancements are illustrated in **ES Volume 2, Figure 3-4: Landscape and Ecological Mitigation Plan [APP-084]** and detailed in the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]**. The preparation, approval and implementation of the detailed Landscape and Ecological Management Plan, substantially in accordance with the **OLEMP [APP-283]**, are secured

	through Requirement 7 in Schedule 2 of the **Draft Development Consent Order [APP-016],** ensuring hedgerow retention, replacement planting and long-term management are delivered and maintained throughout the lifetime of the Scheme.
Respondents expressed concern regarding the potential loss of, and impacts to, ancient trees as a result of the Scheme.	Potential impacts on arboricultural features, including ancient and veteran trees, are assessed in **ES Volume 1, Chapter 10: Arboriculture [APP-062]**, which considers baseline conditions and evaluates likely effects during construction, operation and decommissioning. The assessment confirms that no ancient or veteran trees are proposed to be removed to facilitate the Scheme. The Scheme has been designed through an iterative process to retain existing arboricultural features as far as practicable and to avoid impacts on trees of high value. Embedded mitigation measures include minimum offsets from retained trees, protection of root protection areas, and supervision by an Arboricultural Clerk of Works during construction. These measures ensure that retained trees, including ancient and veteran specimens, are protected throughout construction and operation of the Scheme. Tree protection and long-term arboricultural management measures are set out in the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]**, with construction-phase protection measures detailed in the **Outline Construction Environmental Management Plan [APP-277]**. The preparation, approval and implementation of detailed management plans, substantially in accordance with the outline plans, are secured through requirements in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring ancient and veteran trees are protected throughout the lifetime of the Scheme.
Soils and Agriculture, and Ground Conditions	

Respondents expressed concern regarding the use and potential loss of agricultural land as a result of the Scheme. Some respondents considered that agricultural land should not be used for solar development, with particular reference to the use of high-grade or Best and Most Versatile (BMV) land. Some respondents indicated a preference for solar development to be located on previously developed (brownfield) land. Some respondents expressed a preference for rooftop solar over ground-mounted solar, suggesting that panels should instead be installed on existing buildings, including schools, industrial warehouses and residential properties. Some respondents also suggested that solar panels should be sited alongside existing infrastructure corridors, such as railway lines, motorways or other major roads.	An assessment of the potential effects of the Scheme on soils and agricultural land is provided in **ES Volume 1, Chapter 17 Soils and Agriculture [APP-069]**. This chapter considers baseline agricultural land quality, including Best and Most Versatile (BMV) land, and assesses likely significant effects arising from construction, operation and decommissioning of the Scheme, together with embedded mitigation measures. The areas of each Agricultural Land Classification (ALC) grade affected by the Scheme are set out **in ES Volume 1, Chapter 17, Section 17.7 [APP-069]**. Of the agricultural land within the Solar PV Sites, approximately 477.4 hectares (around 67%) is classified as Subgrade 3b or Grade 4 and is therefore not BMV land. There is no Grade 1 land, around 30.8 hectares (approximately 4%) of Grade 2 land, and approximately 209.3 hectares (around 29%) of Subgrade 3a land. The distribution of ALC grades is shown in **ES Volume 2, Figure 17-2: Agricultural Land Classification Mapping [APP-172]**. The Applicant has had regard to agricultural land quality in the design and site selection process and has sought, where practicable, to locate infrastructure on lower quality land. The Scheme will result in a temporary but long-term and reversible loss of agricultural land for the operational life of the Scheme. As set out in **ES Volume 1, Chapter 17, Section 17.10 [APP-069]**, this gives rise to a temporary, long-term moderate adverse effect on agricultural land overall, and a temporary, long-term major/moderate adverse effect on BMV land, both of which are assessed as significant. These effects are fully reported in the ES and are a matter for the Secretary of State to weigh in the planning balance against the need for the Scheme and its wider benefits. There are no significant permanent effects on agricultural land, as all land will be returned to its original use and condition as far as practicable following decommissioning. The Applicant notes that the approach to assessing the quality of the agricultural land is under discussion with Natural England and is set out in the relevant Statement of Common Ground to be submitted at Deadline 1**.** Measures to avoid and minimise effects on soils and agricultural land are embedded within the Scheme design and secured through Schedule 2, Requirement 17 of the **Draft DCO [APP-016]** which includes the preparation and implementation of a Soil Resources Management Plan (SRMP) in accordance with the **Outline SRMP [APP-280].** The SRMP will control soil handling, storage and reinstatement during construction, operation and decommissioning, and a requirement to prepare and implement a Decommissioning Strategy in accordance with the **Outline Decommissioning Strategy [APP-279],** which is secured by Schedule 2, Requirement 20 of the **Draft DCO [APP-016]**. The **Outline Landscape and Ecological Management Plan [APP-283]** details how grassland and other habitat will be established beneath and between the solar panels. The detailed LEMP

	will be secured through Schedule 2, Requirement 7 of the **Draft DCO [APP-016]**. Through the establishment and maintenance of long-term grassland beneath and between the solar arrays, soil health, quality and structure are anticipated to improve over the lifetime of the Scheme, resulting in a temporary, moderate beneficial effect on soil resources at decommissioning, which is assessed as significant (**ES Volume 1, Chapter 17, Sections 17.10 and 17.12 [APP-069]**). In relation to suggestions that brownfield land or alternative locations should be used, including rooftop, these matters are addressed in **ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP-056] and in the Statement of Need [APP-266]**. The Applicant has considered alternatives, including previously developed land and other forms of solar deployment, as part of the site selection and design evolution process. As shown in Table 2-2 of **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]**, the Applicant has considered previously developed land / brownfield land over 1 hectare within the area of search, based on the brownfield land registers of the relevant Local Planning Authorities, and concluded that none of the sites are large enough to provide a viable land parcel of at least 40 ha and sites were not considered to be available as they have planning permission for residential development and/or are allocated for residential/mixed use development. With regard to siting the Scheme alongside existing infrastructure corridors such as motorways, major roads and railways, **ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP-056]** and the accompanying **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]** set out the alternatives considered by the Applicant. The assessment did not identify any unconstrained, suitable and available land that could utilise existing infrastructure corridors. As set out in, **ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP-056],** discussions were had with Wiltshire Council regarding routeing the Cable Route Corridor to follow the A350, but this was discounted due to concerns of potential disruptions to road traffic associated with installation of the cable immediately adjacent to the A350. National policy and government guidance, as set out in the **Statement of Need [APP-266]**, recognise that while rooftop and smaller-scale solar installations are an important part of the energy mix, they cannot alone meet the scale of capacity required to achieve clean power and net zero objectives. Large-scale ground-mounted solar therefore remains necessary in addition to, not instead of, rooftop solar.

Respondents expressed concern that the Scheme could adversely affect UK food security and domestic food production.	The effects of the Scheme on agricultural land, including land quality and productivity, are assessed in **ES Volume 1, Chapter 17: Soils and Agriculture [APP-069]**, supported by **ES Volume 3, Appendix 17-1: Agricultural Land Classification and Soil Resource Survey Report [APP-243]**. That assessment identifies that the majority of agricultural land affected is not Best and Most Versatile (BMV) land, comprising predominantly Subgrade 3b and Grade 4 land, which is not considered high-quality agricultural land in planning terms. Government-led agricultural initiatives, such as the Sustainable Farming Incentive which is relaunching later in 2026, have prioritised soil health, environmental enhancement and climate resilience, recognising that long-term food security is influenced by a range of factors beyond land take alone, including soil condition, climate change and environmental pressures. The Scheme allows soils to remain in situ and undisturbed during operation, supporting soil recovery and long-term land health, with land reinstated and returned to agricultural use as far as practicable following decommissioning. No permanent loss of agricultural land is anticipated. The Applicant does not consider that food security will be compromised by the Scheme (or solar energy more widely). The latest figures to September 2024 indicate that solar occupied around 21,200 ha of agricultural land in the UK. In 2025, 545,000 ha of arable land in England were left uncropped (source: Department for Environment, Food & Rural Affairs, Agricultural land use in England at 1 June 2025). It should also be noted that food security is not identified as an issue within the suite of Energy National Policy Statements or the National Planning Policy Framework (NPPF). Further, the Government's UK Solar Roadmap (2025) states that solar development is not considered to compromise food security, but that the climate and nature crisis poses the greatest long-term risk to food security- a risk which the Scheme directly helps to address by providing a secure, low-carbon source of electricity. As set out in Section 2 of the **Outline Decommissioning Strategy [APP-279],** post-decommissioning of the Scheme, the landowners would choose how the land is to be used and managed. The landowner may return all of the land to arable use, although it is likely that established habitats such as hedgerows and woodland would be retained given their potential benefits to agricultural land and the wider farming estate. Whilst there is an environmental and economic cost to importing food, and it is recognised the UK imports a far greater amount of food than it exports, the impact of the Scheme on food import requirements or the food and drinks economy is not material at a national scale and has therefore not been assessed.

Respondents expressed dissatisfaction that sheep would not graze at the Site, or scepticism as to whether sheep grazing would in practice take place. Some respondents also considered that references to sheep grazing, including imagery used in consultation materials, were misleading.	The assessment of effects of the Scheme on agriculture in **ES Volume 1, Chapter 17 Soils and Agriculture [APP-069]** recognises that agricultural production beneath the solar panels would not be the primary land use during the operational phase. For the purposes of the Environmental Impact Assessment, the Scheme has been assessed on a conservative basis assuming that grassland within the Solar PV Sites will be managed through mechanical cutting rather than relying on grazing. This ensures that the assessment does not depend on livestock grazing to mitigate agricultural effects. However, **ES Volume 1, Chapter 17 Soils and Agriculture [APP-069]** also identifies that there is potential for some agricultural use to resume during operation if land beneath the panels is grazed by livestock, including sheep. Specifically, the ES notes that during the operational lifetime of the Scheme "*some agricultural use may resume within the Solar PV Sites if the area beneath the panels is grazed by livestock*". Accordingly, sheep grazing is a potential future land management option rather than a guaranteed or required component of the Scheme. The Applicant has therefore not relied on sheep grazing in the Environmental Impact Assessment, and the Scheme remains acceptable on the basis of mechanical grassland management alone. Any future decision to introduce grazing would be at the discretion of the landowners and farm operators, subject to appropriate management controls, and would not alter the conclusions of the Environmental Impact Assessment.
Respondents expressed general concern regarding the potential effects of the Scheme on soil health and land quality.	An assessment of the effects of the Scheme on soils and agricultural land quality is provided in **ES Volume 1, Chapter 17 Soils and Agriculture [APP-069]**. This chapter considers baseline soil conditions and agricultural land quality and assesses the likely significant effects arising from construction, operation, maintenance and decommissioning of the Scheme. The assessment identifies appropriate embedded mitigation measures to avoid, reduce and manage effects on soils and land quality. Measures to control soil handling, storage and reinstatement are set out in the **Outline Soil Resources Management Plan (SRMP) [APP-280]**, which is secured via Requirement 17 of the **Draft DCO [APP-016].** The SRMP provides the framework for detailed soil management methods to be implemented during construction, operation and decommissioning, ensuring that soil structure, quality and function are protected and restored. The assessment in **ES Volume 1, Chapter 17 Soils and Agriculture [APP-069]** concludes that the removal of land from intensive arable cultivation during the operational phase is expected to lead to improvements in soil health, quality and structure. This results in a temporary, moderate beneficial effect on soil resources during the operational and decommissioning phases of the Scheme, which is assessed as significant (see **ES Volume 1, Chapter 17, Section 17.12 [APP-069]**).

	The **Outline Landscape and Ecological Management Plan [APP-283]** details how grassland and other habitat will be established beneath and between the solar panels. The detailed LEMP will be secured through Schedule 2, Requirement 7 of the **Draft DCO [APP-016]**. Through the establishment and maintenance of long-term grassland beneath and between the solar arrays, soils within the Solar PV Sites are anticipated to improve over the lifetime of the Scheme. This would constitute a low magnitude of change to high sensitivity soils, giving rise to a temporary, moderate beneficial effect on soil resources during the decommissioning phase.
Hydrology, Flood Risk and Drainage	
Respondents expressed concern that the Scheme could increase flood risk, including concerns that the installation of solar panels would lead to increased flooding. Some respondents specified that this could occur as a result of increased surface water run-off from the panels. Some respondents noted that the area is already prone to flooding. Some respondents expressed that flood risk has not been adequately considered or assessed	An assessment of the effects of the Scheme on flood risk both within the Site and the surrounding area is provided in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [APP-063]**, with supporting information provided in **ES Volume 3, Appendix 11-1 to 11-9: Flood Risk Assessment and Drainage Strategy [APP-210 to APP-218]**. The assessment concludes that, with the embedded mitigation measures secured, the Scheme would not result in a material increase in off-site flood risk, including to adjacent communities and downstream receptors, and that any on-site flood risk would be managed such that the Scheme remains safe and operable for its lifetime. The assessment has been prepared in accordance with national policy and best practice guidance and in consultation with the Environment Agency and Lead Local Flood Authority and is set out in the relevant Statements of Common Grounds to be submitted at Deadline 1. The **Outline Construction Environmental Management Plan (CEMP) [APP-277]** has been developed to control construction-phase risks and ensure there is no material increase in off-site flood risk. In accordance with NPS EN-3 (paragraph 2.10.843.10.75). **Requirement 13 in Schedule 2 to the Draft DCO [APP-016]** secures that no part of the authorised development can commence until a CEMP is submitted to and approved by the relevant planning authority. The CEMP must be substantially in accordance with the Outline CEMP, and all construction works associated must be carried out in accordance with the approved CEMP. Regarding specific concerns that panels will increase flooding, the submitted assessment presented in **ES Volume 3, Appendix 11-1 Flood Risk Assessment and Drainage Strategy - Lime Down Covering Report [APP-210]** reflects established hydrological evidence that the addition of solar panels over a vegetated field does not materially increase runoff volumes, peak

	discharges or response times, and that changes in hydrologic response are primarily associated with alterations to ground cover beneath the panels rather than the panels themselves. Panelled areas are therefore designed so rainfall continues to drain to ground, with no creation of extensive impermeable surfaces and with controls in place to avoid any increase in discharge to watercourses. Measures to manage surface water runoff and drainage are set out in the outline drainage and construction management plans (**ES Volume 3, Appendix 11: Flood Risk Assessment and Drainage Strategy [APP-210 to APP-218] and Outline Construction Environmental Management Plan [APP-277]** accompanying the Application. Where drainage measures are necessary, these include permeable surfacing, infiltration features, swales and attenuation storage to manage surface water and maintain greenfield runoff behaviour, as applicable. Consistent with NPS EN-3 paragraph 2.10.84, these controls distinguish between solar PV panel areas, which drain to the existing ground and do not generally give rise to significant drainage effects, and associated infrastructure where runoff controls are required. The preparation, approval and implementation of the detailed drainage and construction management plans, substantially in accordance with the outline plans, are secured through Schedule 2 of the **Draft Development Consent Order [APP-016]**. This secures delivery and maintenance of the drainage strategy for Scheme infrastructure, together with soil and water management controls during construction, ensuring there is no material increase in off-site flood risk over the lifetime of the Scheme.
Respondents expressed concern that soil compaction resulting from surface water run-off could increase flood risk.	Potential effects relating to soil compaction and surface water runoff are assessed in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [APP-063]**, with supporting detail provided in the Flood Risk Assessment and Drainage Strategy appendices. The assessment considers how ground disturbance, construction traffic and installation of infrastructure could affect infiltration and runoff, and evaluates the implications for flood risk both within the Site and in surrounding areas. The assessment concludes that, with appropriate mitigation in place, the Scheme would not increase surface water runoff or result in a material increase in flood risk. The Applicant notes that the approach to compaction has been agreed with the Lead Local Flood Authority (LLFA) and is set out in the relevant Statement of Common Ground to be submitted at Deadline 1**.** Soil handling, storage and reinstatement measures to protect soil structure and avoid compaction are set out in the **Outline Soil Resources Management Plan (SRMP) [APP-280]**, which accompanies the DCO Application. The Outline SRMP includes measures to control construction trafficking, manage soil stripping and storage, and ensure reinstatement of soils

	following construction, thereby maintaining soil permeability and reducing the potential for compaction-related runoff. Surface water management and construction-phase controls to prevent increased runoff are secured through the **Outline Construction Environmental Management Plan [APP-277]** and **ES Volume 3, Appendix 11-1 to 11-9: Flood Risk Assessment and Drainage Strategy [APP-210 to APP-218]**which include measures to control sediment, runoff and pollution during earthworks and infrastructure installation. The preparation, approval and implementation of the detailed SRMP and CEMP, substantially in accordance with the outline plans, are secured through Requirements 17 and 13 respectively in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that soil compaction is appropriately managed and that runoff and flood risk are not increased during construction or operation of the Scheme.
Respondents expressed scepticism as to whether the proposed flood mitigation measures would be effective.	An assessment of the effects of the Scheme on flood risk, including the effectiveness of proposed mitigation measures, is provided in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [APP-063]**, with supporting information contained in the Flood Risk Assessment and Drainage Strategy appendices. The assessment has been prepared in accordance with national policy and best practice guidance and in consultation with the Environment Agency and Lead Local Flood Authority and is set out in the relevant Statements of Common Ground to be submitted at Deadline 1**.** It concludes that, with the mitigation measures in place, the Scheme would not result in a material increase flood risk within the Site or to the surrounding area. Measures to manage surface water runoff and drainage are set out in the outline drainage and construction management plans accompanying the Application (**ES Volume 3, Appendix 11: Flood Risk Assessment and Drainage Strategy [APP-210 to APP-218]).** Consistent with NPS EN-3 paragraph 2.10.84, these controls distinguish between solar PV panel areas, which drain to the existing ground and do not generally give rise to significant drainage effects, and associated infrastructure where runoff controls are required. The preparation, approval and implementation of the detailed drainage and construction management plans, substantially in accordance with the outline plans, are secured through Schedule 2 of the **Draft Development Consent Order [APP-016]**. This secures delivery and maintenance of the drainage strategy for scheme infrastructure, together with soil and water management controls during construction, ensuring there is no material increase in off-site flood risk over the lifetime of the Scheme.

Some respondents expressed concern that the Scheme could increase the risk of flooding in the surrounding area.	An assessment of the effects of the Scheme on flood risk within the Site and across the wider catchment is provided in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [APP-063]**, with supporting detail contained in The assessment considers surface water pathways, receiving watercourses and downstream receptors, including settlements and infrastructure. The Flood Risk Assessment specifically considers potential effects on settlements and locations identified by respondents. The assessment concludes that, with the embedded mitigation and the proposed drainage design in place, there would be no material increase in off-site flood risk, including to downstream communities, roads and other infrastructure. Consistent with NPS EN-3 paragraph 2.10.84, the drainage assessment differentiates between solar PV panel areas, which drain to the existing ground and do not generally give rise to significant drainage effects, and associated infrastructure where runoff controls are required. Where drainage measures are necessary, runoff rates and volumes would be controlled to maintain greenfield runoff behaviour, as applicable, using attenuation, infiltration and controlled discharge measures. Measures to implement and manage surface water controls during construction and operation are set out in the **Outline Construction Environmental Management Plan [APP-277]** and the **Flood Risk Assessment and Drainage Strategy [APP-210 to APP-218]** accompanying the Application. The preparation, approval and implementation of the detailed drainage and construction management plans, substantially in accordance with the outline plans, are secured through Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that flood risk mitigation measures are delivered and maintained throughout the lifetime of the Scheme.
Respondents expressed concern for increase flood risk to the Gauze Brook.	An assessment of the effects of the Scheme on watercourses and flood risk, including potential impacts on Gauze Brook, is provided in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [APP-063]**, with supporting detail contained in **ES Volume 3, Appendix 11: Flood Risk Assessment and Drainage Strategy [APP-210 to APP-218]**. The Applicant has undertaken site-specific hydraulic modelling of Gauze Brook and is currently engaging with the Environment Agency through the technical review process. This engagement is reflected in the relevant Statement of Common Ground to be submitted at Deadline 1. The Flood Risk Assessment includes site-specific hydraulic modelling of Gauze Brook to understand existing flood behaviour and to assess potential changes arising from the Scheme. The assessment concludes that, with the proposed drainage design and mitigation in place, the Scheme would not increase the rate or volume of runoff entering Gauze Brook compared to pre-development conditions, and would not increase flood risk to downstream watercourses, infrastructure or communities.

	Measures to control runoff and manage surface water during construction and operation are set out in the **Outline Construction Environmental Management Plan [APP-131]** and the **Flood Risk Assessment and Drainage Strategy [APP-210 to APP-218]**. The preparation, approval and implementation of the detailed drainage and construction management plans, substantially in accordance with **Draft Development Consent Order [APP-016]**, ensuring flood risk to Gauze Brook is appropriately managed throughout the lifetime of the Scheme.
Respondents expressed general concern regarding the potential for contamination arising from the Scheme. Some respondents raised concerns about the use of cleaning products or other chemicals during operation. Some respondents also expressed concern that chemicals contained within the solar panels could leach or leak into the surrounding land.	Potential effects of the Scheme on water quality and contamination risk are assessed in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [APP-063]**, which sets out mitigation and management measures to protect water quality during construction, operation and decommissioning. These measures include pollution prevention controls, containment systems, emergency response protocols, and site-specific drainage measures, particularly around the Battery Energy Storage System (BESS) and substations where lined drainage and automatically actuating valves are proposed. The Applicant notes that it is discussing the approach to pollution resulting from battery fire with both the Environment Agency and the Lead Local Flood Authority (LLFA) and this discussion is set out in the relevant Statements of Common Ground to be submitted at Deadline 1**.** Mitigation measures to control contamination risk during construction and decommissioning are set out in the **Outline Construction Environmental Management Plan [APP-277]** and the **Outline Decommissioning Strategy [APP-279].** Routine maintenance and panel cleaning will use minimal water and no detergents or chemical cleaning agents, in line with industry standards and best practice, so there is no expected risk from cleaning runoff. In addition, the removal of agrichemical inputs through the cessation of farming activities will further reduce contamination risks compared to existing use. The preparation, approval and implementation of a detailed Construction Environmental Management Plan (which must be substantially in accordance with the **Outline Construction Environmental Management Plan [APP-277]**) is secured through Requirement 13 in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that construction works are carried out in accordance with the approved CEMP and that contamination risks are appropriately managed throughout construction of the Scheme.

Respondents expressed concern regarding the potential risk of contamination to groundwater and surface water as a result of the Scheme. Some respondents specifically referred to potential impacts on the water table and nearby waterbodies.	An assessment of potential contamination risks is provided in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [APP-063]** and **ES Volume 1, Chapter 19: Ground Conditions [APP-071]**, which consider risks to surface water, groundwater and sensitive receptors during construction, operation and decommissioning of the Scheme. These assessments conclude that, with appropriate mitigation and management measures in place, no significant contamination effects are anticipated. The Applicant notes that the approach to assessment of risk to groundwater and surface water arising from the Scheme has been agreed with Wiltshire Council and is currently being discussed with the Environment Agency. These discussions are set out in the relevant Statement of Common Ground with Wiltshire Council to be submitted at Deadline 1 and in the relevant Statement of Common Ground with the Environment Agency which will be submitted at a later Deadline. Mitigation and management measures to protect groundwater and surface water are set out in the **Outline Construction Environmental Management Plan [APP-277]** and supporting management plans. These include pollution prevention controls, containment measures, emergency response procedures, and site-specific drainage design. In particular, drainage within substation and Battery Energy Storage System (BESS) areas will incorporate lined drainage and automatically actuating shut-off valves to contain any accidental spills or firewater, preventing release to surrounding land or watercourses. Routine maintenance and panel cleaning will use minimal water and will not require detergents or chemical cleaning products, in line with standard industry practice, meaning there is no expected risk of chemical runoff from panel washing. In addition, the cessation of agricultural activity within the Solar PV Sites will remove routine inputs of fertilisers, pesticides and herbicides, thereby reducing existing sources of diffuse contamination. The preparation, approval and implementation of the detailed CEMP, substantially in accordance with the outline plan, is secured through Requirement 13 in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that contamination risks are appropriately managed throughout construction, operation and decommissioning of the Scheme.
Cultural Heritage	

Respondents expressed general concern regarding the potential effects of the Scheme on cultural heritage and the historic environment. Some respondents raised specific concerns in relation to potential impacts on Roman and medieval heritage assets.	The potential effects of the Scheme on cultural heritage, including archaeological assets dated to the Roman and medieval periods, are fully assessed in **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, supported by detailed technical appendices in **ES Volume 3, Appendices 12-1 to 12-8 [APP-219 to APP-232]**. The chapter considers baseline conditions, identifies built and archaeological heritage assets within the study area, and assesses likely effects during construction, operation and decommissioning, including effects on setting. The chapter concluded that, following mitigation, the residual effects on any archaeological assets including Roman and medieval period remains, would be neutral/negligible and therefore not significant (see **Volume 3, Appendix 12-8 Cultural Heritage Impact Assessment Tables [APP-232]**). The assessment is underpinned by extensive desk-based research, geophysical survey and evaluation trenching, as detailed in **ES Volume 3, Appendix 12-2: Archaeological Desk-Based Assessments [APP-220] and [APP-221]**, **Appendix 12-4: Archaeological Geophysical Survey Reports [APP-223] and [APP-224]**, and **Appendix 12-5: Interim Evaluation Trial Trenching Reports [APP-225] to [APP-229]**. The Applicant notes that the approach to the assessment has been agreed with Wiltshire Council and the methodology for the mitigation strategy is being discussed with Wiltshire Council and is set out in the relevant Statement of Common Ground to be submitted at Deadline 1**.** Embedded mitigation measures to avoid or reduce harm to heritage assets are set out in Section 12.9 of **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, with additional mitigation measures detailed in Section 12.11. An overarching archaeological mitigation strategy is provided in **ES Volume 3, Appendix 12-6: Outline Archaeological Mitigation Strategy [APP-230]**, which sets out the framework for further archaeological investigation, recording and protection where ground disturbance cannot be avoided. The preparation, approval and implementation of detailed archaeological Written Schemes of Investigation for each part of the Proposed Development, substantially in accordance with **Appendix 12-6 Outline Archaeological Mitigation Strategy [APP-230]**, are secured through Requirement 12 of Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that appropriate protection, recording and mitigation are delivered during the relevant part of the Proposed Development.

Respondents expressed concern regarding the potential effects of the Scheme on listed buildings.	The potential effects of the Scheme on listed buildings and other built heritage assets are assessed in **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, supported by **ES Volume 3, Appendix 12-1: Heritage Statement [APP-219]**. The assessment identifies baseline heritage assets, considers their significance, and evaluates likely effects during construction, operation and decommissioning, including effects on setting. The assessment concludes that no direct physical impacts to listed buildings are required to facilitate the Scheme. Any identified effects on listed buildings are indirect and relate to changes in elements of their setting that contribute to their significance. After mitigation, residual effects to the setting of the listed buildings range between Neutral and Minor/Moderate Adverse, and therefore not significant (see **Volume 3, Appendix 12-8 Cultural Heritage Impact Assessment Tables [APP-232]**). The Applicant notes that the approach to the assessment in relation to heritage assets (including designated assets) has been agreed with Historic England and Wiltshire Council and is set out in the relevant Statements of Common Ground to be submitted at Deadline 1**.** Embedded mitigation measures to avoid or reduce harm are set out in Section 12.9 of **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**.
Respondents expressed general concern regarding the potential effects of the Scheme on archaeology, including the risk of damage to archaeological sites.	The potential effects of the Scheme on archaeological assets are fully assessed in **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, supported by detailed technical appendices in **ES Volume 3, Appendices 12-2 to 12-5 [APP-220 to APP-229]**. The assessment considers baseline archaeological conditions, identifies known and potential archaeological assets within the study area, and evaluates likely effects during construction, operation and decommissioning. The chapter concluded that, following mitigation, the residual effects on any archaeological assets, would be neutral/negligible and therefore not significant (see **Volume 3, Appendix 12-8 Cultural Heritage Impact Assessment Tables [APP-232]**). The assessment is informed by desk-based research, geophysical surveys and evaluation trenching, which have been undertaken to identify areas of archaeological potential and to refine the Scheme design where practicable to avoid harm. Where impacts cannot be avoided, embedded mitigation measures are set out in Section 12.9 of **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, with additional mitigation detailed in Section 12.11. The Applicant notes that the approach to the assessment in relation to archaeological sites has been agreed with Historic England and Wiltshire Council and the methodology for the mitigation strategy is under discussion and is set out in the relevant Statements of Common Ground to be submitted at Deadline 1**.**

	An overarching archaeological mitigation strategy is provided in **ES Volume 3, Appendix 12-6: Outline Archaeological Mitigation Strategy [APP-230]**, which sets out the framework for further archaeological investigation, recording and protection where ground disturbance is required. The preparation, approval and implementation of detailed archaeological Written Schemes of Investigation for each part of the Scheme, substantially in accordance with the **Appendix 12-6 Outline Archaeological Mitigation Strategy [APP-230]**, are secured through Requirement 12 of Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that appropriate protection, recording and mitigation are delivered during the relevant part of the Proposed Development.

Respondents expressed general concern regarding the potential effects of the Scheme on the cultural heritage significance of the Fosse Way, including references to the 'Roman road'.	The potential effects of the Scheme on the cultural heritage of the Fosse Way and associated Roman archaeological assets are fully assessed in **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, supported by detailed technical appendices in **ES Volume 3, Appendices 12-1 to 12-7 [APP-219 to APP-231]**. The assessment identifies known Roman heritage assets, considers their significance, and evaluates likely effects during construction, operation and decommissioning, including effects on setting. Since the design presented at PEIR stage, Field C26, the westernmost part of Field C25, and the majority of Field C13 have been entirely removed from the Order Limits. Solar PV Panels have also been removed entirely from within Fields B1-B5, C24-C25, and C13. A number of fields abutting the Fosse Way within which Solar PV Panels will be erected have had offsets established with their boundaries with Fosse Way, including Fields B6, C10-C12, and C22-C23. **Appendix 12.1: Heritage Statement [APP-219]** identified that the overall setting and significance of the Fosse Way will remain intact, and the asset will retain its legibility as a roadway within a largely agrarian landscape. Consequently, no significant effects were identified to the asset. Embedded mitigation measures to avoid or reduce harm to heritage assets are set out in Section 12.9 of **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, with additional mitigation detailed in Section 12.11. An overarching archaeological mitigation strategy is provided in **ES Volume 3, Appendix 12-6: Outline Archaeological Mitigation Strategy [APP-230]**. The Applicant notes that the approach to the assessment in relation to the Fosse Way has been agreed with Historic England and the methodology for the mitigation strategy is under discussion with Historic England and is set out in the relevant Statement of Common Ground to be submitted at Deadline 1.
Respondents expressed concern regarding the potential visual effects of the Scheme on the Fosse Way, including impacts on its setting.	The landscape and visual effects of the Scheme, including effects on the Fosse Way and its setting, are assessed in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**. The Landscape and Visual Impact Assessment (LVIA) identifies users of the Fosse Way as visual receptors and evaluates likely effects during construction, operation and decommissioning using realistic worst-case design parameters. The Fosse Way runs adjacent to Sites B and C through the Scheme and is made of seven separate receptors which have been assessed in full. The Sequential effects for users of the Fosse Way are not considered to be any greater than those effects identified for the individual sections as set out within **ES Volume 3, Appendix 8.3 ES LVIA Assessment Sheets [APP-189-194]**. Moderate Adverse

	effects on Receptor No TR145: Fosse Way were identified as a result of Site C with no greater effects identified as a result of Site B. Refer to **ES Chapter**, **Appendix 8-3-2-2-1 - Landscape and Visual Assessment Sheets [APP-191].** The assessment found that there would be temporary Moderate Adverse effects during the construction and Year 1 on views from The Fosse Way which would reduce Minor at Year 15 and No effect at Decommissioning as a result of the proposed mitigation planting. The Scheme design has been refined through an iterative design process to avoid and reduce visual effects on the Fosse Way. This includes the removal of solar panels from fields adjacent to the Fosse Way where significant visual effects were identified, together with the introduction of landscape buffers and new planting to further reduce visibility of infrastructure from the route and its surrounding landscape. Details of the proposed landscape mitigation measures are set out in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060], ES Volume 2, Figure 3-4-1 to 3-4-5.2 Landscape and Ecology Mitigation Plan [APP-084]** the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283],** and the **Outline Ecological Protection and Mitigation Strategy (OEPMS) [APP-284]**. The preparation, approval and implementation of detailed landscape and ecological management plans, (substantially in accordance with the **OLEMP**) and a detailed ecological protection and mitigation strategy (substantially in accordance with the **OEPMS**) are secured through Requirements 7 and 8 respectively in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that visual mitigation measures are delivered and maintained throughout the lifetime of the Scheme. The effects of the Scheme on the setting of the Fosse Way as a heritage asset are assessed in **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, which concludes that, with the design refinements and secured mitigation in place, effects on the setting of the Fosse Way are appropriately managed and no significant effects were identified to the asset. Since the design presented at PEIR stage, Field C26, the westernmost part of Field C25, and the majority of Field C13 have been entirely removed from the Order Limits. Solar PV Panels have also been removed entirely from within Fields B1-B5, C24-C25, and C13. A number of fields abutting the Fosse Way within which Solar PV Panels will be erected have had offsets established with their boundaries with Fosse Way, including Fields B6, C10-C12, and C22-C23. **Appendix 12.1: Heritage Statement [APP-219]** identified that the overall setting and significance of the Fosse Way will remain intact, and the asset will retain its legibility as a roadway within a largely agrarian landscape. .

	The Applicant notes that the approach to the assessment in relation to the Fosse Way has been agreed with Historic England and the methodology for the mitigation strategy is under discussion with Historic England and is set out in the relevant Statement of Common Ground to be submitted at Deadline 1.
Respondents expressed concern regarding the potential effects of construction traffic on the Fosse Way.	The potential effects of construction traffic on the local highway network, including the Fosse Way, are assessed in **ES Volume 1, Chapter 13: Transport and Access [APP-065]**. The assessment considers construction vehicle routing, traffic volumes, road safety and effects on road users, and concludes that, with appropriate mitigation in place, construction traffic would not give rise to unacceptable impacts on the operation or safety of the Fosse Way. Construction vehicle movements will be managed through a Construction Traffic Management Plan. An **Outline Construction Traffic Management Plan (Outline CTMP) [APP-287]** has been prepared and submitted with the Application. The Outline CTMP sets out measures to ensure that the effect of construction traffic on the local highway network is minimised, including defined construction access points, approved HGV routes, coordination of deliveries, and timing restrictions to avoid peak traffic periods where practicable. The Outline CTMP also includes a road condition and dilapidation survey of minor roads not typically used by HGV traffic. Any damage to verges or carriageway surfaces caused by construction vehicles will be rectified to the satisfaction of the local highway authority. In addition, the Outline CTMP includes community liaison measures to keep local communities informed of construction activity and to provide a contact point for feedback should any issues arise. The preparation, approval and implementation of the detailed CTMP, substantially in accordance with the Outline CTMP, are secured through Requirement 15 of Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring construction traffic effects on the Fosse Way are appropriately managed throughout the construction phase.
Air Quality	
Respondents expressed general concern regarding the potential effects of the Scheme on air quality, including the risk of increased pollution.	An assessment of the effects of the Scheme on air quality (including the risk of increased pollution) is provided in **ES Volume 1, Chapter 15: Air Quality [APP-067]**, which considers potential air quality impacts during construction, operation and decommissioning. The assessment examines dust emissions, vehicle emissions, non-road mobile machinery

	emissions, back-up generator emissions and emissions associated with a the unlikely event of a potential BESS fire. Supporting technical assessments are provided in **ES Volume 3, Appendix 15-1: Construction Dust Methodology and Assessment [APP-238]** and **ES Volume 3, Appendix 15-2: BESS Fire Emissions Modelling [APP-239]**. The assessment concludes that, with embedded mitigation measures in place, the Scheme would not give rise to significant adverse air quality effects at human or ecological receptors. Mitigation measures to control construction dust, vehicle emissions and plant emissions are set out in the **Outline Construction Environmental Management Plan [APP-277]**, which includes measures such as dust suppression and site management controls. Additional measures to control construction vehicle emissions are set out in the **Outline Construction Traffic Management Plan [APP-287],** which includes restrictions on construction traffic routing and timing. Measures to control operational emissions, including maintenance activities and back-up generator testing, are set out in the **Outline Operational Environmental Management Plan [APP-278]**. In the unlikely event of a BESS fire, measures to control fire emissions are outlined in the **Outline Battery Safety Management Plan [APP-286].** This includes measures to limit human exposure to air pollution in the event of a fire. The preparation, approval and implementation of the detailed Construction Environmental Management Plan, Construction Traffic Management Plan, Operational Environmental Management Plan and Battery Safety Management Plan, substantially in accordance with the outline plans, are secured through requirements in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that air quality impacts are appropriately controlled throughout the construction and operation of the Scheme.
Respondents raised concerns around the potential for toxic fumes in the event of a BESS fire and how that might impact nearby resident.	As a result of updated Scheme design for DCO submission, BESS infrastructure is proposed more than 500 m away from the nearest dwelling. At this distance, impact to health and wellbeing from air quality, fire or explosion impacts are minimal. As such, there are no significant adverse effects to human health anticipated as a result of the Scheme, as assessed in **ES Volume 1, Chapter 18: Human Health [APP-070]**. The location of the BESS has been informed by a detailed site selection and design evolution process, as set out in **ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP-056]**. This chapter explains that land at Lime Down D was identified as an appropriate location for the BESS due to its proximity to the solar PV arrays and the on-site substation, providing operational benefits including minimising transmission losses, maximising storage efficiency,

	and enabling rapid and reliable grid response. In considering options for co-locating the BESS with the solar PV Sites, Lime Down D was selected as the preferred location due to its central position within the Scheme, effective natural and proposed screening, limited proximity to residential properties, and closeness to existing infrastructure corridors, including the railway line. Locating the BESS within an existing infrastructure corridor reduces the need for additional land take and avoids introducing new isolated infrastructure into undeveloped areas. The assessment concludes that siting the BESS at Lime Down D presents the lowest potential for significant adverse environmental effects. Accordingly, the proximity of the BESS to the railway line does not give rise to significant safety or environmental concerns. The potential effects of toxic gases arising in the unlikely event of a BESS fire, are assessed in **ES Volume 1, Chapter 15: Air Quality [APP-067]**, which models potential emissions and evaluates impacts on sensitive receptors within a 1 km radius of the BESS area, including residential properties and Public Rights of Way. The assessment concludes that no significant off-site air quality impacts are predicted should a fire event occur. In the unlikely event of a fire, the precautionary measures set out in the **Outline Battery Safety Management Plan [APP-286]**, such as advice to remain indoors and close windows, would further reduce potential effects on nearby residents. The Applicant has followed guidance from the National Fire Chiefs Council (NFCC) and commissioned a Plume Assessment Study to model toxic gas emissions and visibility impacts from a BESS fire on all sensitive receptors within a 1km radius of the BESS area (**ES Volume 3, Appendix 15-2: BESS Fire Emissions Modelling [APP-239])**. The fire emissions modelled in the report were based upon recent UK Health Security Agency (UKHSA) requests for DCO BESS projects which explore both immediate air quality impacts together with annual UK air quality requirements. Six worst case BESS fire locations (i.e. locations within the BESS Area closest to sensitive receptors) have been modelled as depicted in **ES Volume 2, Figure 15-5: Battery Energy Storage System Fire Emissions [APP-166]**. The Concentrations of carbon monoxide (CO), formaldehyde, hydrogen chloride (HCl), hydrogen cyanide (HCN), hydrogen fluoride (HF), ammonia (NH_3), nitrogen dioxide (NO2) and particulates from a potential BESS fire have been modelled using an air quality dispersion model to determine the likely effects on human health. A high-level visibility assessment has also been undertaken using the modelled particulates results to determine the effect of BESS fire emissions on visibility on the local road and rail network to inform the **Outline Battery Safety Management Plan (OBSMP) [APP-286]**. The Plume Assessment Study has concluded that there are no significant toxic emission or visibility impacts at all sensitive receptor locations. The Applicant has also committed to commissioning an additional Plume Analysis Study at the detailed design stage of the project as stipulated in Section 5.5.9 of the OBSMP and secured through Requirement 6 of the **Draft DCO [APP-016]**.

	As now mandated under National Fire Protection Association (NFPA) 855 (2026), the Applicant will only be able to select a BESS system that has undertaken Large Scale Fire Testing (LSFT). At the detailed design stage, the selected BESS LSFT data will be leveraged to fully inform inputs for risk assessment tools which will be utilised together with detailed consequence modelling to provide a comprehensive site operations and emergency response safety audit – this is secured in the OBSMP via pre-construction requirements. Section 5 of the OBSMP covers all requisite firefighting requirements for the Scheme, including fire service access, firefighting water supply, and emergency planning requirements. The Applicant notes that the approach to BESS safety is under discussion with Dorset & Wiltshire Fire & Rescue Service (D&WFRS) and this will be set out in the relevant Statement of Common Ground.
Respondents expressed concern regarding potential impacts on air quality arising from construction activities, including construction dust and construction vehicle emissions.	An assessment of the effects of construction activities on air quality is provided in **ES Volume 1, Chapter 15: Air Quality [APP-067]**. The assessment considers potential emissions from construction dust, construction vehicle exhausts and Non-Road Mobile Machinery (NRMM), and has been undertaken in accordance with relevant best practice guidance. Further detail on the construction dust assessment is provided in **ES Volume 3, Appendix 15-1: Construction Dust Methodology and Assessment [APP-238]**. The assessment concludes that, with embedded mitigation measures in place, construction-phase air quality effects on receptors would not be significant. Mitigation measures to control dust and emissions during construction are set out in the **Outline Construction Environmental Management Plan [APP-277]** and the **Outline Construction Traffic Management Plan [APP-287]**. These include measures such as dust suppression, site management controls, routing and scheduling of construction traffic, and management of plant and machinery. The preparation, approval and implementation of detailed construction management plans, substantially in accordance with the outline plans, are secured through Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that air quality impacts during construction are appropriately controlled.
Noise and Vibration	
Respondents expressed general concern regarding the potential for increased noise, including references to 'buzzing', and vibration arising from the Scheme.	An assessment of the effects of the Scheme on noise and vibration is provided in **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**, with supporting technical information supplied in **ES Volume 3, Appendix 14-4: Noise Modelling [APP-237]**. The assessment considers potential noise and vibration impacts during construction, operation and decommissioning,

Some respondents raised concerns regarding noise and vibration from specific components of the solar park, including the BESS.	including from solar PV panels and associated infrastructure. The conclusions of the assessment in relation to each phase of the Scheme are set out below. The conclusions of the assessments are made for the Scheme as a whole (i.e. all of its components combined, including the BESS), and therefore any specific component will not have any greater effects than those that have been assessed. The Applicant notes that the approach to noise and vibration has been discussed with Wiltshire Council, as described in Section 14.2 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**. In addition, further meetings have been held over the approach to the management plans, and a Statement of Common Ground will be issued and updated throughout examination Construction phase The noise and vibration impacts arising from construction activities are assessed in Section 14.10 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**. For the purposes of the assessment, a reasonable worst-case scenario assuming piling activities has been considered. Mitigation measures associated with construction activity, such as temporary screens and advanced warning of works, are presented in Section 14.9 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]** and are committed to through the **Outline Construction Environmental Management Plan [APP-277]**. With these measures in place, the assessment concludes that no significant effects from construction noise or vibration are expected. A noise monitoring programme agreed with Wiltshire Council will be carried out during construction, as committed to in the **Outline Construction Environmental Management Plan [APP-277]**. The preparation, approval and implementation of the Construction Environmental Management Plan, substantially in accordance with the **Outline CEMP [APP-277]**, is secured through Requirement 13 in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that construction noise and vibration effects are appropriately controlled. Operational phase The noise impacts from the operation of the Scheme and its components are assessed in Section 14.10 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**, with supporting modelling provided in **ES Volume 3, Appendix 14-4: Noise Modelling [APP-237]**. The predicted noise levels from the Solar PV Sites have been artificially increased by 3 dB to account for the increased likelihood that the noise from the Scheme would be perceived as distinct from the existing background sound. Potential mitigation measures are detailed in Section 14.9 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**, and with such measures in place, significant effects from operational noise are not expected.

	The **Outline Operational Environmental Management Plan [APP-278]** commits to noise levels from the Scheme at residential dwellings being the same as or below those modelled in the ES. This provides assurance that significant effects from operational noise will be avoided, while allowing flexibility in how this is achieved. The preparation, approval and implementation of the detailed OEMP, substantially in accordance with the outline plan, are secured through Requirement 14 of Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring operational noise is appropriately controlled throughout the lifetime of the Scheme.
Respondents expressed concern regarding potential increases in noise and vibration arising from construction activities associated with the Scheme.	The noise and vibration impacts arising from construction activities are assessed in Section 14.10 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**, with supporting technical information provided in **ES Volume 3, Appendix 14-4: Noise Modelling [APP-237]**. For the purposes of the assessment, a reasonable worst-case scenario assuming piling activities has been considered. The Applicant notes that the approach to construction noise and vibration has been discussed with Wiltshire Council, as described in Section 14.2 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**. Mitigation measures associated with construction activity are presented in Section 14.9 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]** and are committed to through the **Outline Construction Environmental Management Plan [APP-277]**. With these measures in place, the assessment concludes that no significant effects from construction noise or vibration are expected. A noise monitoring programme agreed with Wiltshire Council will be carried out during construction. The preparation, approval and implementation of the Construction Environmental Management Plan, substantially in accordance with the **Outline CEMP [APP-277]**, are secured through Requirement 13 in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that construction noise and vibration are appropriately controlled throughout the construction phase of the Scheme.
Transport and Access	

Respondents expressed concern that the Scheme would increase traffic and cause disruption to the local road network during the construction phase.	The potential effects of construction traffic on the local highway network are assessed in **ES Volume 1, Chapter 13: Transport and Access [APP-065]**, which considers construction vehicle movements, traffic volumes, road safety and effects on road users. This included the capacity of local roads and infrastructure to accommodate construction vehicles with consideration of construction traffic volumes, vehicle types, route suitability, and network performance. The assessment concludes that the level of construction traffic associated with the Scheme is unlikely to materially affect road safety on links within the Study Area, and no significant adverse effects on accident risk are anticipated. The assessment additionally concludes that with appropriate mitigation such as the Construction Traffic Management Plan in place to manage construction vehicle movements, there would be no significant adverse impacts on the local highway network during the construction, operation maintenance, and decommissioning phases of the Scheme. An **Outline Construction Traffic Management Plan (CTMP) [APP-287]** has been prepared and submitted with the DCO application. The aim of the CTMP is to ensure that the effect of the construction phase on the local highway network is minimised. The **Outline CTMP [APP-287]** secures measures to coordinate construction deliveries by HGVs to arrive and depart between 09:30 and 16:30 where possible, to avoid peak network hours of 08:00–09:00 and 17:00–18:00. It also includes a community liaison element to keep local communities informed about the construction process and to provide a contact for feedback should any issues arise. Compliance with the CTMP will be monitored by the Developer, Contractor and Wiltshire Council as local highway authority. The preparation, approval and implementation of the final CTMP, substantially in accordance with the outline CTMP, are secured through Requirement 15 of Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring construction traffic impacts are appropriately managed throughout the construction phase of the Scheme.

Respondents expressed concern for increased traffic during the operational phase of the Scheme.	The potential effects of operational traffic on the local highway network are assessed in **ES Volume 1, Chapter 13: Transport and Access [APP-065]**. This chapter is supported by **ES Volume 2 Figures, including ES Volume 2, Figure 13-13: Operational Only Access Locations: Solar PV Sites [APP-3]**, and **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233].** The assessment considers day-to-day movements associated with maintenance and security of the Scheme, and for the replacement of Solar PV Panels, Conversion Units and BESS Batteries. Assumptions have been made based on similar projects, and the number of vehicle trips for replacement activities will be less than those during the construction phase. The assessment concludes that operation and maintenance vehicles will not give rise to any residual significant effects in terms of traffic volumes, in line with relevant thresholds set out in the ISEP Guidelines 2023. Embedded mitigation measures include providing suitable access points for operation and maintenance phase vehicles with turning areas and this is secured in the **Outline Construction Traffic Management Plan (CTMP) [APP-287]** at Table 2: Solar PV Sites - Access Points.. Where replacement activities are required, measures set out in the **Outline Construction Traffic Management Plan (CTMP) [APP-287], as stated in Section 7 under the heading Operational Traffic Management Plan (OTMP),** will be implemented as appropriate. An example of these measures include: • a review of all proposed routes and measures set out in the CTMP to ensure they remain suitable at the time of replacement activity; and • where practicable, vehicles bringing new replacement Solar PV Panels and BESS Containers to the Order Limits will also transport the replaced Solar PV Panels and BESS Containers out of the Order Limits. In addition, the **Outline Public Right of Way (PRoW) and Permissive Paths Management Plan [APP-288]** includes measures at section 4 of the report to manage vehicle interactions with PRoW users and minimise effects on existing users. Measures include all PRoW will have a 15m buffer to any infrastructure associated with the Scheme (including fencing). Operation and maintenance vehicles may cross PRoW during visits on an infrequent basis. During the operation and maintenance phase, there are anticipated to be around five visits to each Solar PV Site per month for

	maintenance purposes. These would typically be made by light van or 4x4 type vehicles. These movements will not generate any material effect on PRoW, however, in the unlikely circumstance that there is damage to the surface of the PRoW, it will be repaired as soon as practicable and returned to its previous condition. Not all of these visits will require vehicles to cross a PRoW The **Outline Public Right of Way (PRoW) and Permissive Paths Management Plan [APP-288]** includes additional proposed permissive paths. The permissive paths are to remain open up to 365 days per year throughout the proposed 60-year operational lifetime of the Scheme. The preparation, approval, and implementation of the final CTMP and PRoW and Permissive Paths Management Plan are secured through Schedule 2, Requirements 15 and 16, respectively, of the **Draft Development Consent Order [APP-016]**.
Respondents expressed concern that construction vehicles, including HGVs and Abnormal Indivisible Loads (AILs), could cause damage to local roads. Some respondents also queried whether any damage arising from construction traffic, including potholes, would be repaired.	The effects of construction traffic on the local highway network are assessed in **ES Volume 1, Chapter 13: Transport and Access [APP-065]**, which considers construction vehicle routing, traffic volumes and potential impacts on highway safety and road condition. The assessment concludes that, with appropriate management measures in place, construction traffic effects can be appropriately controlled and through road condition surveys pre and post construction, any damage caused to the highway by the construction vehicles will be rectified as set out in Section 6.12 of the **Outline Construction Traffic Management Plan (CTMP) [APP-287]**. Mitigation measures to manage construction traffic and protect local roads are set out in the **Outline Construction Traffic Management Plan (CTMP) [APP-287]**. The CTMP has been developed to minimise impacts on the local highway network and includes measures for routing, scheduling of deliveries and liaison with the local highway authority. A road condition and dilapidation survey of minor roads not typically used by HGV traffic pre and post construction is committed to within the CTMP. The CTMP will also secure, as set out in the outline CTMP, that any damage to verges or carriageway surfaces caused by construction vehicles will be rectified to the satisfaction of the local highway authority.

	The preparation, approval and implementation of the final CTMP, substantially in accordance with the outline CTMP, are secured through Requirement 15 of Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring construction traffic impacts, including potential damage to local roads, are appropriately managed throughout the construction phase of the Scheme.
Respondents expressed concern regarding the capacity of the local road network and associated infrastructure to accommodate construction traffic.	The capacity of local roads and infrastructure to accommodate construction vehicles is assessed in **ES Volume 1, Chapter 13: Transport and Access [APP-065]**, which considers construction traffic volumes, vehicle types, route suitability and network performance. The assessment concludes that, with appropriate mitigation in place, there would be no significant adverse impacts on the local highway network and that the network can accommodate construction traffic. Supporting technical information is provided in **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]**, which identifies specific locations where traffic management measures or passing arrangements may be required on narrower sections of construction routes. The assessment presented in **Annex H of ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]** demonstrates adequate carriageway width or frequency of passing place opportunity to pass at least an HGV and a light vehicle as requested in comments provided by Wiltshire Council. All construction routes also include passing points to allow two HGVs to pass. Mitigation measures, including those referenced above, to manage construction traffic are set out in the **Outline Construction Traffic Management Plan (CTMP) [APP-287]**. The CTMP is designed to minimise the effects of construction traffic on local roads and includes measures for vehicle routing, delivery scheduling and liaison with the local highway authority. The preparation, approval and implementation of the final CTMP, substantially in accordance with the outline CTMP, are secured through Requirement 15 of Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring construction traffic impacts on local roads and infrastructure are appropriately managed throughout the construction phase of the Scheme.

Respondents expressed safety concerns regarding an increased risk of accidents and injury as a result of construction vehicles and increased traffic associated with the Scheme.	The potential effects of construction traffic on highway safety and accident risk are assessed in **ES Volume 1, Chapter 13: Transport and Access [APP-065]**, which considers changes in traffic flows, HGV movements and accident risk on the local road network. Links experiencing traffic increases above defined assessment thresholds were taken forward for detailed analysis. Supporting technical evidence is provided in **ES Volume 3, Appendix 13-1: Transport Assessment [APP-233]**, which includes an assessment of baseline accident data and predicted changes in collision risk arising from construction traffic. The assessment concludes that the level of construction traffic associated with the Scheme is unlikely to materially affect road safety on links within the Study Area, and no significant adverse effects in relation to accident risk are anticipated. Mitigation measures to manage construction traffic safely are set out in the **Outline Construction Traffic Management Plan [APP-287]**, which includes defined vehicle routing, delivery scheduling and coordination with the local highway authority. The preparation, approval and implementation of the final CTMP, substantially in accordance with the outline CTMP, are secured through Requirement 15 of Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring construction traffic is managed safely (with accident risks minimised) throughout the construction phase of the Scheme.
Respondents expressed concern regarding increased noise arising from construction vehicles and associated traffic.	The noise effects associated with construction traffic are assessed in **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**, which considers noise from construction vehicles, HGV movements and associated changes in traffic flows on the local road network. Supporting technical information is provided in **ES Volume 3, Appendix 14-4: Noise Modelling [APP-237]**. The assessment concludes that, with embedded mitigation in place, noise effects from construction traffic would be negligible or low in magnitude and no significant adverse effects at any receptors are predicted. The Applicant notes that the approach to construction noise and vibration has been discussed with Wiltshire Council, as described in Section 14.2 of **ES Volume 1, Chapter 14: Noise and Vibration [APP-066]**. Mitigation measures to manage construction traffic and minimise associated noise are set out in the **Outline Construction Traffic Management Plan [APP-287]**, which includes defined vehicle routing, delivery scheduling and coordination with the local highway authority to reduce impacts on sensitive receptors.

	The preparation, approval and implementation of the final CTMP, substantially in accordance with the outline CTMP, are secured through Requirement 15 of Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring construction traffic noise is appropriately managed throughout the construction phase of the Scheme.
Respondents expressed concern regarding potential impacts on air quality arising from emissions associated with construction vehicles.	The effects of construction activities on air quality, including emissions from construction vehicles, construction dust and Non-Road Mobile Machinery (NRMM), are assessed in **ES Volume 1, Chapter 15: Air Quality [APP-067]**. The assessment has been undertaken in accordance with best practice guidance and considers sensitive receptors within the Study Area. The assessment concludes that, with embedded mitigation in place, air quality effects on receptors arising from construction traffic and construction activities would not be significant. Mitigation measures to minimise emissions and dust during construction are set out in the **Outline Construction Environmental Management Plan [APP-277]** and the **Outline Construction Traffic Management Plan [APP-287]**. These include measures to control construction vehicle movements, manage site access, reduce dust generation and ensure appropriate maintenance of construction plant and vehicles. The preparation, approval and implementation of the detailed Construction Environmental Management Plan and detailed Construction Traffic Management Plan, substantially in accordance with the corresponding outline plans, are secured through Requirement 13 and Requirement 15, respectively, in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring air quality impacts during construction are appropriately controlled throughout the construction phase of the Scheme.
Socio-Economics, Tourism and Recreation	

Respondents expressed general concern regarding the potential effects of the Scheme on the local economy and local businesses. Some respondents considered that the Scheme would not deliver meaningful socio-economic or economic benefits.	An assessment of the likely effects of the Scheme on the local economy and employment is provided in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]**. This chapter considers potential impacts on construction and engineering sectors, agricultural activity, tourism-related businesses, and wider local economic conditions during construction, operation and decommissioning. Supporting evidence is provided in **ES Volume 3, Appendix 16-3: Socio-Economics, Tourism and Recreation – Summary of Non-Significant Effects [APP-239]**, which summarises that effects on the local economy and economic prosperity are assessed as negligible to minor beneficial, with construction expenditure and employment generation contributing positive, temporary effects on local economic activity. The assessment therefore concludes that the Scheme would not result in significant adverse effects on local businesses or the wider local economy, and that socio-economic benefits, including job creation and local supply-chain opportunities, are expected during the construction phase, with more modest economic and skills and supply chain opportunities during the operational phase. The Applicant has sought to minimise long-term adverse effects on local businesses through the mitigation measures set out in the **Outline Operational Environmental Management Plan (Outline OEMP) [APP-278]**, **Outline Construction Traffic Management Plan (Outline CTMP) [APP-287]**, and **Outline Public Rights of Way and Permissive Paths Management Plan (Outline PROWPPMP) [APP-282]**, secured respectively by Requirements 14, 15, and 16 in Schedule 2 to the **Draft DCO [APP-016]**. The Applicant is furthermore committed to skills, employment and business enhancement measures as set out in the **Outline Skills, Supply Chain and Employment Plan (OSSCEP) [APP-285]**, secured by Requirement 18 in Schedule 2 to the **Draft DCO [APP-016]**, to help increase business activity and local skill capabilities in Wiltshire during the operational lifetime of the Scheme. The Applicant notes that the approach to assessment of socio-economic effects has been agreed with Wiltshire Council's Economics and Regeneration Team, with the exception of matters relating to agricultural employment, which is still under discussion and is set out in the relevant Statement of Common Ground to be submitted at Deadline 1**.**

Respondents expressed general support for the socio-economic and economic benefits of the Scheme.	The Applicant agrees with and takes note of this comment. The Applicant confirms that the socio-economic benefits are set out in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068].**
Respondents expressed concern that the Scheme could have an adverse effect on local property values.	Impacts of the Scheme on property prices have not been assessed as these have been agreed by the Planning Inspectorate to be scoped out of assessment in the ES, as set out in **ES Volume 3, Appendix 1-2: Scoping Opinion Response Table [APP-181].**

Respondents expressed concern for the Scheme's impact to property prices during the pre-application / development phase. Some respondents expressed that they have been unable to sell their properties as a result of the proposals.	Impacts of the Scheme on property prices have not been assessed as these have been agreed by the Planning Inspectorate to be scoped out of assessment in the ES, as set out in **ES Volume 3, Appendix 1-2: Scoping Opinion Response Table [APP-181].** Whilst property values are not a material planning consideration and are therefore not assessed in the ES, the potential effects of the Scheme on residential receptors have been assessed where relevant, including through the Landscape and Visual Impact Assessment (LVIA) presented in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]**. The LVIA assesses effects on residential properties and identifies where significant visual effects may occur. The assessment concludes that there would be no Significant Long Term Visual Effects to Residential Properties as a consequence of the Scheme. The layout of the Scheme has been refined through an iterative design process to minimise effects on nearby properties. This includes embedded mitigation measures such as retaining existing hedgerows and woodland, providing new planting and landscape buffers, and incorporating minimum offsets from residential properties within the design.
Respondents expressed support for the jobs the Scheme would create.	The Applicant agrees with and takes note of this comment. The Applicant confirms that the socio-economic benefits including job creation are set out in **ES Volume 1, Chapter 16: Socioeconomics, Tourism and Recreation [APP-068]** and are supported by the measures secured in the **Outline Skills, Supply Chain and Employment Plan [APP-285]**.

Respondents expressed scepticism about the number of jobs the Scheme would create.	An assessment of the Scheme's employment effects is provided in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]**, which considers job creation during construction, operation and decommissioning, and the contribution of the Scheme to local and regional labour markets. A full breakdown of estimated employment figures for each phase of the Scheme's lifetime is provided in Section 1.4 of **ES Volume 3, Appendix 16-1: Socio-Economics, Tourism and Recreation – Legislation, Policy, Guidance and Supporting Information [APP-240]**. This supporting information sets out the methodology used to derive employment estimates and the anticipated scale of direct and indirect job creation. The socio-economic assessment concludes that the Scheme would generate temporary employment during construction, smaller-scale long-term operational employment, and opportunities for local supply-chain involvement. The Applicant notes that the approach to employment is under discussion with Wiltshire Council's Economics and Regeneration Team and is set out in the relevant Statement of Common Ground to be submitted at Deadline 1**.**
Respondents expressed concern regarding the potential effects of the Scheme on agricultural employment and tenant farmers. Some respondents specifically raised concerns about potential job losses for agricultural workers and tenant farmers as a result of agricultural land being included within the Scheme.	The Applicant is cognisant of the impact the Scheme could have on wider agricultural employment associated with tenancies and contracts and so seeks to source ways of retaining agricultural workers, providing reskilling opportunities, or providing re-employment as supported by the measures secured in the **Outline Skills, Supply Chain and Employment Plan [APP-285].** The Applicant has been in discussions with landowners and these discussions have included arrangements regarding existing tenancies. Whilst a worst case could involve the termination of an agricultural tenancy or contract in its current form, alternative operational and management opportunities are available connected to the scheme should consent be granted.

Respondents expressed concern regarding the potential effects of the Scheme on tourism. Some respondents specifically raised concerns that impacts on tourism could result in a loss of trade for local businesses, including the potential closure of businesses reliant on tourism.	The potential effects of the Scheme on tourism and recreation are assessed in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]**, supported by **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]**. The assessment considers baseline tourism activity, visitor attractions, recreational assets and tourism-dependent businesses within the study area. The assessment evaluates potential effects on the use, enjoyment and desirability of nearby tourism destinations, including impacts on individual visitor attractions, recreational routes, events and businesses reliant on tourism. It also considers whether changes to landscape character or visual amenity could influence visitor behaviour. The assessment identifies a worst-case scenario in which a temporary loss of up to 50 tourism-related jobs could occur locally during construction, and a long-term loss of up to 11 tourism-related jobs could occur during the operational phase of the Scheme. This represents a precautionary estimate based on conservative assumptions. The assessment concludes that, while some localised effects on tourism receptors are anticipated to occur, significant adverse effects on the wider tourism economy are not anticipated. These findings are fully reported in the ES and will be weighed in the planning balance alongside the Scheme's wider economic and environmental benefits. The Applicant notes that the approach to assessment of tourism impacts is under discussion with Wiltshire Council's Economic and Regeneration Team and is set out in the relevant Statement of Common Ground to be submitted at Deadline 1**.**
Respondents expressed concern about the Scheme's impact on horse-riders and bridleways.	Equestrian facilities, including private stables and paddocks, studs, riding schools, and on public rights of way such as bridleways and byways have been considered as specific recreational receptors in the assessment in the **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068].** The likely effects on these locations and receptors are specifically and individually assessed in **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]**. The Applicant confirms that the majority of significant adverse effects can be mitigated, however understands that some **significant adverse effects** to users of routes in Lime Down E cannot be mitigated further during construction. No significant residual effects are anticipated during the operational phase of the Scheme. The Applicant has committed to ensuring the operation or recreational use of equestrian facilities and PROWs is protected as much as possible through the implementation of embedded and additional mitigation measures set out in the **OCTMP [APP-287]** and **OPROWPPMP [APP-282]**, secured respectively by Requirements 15 and 16 in Schedule 2 to the **Draft DCO [APP-016]**.

	The Applicant confirms that the approach to equestrian and PROW impacts is under discussion with Wiltshire Council's Countryside Access Team (as part of discussions with Wiltshire Council in general), the British Horse Society, and the Wiltshire Bridleway Association. Progress on each of these discussions is set out in the relevant Statements of Common Ground with each of these parties to be submitted at Deadline 1.
Respondents raised safety concerns that the Scheme, including construction vehicles associated with it, could endanger horse riders.	Public rights of way such as bridleways and byways and the use of the highway network for recreational users have been considered as specific recreational receptors in the assessment in the **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]**. The likely effects on individual PROWs are specifically assessed in **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241].** The Applicant confirms that the majority of significant adverse effects can be mitigated, however it understands that some **significant adverse effects** to users of routes in Lime Down E cannot be mitigated further during construction. No significant residual effects are anticipated during the operational phase of the Scheme. The Applicant has committed to ensuring the operation or recreational use of PROWs is protected as much as possible through the implementation of embedded and additional mitigation measures set out in the **OCTMP [APP-287]** and **OPROWPPMP [APP-282]**, secured respectively by Requirements 15 and 16 in Schedule 2 to the **Draft DCO [APP-016]**. An assessment on safety and accidents is provided in **ES Volume 1, Chapter 13: Transport and Access [APP-065]**. Links with traffic increases above identified thresholds, were taken forward for further assessment. As part of the assessment, it is concluded that the level of construction traffic associated with the Scheme is unlikely to materially affect road safety on the links in the Study Area. The Applicant confirms that the approach to equestrian and PROW impacts and highway safety are under discussion with Wiltshire Council's Countryside Access Team and Highways Team (as part of discussions with Wiltshire Council in general). Additional discussions specific to PROWs are being undertaken with the British Horse Society, and the Wiltshire Bridleway Association. Progress on each of these discussions is set out in the relevant Statements of Common Ground with each of these parties to be submitted at Deadline 1.

Respondents expressed concern regarding the potential effects of the Scheme on stud farms and other equine businesses in the area.	Equestrian facilities, including private stables, paddocks, stud farms, riding schools, have been considered as specific recreational receptors within **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]**. The likely effects on these receptors are individually assessed in **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]**, which consider impacts from construction activities, traffic, impacts on nearby PROWs and changes in views and landscape character. With the exception of Park Farm, Yatton Keynell (the equestrian facilities of which are likely to be directly affected by cable route construction) the assessment identifies that, with embedded mitigation in place, including construction traffic management, embedded design measures to offset infrastructure from highways and public rights of way, and site-specific safety measures for cabling works, no significant residual effects on the operation or use of equestrian facilities are expected, subject to implementation of the committed mitigation measures.
Respondents expressed concern that construction noise could adversely affect horses at nearby stud farms and other equine businesses.	Equestrian facilities, including private stables and paddocks, studs, riding schools have been considered as specific recreational receptors in the assessment in the **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068].** The likely effects on these locations are specifically assessed in **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]** which identifies no significant residual effects to their operation or recreational use as a result of noise impacts, subject to implementation of embedded and additional mitigation measures with any mitigation requirements (such as noise screening and offsetting away from neighbouring paddocks) secured through the relevant management documents.

Some respondents expressed general concern about the Scheme's potential impact on recreation and access to the countryside. Some respondents raised specific concerns about potential effects on Public Rights of Way (PRoW), permissive paths, footpaths and cycle routes.	A detailed assessment of the likely significance of effects from the Scheme on the use and desirability of individual PRoW and recreational access to the countryside is included in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** and **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]**. This assessment considers the impact on individual recreational routes, including their practical use, enjoyment and desirability. The Applicant confirms that the majority of significant adverse effects can be mitigated. However, some significant adverse effects to users of PRoW and unsurfaced roads in Lime Down E during construction cannot be mitigated further. No significant residual effects are anticipated during the operational phase of the Scheme. The assessment in **ES Volume 1, Chapter 18: Human Health [APP-070]** also considers the physical and mental health impacts of changes to recreation and countryside access under the assessment topic 'open space, leisure and play', and concludes that no significant adverse effects are anticipated at any phase of the Scheme. The Applicant confirms that existing PRoW are to be protected as far as practicable within the Scheme design, with management measures set out in the **Outline Public Rights of Way and Permissive Paths Management Plan (PROWPPMP) [APP-282]**, confirmed as embedded mitigation in Section 16.9 of ES Chapter 16. New permissive access routes have been incorporated into the Scheme design, shown as Work No. 10 on the **Works Plan [APP-007]** and illustrated on **ES Volume 2, Figure 3-4: Landscape and Ecology Mitigation Plan [APP-084]**. These are identified as additional mitigation and enhancement measures in Section 16.11 of ES Chapter 16. The PRoW and Permissive Paths Management Plan is secured through Requirement 16 of Schedule 2 of the **Draft Development Consent Order [APP-016]**. The preparation, approval and implementation of the detailed Construction Environmental Management Plan and Construction Traffic Management Plan, substantially in accordance with the outline plans, are secured through Requirements 13 and 15 respectively in Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring that impacts on PRoW and recreational routes are appropriately managed during construction. The approach to recreation and access has been discussed with Wiltshire Council's Public Health team and is under discussion with Wiltshire Council's Countryside Access Team and is set out in the relevant Statement of Common Ground to be submitted at Deadline 1.
Human Health	

Respondents expressed concern regarding the potential effects of the Scheme on the mental health and wellbeing of the community and local residents. Some respondents also stated that the local area, including access to it, is important for their mental health and wellbeing.	Impacts on mental health and wellbeing are assessed in **ES Volume 1, Chapter 18: Human Health [APP-070]**. This chapter provides a comprehensive assessment of the Scheme's potential effects on human health, including mental health and wellbeing, through consideration of a broad range of health determinants. These include access to open space and recreation, transport and connectivity, community identity and cohesion, employment and income, noise and vibration, air quality, and access to health and social care services. The assessment applies a health "lens" to the findings of relevant technical chapters and concludes that, with the embedded mitigation and additional measures secured through the relevant management plans **[APP-277** to **APP-287]** secured by their respective requirements in Schedule 2 to the **Draft DCO [APP-016]**, the Scheme would not give rise to significant adverse effects on population health, including mental health and wellbeing. Mitigation measures include (but are not limited to) ensuring PROWs remain open as much as is practicable, HGV movements are set to defined routes and within set hours, community liaison and engagement is maintained, and construction impacts on noise and air quality are regulated. With specific regard to community liaison, this is directly secured through Requirement 4 in Schedule 2 to the **Draft DCO [APP-016]** through the provision of a community liaison group. This group will act as an intermediary between the public and the onsite contractors to ensure community concerns and any information they need are communicated and responded to, so as to reduce community anxiety and impacts on mental wellbeing, and to assist in directing the public to mental health support if required. The assessment in **ES Volume 1, Chapter 18: Human Health [APP-070]** focuses on communities within a 2 km Study Area surrounding the Scheme, identified as those most likely to experience potential health-related effects. Baseline analysis demonstrates that rates of poor mental health within the Study Area are generally lower than national averages, and the assessment considers potential pathways by which the Scheme could influence mental wellbeing, including changes to environment, amenity, access and community factors. Residual effects of the Scheme on health following mitigation are assessed as not significant at any phase of the Scheme. Consultation with Wiltshire Council's Public Health Team has informed the approach to mental health considerations, as documented in **ES Volume 3, Appendix 18-1: Human Health Consultation [APP-244].** Through this engagement, the Applicant has committed to signposting locally available mental health and wellbeing resources to members of the public engaging with the Scheme, using information provided by Wiltshire Council's Public Health Team. The Applicant will continue to monitor consultation responses relating to mental health and will provide appropriate signposting to existing local support services where requested. The Applicant notes that the assessment methodology for health and wellbeing has been agreed

	with Wiltshire Council's Public Health team and is set out in the relevant Statement of Common Ground to be submitted at Deadline 1.
Respondents expressed concern regarding the potential effects of the Scheme on human health, including physical health.	Impacts on physical health and wellbeing are assessed in **ES Volume 1, Chapter 18: Human Health [APP-070].** This chapter provides a comprehensive assessment of the Scheme's potential effects on human health, including physical health and wellbeing, through consideration of a broad range of health determinants with physical health pathways. These include access to housing, access to open space and recreation, transport and connectivity, climate change, air quality, water quality, land quality, noise and vibration, and access to health and social care services. The assessment in **ES Volume 1, Chapter 18: Human Health [APP-070]** applies a health-based review of relevant technical chapters to identify potential pathways by which the Scheme could affect physical health. It concludes that, with the embedded mitigation and additional measures secured through the relevant management plans **[APP-277** to **APP-287]** secured by their respective requirements in Schedule 2 to the **Draft DCO [APP-016]**, the Scheme would not give rise to significant adverse effects on population physical health at any phase of the Scheme. Mitigation measures include (but are not limited to) ensuring PROWs remain open as much as is practicable, inbound workers are accommodated in the most suitable locations for housing and health service access, community liaison and engagement is maintained, and construction impacts on waterways, soils, noise and air quality are regulated. Priority has been given in the assessment to communities most likely to experience potential health-related effects, within the 2 km Study Area surrounding the Scheme. The Applicant notes that the assessment methodology for health and wellbeing has been agreed with Wiltshire Council's Public Health team and is set out in the relevant Statement of Common Ground to be submitted at Deadline 1**.**

Other Environmental Matters	
Respondents expressed concern that lithium batteries cannot be recycled.	Details of the disposal and end-of-life management of the Battery Energy Storage System (BESS), including lithium-ion batteries, are provided in **ES Volume 1, Chapter 20: Other Environmental Matters [APP-072]**, Section 20.3: Materials and Waste. This section confirms that recycling routes for solar PV panels and BESS components, including lithium batteries, are generally available at present, and that these routes are expected to expand further over the lifetime of the Scheme as the recycling market grows in response to increasing deployment of renewable energy infrastructure. The Materials and Waste assessment in **ES Volume 1, Chapter 20: Other Environmental Matters [APP-072]** and **Outline Site Waste Management Plan [APP-281], Outline Construction Environmental Management Plan [APP-277], Outline Operational Environmental Management Plan [APP-278]** and **Outline Decommissioning Strategy [APP-279]** also outlines that the Scheme will follow the waste hierarchy, prioritising reuse and recycling wherever reasonably practicable, with disposal as a last resort. This is a legal requirement under The Waste (England and Wales) Regulations 2011. An **Outline Site Waste Management Plan [APP-281], Outline Construction Environmental Management Plan [APP-277], Outline Operational Environmental Management Plan [APP-278]** and **Outline Decommissioning Strategy [APP-279]** have been submitted with the Application, which set out how waste, including BESS components, will be managed during construction, operation and decommissioning.. On this basis, the Materials and Waste assessment **ES Volume 1, Chapter 20: Other Environmental Matters [APP-072]** concludes that the Scheme would not give rise to significant adverse effects in relation to materials use or waste management, and that appropriate recycling and disposal routes for lithium-ion batteries are available and expected to improve further over time. Requirement 19 in Schedule 2 of the **Draft DCO [APP-016]** secures that, prior to commencement of construction, a detailed Site Waste Management Plan must be submitted to and approved by the relevant planning authority, and that construction must be carried out in accordance with the approved plan. Requirement 13 in Schedule 2 of the **Draft DCO [APP-016]** secures that no part of the authorised development may commence until a construction environmental management plan for that part has been submitted to and approved by the relevant planning authority. Requirement 14 in Schedule 2 of the **Draft DCO [APP-016]** secure that, prior to the date of final commissioning for any part of the authorised development, an operational environmental

	management plan for that part must be submitted to and approved by the relevant planning authority. Requirement 20 in Schedule 2 of the **Draft DCO [APP-016]** secures that, prior to decommissioning of the Scheme, a Decommissioning Strategy must be submitted to and approved by the relevant planning authority. The Decommissioning Strategy must be substantially in accordance with the Outline Decommissioning Strategy and ensure removal of above-ground infrastructure and appropriate management of all resulting waste, including recycling of BESS components where practicable.
Respondents expressed concern regarding the use of lithium batteries within the Scheme. Some respondents raised environmental and safety concerns in relation to lithium batteries, including the risk of fire and the potential danger or harm in the event of a Battery Energy Storage System (BESS) fire.	The Applicant notes that lithium-ion technology is currently the industry standard for utility-scale battery energy storage due to its proven efficiency, reliability and operational safety. Potential environmental and safety effects associated with the Battery Energy Storage System (BESS), including fire risk, are assessed in **ES Volume 1, Chapter 20: Other Environmental Matters, Section 20.7: Major Accidents and Disasters [APP-072].** This assessment considers credible worst-case accident scenarios and concludes that, with embedded mitigation and appropriate management measures, no significant adverse off-site effects are anticipated. The Applicant notes that the approach to BESS safety is under discussion with Dorset & Wiltshire Fire & Rescue Service (D&WFRS) and is set out in the relevant Statement of Common Ground to be submitted at Deadline 1. An **Outline Battery Safety Management Plan (OBSMP) [APP-286]** has been submitted with the Application. The OBSMP confirms that a robust and validated Emergency Response Plan (ERP) will be developed at the detailed design stage in consultation with Dorset & Wiltshire Fire and Rescue Service. Section 5.4 of the OBSMP sets out the typical emergency response protocols, procedures and safety information that will be included in the ERP. The ERP will apply across all phases of the Scheme, including construction, operation and decommissioning. The **OBSMP [APP-286]** is secured through Requirement 6 (Battery safety management) in Schedule 2 of the **Draft DCO [APP-016]**, which provides that Work No. 2 must not commence until a Battery Safety Management Plan has been submitted to and approved by the relevant planning authority. The approved plan must be substantially in accordance with the Outline Battery Safety Management Plan. The Draft DCO also requires the relevant planning authority to consult with Dorset and Wiltshire Fire and Rescue Service and the Environment Agency before determining the application, and that the Battery Safety Management Plan must be implemented as approved. The potential effects of toxic gases arising from a BESS fire are assessed in **ES Volume 1, Chapter 15: Air Quality [APP-067],** which models potential emissions and evaluates impacts

	on sensitive receptors within a 1 km radius of the BESS area, including residential properties and Public Rights of Way. The assessment concludes that no significant off-site air quality impacts are predicted should a fire event occur. In the unlikely event of a fire, the precautionary measures set out in the **OBSMP [APP-286]**, such as advice to remain indoors and close windows, would further reduce potential effects on nearby residents. On this basis, the Applicant considers that the Scheme incorporates appropriate safety and mitigation measures to manage BESS-related risks and would not give rise to significant adverse environmental or safety effects.
Respondents expressed general concern regarding potential glint and glare effects arising from the Scheme.	An assessment of glint and glare effects arising from the Scheme is provided in **ES Volume 1, Chapter 20: Other Environmental Matters [APP-072]**, Section 20.5: Glint and Glare. The assessment considers potential effects on surrounding receptors, including road and rail users, residential properties, public rights of way, aerodromes and sensitive viewpoints within the Cotswolds National Landscape. The assessment concludes that, with embedded mitigation measures secured through Section 3.18 of the **Outline Operational Environmental Management Plan [APP-278]**, including the use of fixed-tilt panels at a maximum height of 2.5 metres where required, no significant glint or glare effects are predicted to occur as a result of the Scheme. The preparation, approval and implementation of the detailed OEMP, substantially in accordance with the outline plan, are secured through Requirement 14 of Schedule 2 of the **Draft Development Consent Order [APP-016]**, ensuring operational noise is appropriately controlled throughout the lifetime of the Scheme.
Respondents expressed concern regarding electromagnetic fields.	The effects of electromagnetic fields (EMF) arising from the Scheme are assessed in **ES Volume 1, Chapter 20: Other Environmental Matters [APP-072]**, Section 20.6: Electromagnetic Fields. The assessment considers EMF emissions from the Scheme's electrical infrastructure and evaluates potential effects on surrounding receptors. The assessment concludes that no significant impacts are likely to occur as a result of any of the Scheme's infrastructure. It also confirms that predicted EMF levels are below the reference levels set by the International Commission on Non-Ionizing Radiation Protection.
Respondents expressed concern that the BESS is located too close to a railway line.	The location of the Battery Energy Storage System (BESS) has been informed by a detailed site selection and design evolution process, as set out in **ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP-056]**. This chapter explains that land at Lime Down D was identified as an appropriate location due to its proximity to the solar PV arrays and the on-site substation, providing operational benefits including minimising transmission losses, maximising storage efficiency, and enabling rapid and reliable grid response.

	In considering options for co-locating the BESS with the solar PV Sites, Lime Down D was selected as the preferred location due to its central position within the Scheme, effective natural and proposed screening, limited proximity to residential properties, and closeness to existing infrastructure corridors, including the railway line. Locating the BESS within an existing infrastructure corridor reduces the need for additional land take and avoids introducing new isolated infrastructure into undeveloped areas. The assessment concludes that siting the BESS at Lime Down D presents the lowest potential for significant adverse environmental effects. Accordingly, the proximity of the BESS to the railway line does not give rise to significant safety or environmental concerns. Furthermore, during an emergency event, Network Rail can be made aware of the incident and halt trains from passing the site if it is deemed necessary to do so. As such, there are no significant adverse effects to human health anticipated as a result of the Scheme, as assessed in **ES Volume 1, Chapter 18: Human Health [APP-070]**. The Applicant has followed National Fire Chiefs Council (NFCC) guidance and commissioned a Plume Assessment Study (**ES Volume 3, Appendix 15-2 APP/6.3**) to model toxic gas emissions and visibility impacts from a BESS fire on all sensitive receptors within a 1km radius of the BESS area. Six worst case BESS fire locations (i.e. locations within the BESS Area closest to sensitive receptors) have been modelled as depicted in **ES Volume 2, Figure 15-5: Battery Energy Storage System Fire Emissions Study Area [APP-166]**. The Concentrations of carbon monoxide (CO), formaldehyde, hydrogen chloride (HCl), hydrogen cyanide (HCN), hydrogen fluoride (HF), ammonia (NH_3), nitrogen dioxide (NO2) and particulates from a potential BESS fire have been modelled using an air quality dispersion model to determine the likely effects on human health. A high-level visibility assessment has also been undertaken using the modelled particulates results to determine the effect of BESS fire emissions on visibility on the local road and rail network to inform the **Outline Battery Safety Management Plan (OBSMP) [APP-286]**. The Plume Assessment Study has concluded that there are no significant toxic emission or visibility impacts at all sensitive receptor locations. The Applicant has also committed to commissioning an additional Plume Analysis Study at the detailed design stage as stipulated in Section 5.5.9 of the OBSMP and secured through the DCO: "*..at the detailed design stage a BESS system and site specific Plume Analysis study will be conducted to assess the environmental impact of a site incident to sensitive receptors within a 1 km radius. Toxic gas emissions to sensitive receptors must be below relevant public health*

	exposure limit guidelines when the battery system of a BESS is fully consumed (burnt out), production of Particulate Matter (PM) and a visibility impact assessment on any transport links within a 1 km radius of the BESS area will also be included. The ERP produced at the detailed design stage (template outlined in Section 5.4.4) will incorporate all necessary emergency response procedures and actions based upon thermal runaway test data supplied by the BESS system provider." The Applicant notes that the approach to BESS safety is under discussion with Dorset & Wiltshire Fire & Rescue Service (D&WFRS) and is set out in the relevant Statement of Common Ground to be submitted at Deadline 1. The **OBSMP [APP-286]** is secured through Requirement 6 (Battery safety management) in Schedule 2 of the **Draft DCO [APP-016]**, which provides that Work No. 2 must not commence until a Battery Safety Management Plan has been submitted to and approved by the relevant planning authority. The approved plan must be substantially in accordance with the Outline Battery Safety Management Plan. The Draft DCO also requires the relevant planning authority to consult with Dorset and Wiltshire Fire and Rescue Service and the Environment Agency before determining the application, and that the Battery Safety Management Plan must be implemented as approved.
Respondents expressed concern about the risk of a BESS fire.	The Scheme layout also incorporates separation distances between battery containers to ensure that any isolated fire would not become widespread or lead to a major incident – as shown on **ES Volume 2, Figure 3-1: Indicative Site Layout Plan [APP-081]**, the battery containers will be located more than 200 metres from the nearest Public Right of Way and more than 500 metres from any residential receptors. An **Outline Battery Safety Management Plan (OBSMP) [APP-286]** has been prepared for the Scheme using guidance from Dorset and Wiltshire Fire and Rescue Service and incorporating recommendations of the National Fire Chiefs Council. The OBSMP ensures that risks associated with battery storage are appropriately mitigated. The OBSMP will be amended at Deadline 1 to fully accommodate the latest BESS safety requirements contained in NFPA 855 (2026) ensuring that any credible risks associated with battery storage are either prevented or fully mitigated if a BESS failure occurs. Section 2.4.2 of the **OBSMP [APP-286]** stipulates that: *"Final BESS design and site layout will have been validated through mandatory Large Scale Fire Testing (LSFT) and rigorous consequence modelling to minimise the requirement for any D&WFRS intervention in a thermal runaway incident. LSFT must establish minimum equipment spacing distances that demonstrate there is no fire propagation to adjacent BESS enclosures or ESS equipment. D&WFRS intervention in worst case scenarios would typically be limited to boundary cooling of adjacent BESS and Energy Storage System (ESS) units to prevent the fire from spreading. This*

	strategy will be finalised with D&WFRS and be clearly communicated in the Emergency Response Plan (ERP); • *To ensure that fire, smoke, and any release of toxic gases does not significantly impact site operatives, first responders, and the local community; and* • *To ensure that firewater run-off is contained and tested before release or, if necessary, removed by tanker and treated offsite."* Section 5 of the **OBSMP [APP-286]** covers all requisite firefighting requirements for the Scheme including fire service access, firefighting water supply, and emergency planning requirements. Section 6.1.1 of the **OBSMP [APP-286]** confirms that at the detailed design stage, the selected BESS will have undertaken Large Scale Fire Testing (LSFT) to fully inform inputs for risk assessment tools which will be utilised together with detailed consequence modelling to provide a comprehensive site operations and emergency response safety audit. LSFT is a mandatory requirement under NFPA 855 (2026) safety standards to demonstrate thermal insulation protection capabilities of the BESS enclosure design, validate minimum equipment spacing distances, and demonstrate that deflagrations do not occur and/or can be safely constrained. As set out in the **OBSMP [APP-286]**, the BESS Area will have a robust and validated Emergency Response Plan (ERP), developed in consultation with Dorset & Wiltshire Fire and Rescue Service at the detailed design stage. Section 5.4 of the OBSMP specifies the typical emergency response protocols, procedures and safety information that will be included in the ERP. The ERP will apply to all stages of the Scheme, including construction, operation and decommissioning. Potential effects of toxic gases arising from a BESS fire are assessed in **ES Volume 1, Chapter 15: Air Quality [APP-067]** and in **ES Volume 1, Chapter 20: Other Environmental Matters [APP-072]**, Section 20.7: Major Accidents and Disasters. An assessment of how these fumes could affect sensitive receptors within a 1 km radius of the BESS Area, including residential properties and ecological receptors, is provided in **ES Volume 1, Chapter 15: Air Quality [APP-067]**. This assessment concludes that no significant off-site impacts are predicted should a fire event occur.

	The **OBSMP [APP-286]** is secured through Requirement 6 (Battery safety management) in Schedule 2 of the **Draft DCO [APP-016]**, which provides that Work No. 2 must not commence until a Battery Safety Management Plan has been submitted to and approved by the relevant planning authority. The approved plan must be substantially in accordance with the Outline Battery Safety Management Plan. The Draft DCO also requires the relevant planning authority to consult with Dorset and Wiltshire Fire and Rescue Service and the Environment Agency before determining the application, and that the Battery Safety Management Plan must be implemented as approved.
Cumulative and In-Combination Effects	
Respondents expressed concern regarding the cumulative impact of solar parks within Wiltshire. Some respondents considered that Wiltshire already hosts sufficient or too many solar parks.	In terms of the Lime Down project, a comprehensive Cumulative and In-Combination Effects Assessment has been undertaken in accordance with Planning Inspectorate Advice Note 17 and the relevant NPS EN-1, NPS EN-3 and NPS EN-5 requirements which are set out within **ES Volume 1, Chapter 21: Cumulative and In-Combination Effects [APP-074]** and associated Appendices **[APP-264].** Interaction with proposed or consented but not yet built developments has been fully explored within each of the technical assessments **[APP-059 - APP-072]** with a summary of each of these assessments provided within **ES Volume 1, Chapter 21 Cumulative and In-Combination Effects [APP-073].** Existing schemes are captured within the baseline environment. The four-stage cumulative assessment methodology is described within **ES Chapter 6 EIA Methodology [APP-058].** 358 developments were included in the Long List **[APP-264].** 41 developments are included in the short list (and are therefore assessed) including a number of proposed solar and BESS developments. The list of developments included in the cumulative assessment was reviewed and developed in consultation with Wiltshire Council. Table 21-8 within **ES Volume 1, Chapter 21 Cumulative and In-Combination Effects [APP-073] identifies that,** taking a conservative worse case approach, significant cumulative effects with the short list of developments are identified at a limited and discrete number of receptors comprising tourism and recreation impacts during the construction phase on Corsham Park, PRoW WT|CORM|122, long path and Sustrans Cycle Route 403, and on skylark at a District level. Skylark-specific mitigation and habitat enhancement measures are incorporated into the Scheme design to reduce effects on skylark as far as practicable and are described in **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061].** These include the provision of suitably large, open set-aside and grassland habitats designed to provide suitable skylark breeding and foraging conditions. These measures are illustrated in **ES Volume 2, Figure 3-4: Landscape and Ecological Mitigation Plan [APP-084]** and detailed in the **Outline Landscape and Ecological Management Plan (OLEMP) [APP-283]**. Such measures have

	been designed to reduce the anticipated residual effects resulting from the Scheme to a Local level of geographic importance.
Respondents expressed concern that the cumulative effects of the Scheme have not been adequately considered or assessed.	The Cumulative and In-Combination Effects Assessment as described above has been undertaken in accordance with Planning Inspectorate Advice Note 17 and the relevant NPS EN-1, NPS EN-3 and NPS EN-5 requirements which are set out within **ES Volume 1, Chapter 21: Cumulative and In-Combination Effects [APP-074]** and associated Appendices **[APP-264].** The assessment is comprehensive, taking into consideration 358 proposed or consented schemes within the identified Zones of Influence. The long-list and short-list has been developed and agreed in consultation with Wiltshire Council as set out within **ES Volume 1, Chapter 21: Cumulative and In-Combination Effects [APP-074]**.
Community Benefits	
Respondents expressed the view that the Scheme would provide no meaningful benefit to the local community, or that the proposed benefits would be insufficient. Some respondents also expressed scepticism as to whether any community benefits would in practice be delivered.	The Applicant acknowledges that any adverse effects from the Scheme are more likely to be felt locally than the largely wider-scale benefits of the Scheme. The Scheme is anticipated to help meet the UK's net zero requirements for energy production, which is considered a critical national priority and set out in National Policy Statements for Energy NPS EN-1 (section 4.2) and EN-3. This therefore will benefit the national population rather than just the local population. The benefits of the Scheme are set out in Section 5.3 of the **Planning Statement [APP-267]** and include the delivery of large amounts of cheap, secure, and low carbon electricity which will help the UK to achieve net zero by 2050, ecological and landscape enhancements, biodiversity net gain, permissive paths, employment generation, economic benefits and skills training. The Scheme is also anticipated to benefit the population within approximately 20km of the Scheme, through providing employment and income especially during construction and peak replacement activities, and providing skills and training opportunities. Where the Scheme is anticipated to benefit local people more specifically, this is done through providing onsite permissive paths to increase access to the countryside, providing improved landscape planting through reinforcing existing hedgerows and planting of new trees, providing

	biodiversity net gains through habitat improvements. That notwithstanding, the Applicant is committed to providing a Community Benefit Fund to allow for community-driven benefits that are not necessarily associated with the Scheme itself. The purpose is to establish a means to recognise local community needs that the Applicant wants to be able to contribute towards in recognition of the local impact of the Scheme.
Respondents expressed concern that insufficient information or detail has been provided in relation to community benefits and requested further clarification.	The Applicant reaffirms its commitment to the provision of a Community Benefit Fund should the Scheme be consented. The Applicant has explored ways in which the fund could be administered through discussions with appropriate bodies, such as established community benefit facilitators, and has sought opinions and suggestions throughout the consultation phases of the Scheme, noting additional expressions of suitable areas of support through the review of, and responses to, relevant representations. Information on the mechanics of the Community Benefit Fund and the areas to which it will contribute are being developed through ongoing consultation with Wiltshire Council, local parish councils, and any community groups that would like to be involved and have needs or services they would like to see benefit from the available funds. The Community Benefit Fund is separate from the DCO process, and so is not bound to the same timescales or information requirements as submitted information. Furthermore, community benefits are legally immaterial to planning decisions and cannot be considered when deciding whether to grant planning consent. The Applicant acknowledges this and so has sought to provide the Community Benefit Fund voluntarily even though it won't add favourable weight in the planning balance.