

Lime Down Solar Park

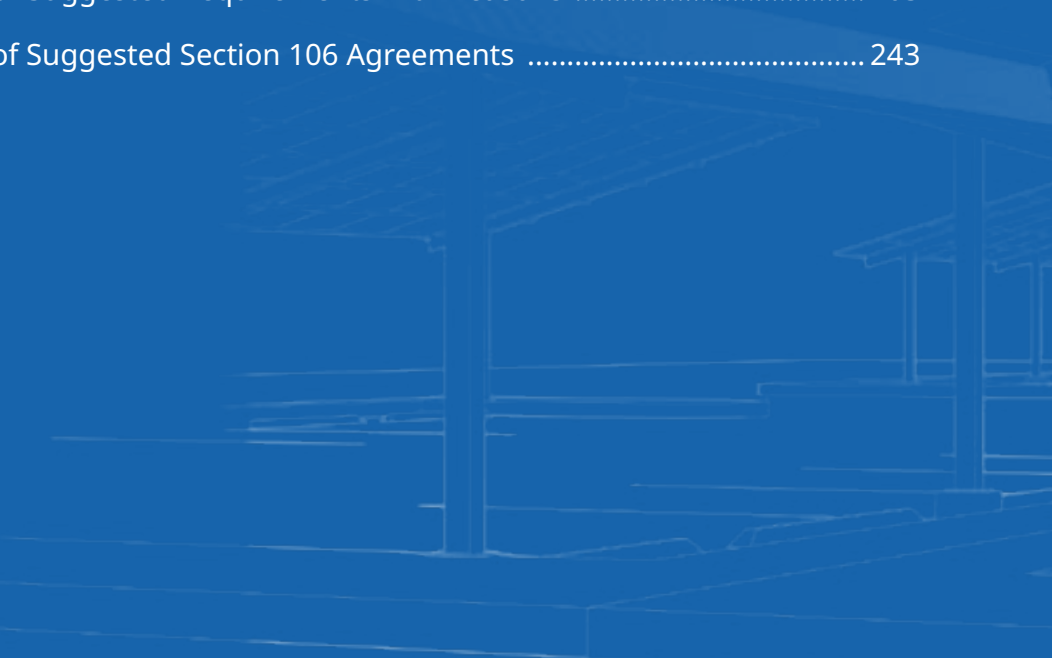
Local Impact Report
Spring 2026

Wiltshire Council

The logo for Wiltshire Council, featuring a white stylized wave or swoosh underneath the text.

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Non-technical executive summary

What is a Local Impact Report

The planning process for dealing with proposals for Nationally Significant Infrastructure Projects or 'NSIPs' was established by the Planning Act 2008 ('the 2008 Act'). National Guidance published in 2024, 'Nationally Significant Infrastructure Projects: Advice for Local Authorities' is relevant for the consideration of the Development Consent Order (DCO) via Sections 104(2)(b) and 105(2)(a) of the Planning Act 2008. The process involves an examination of major proposals relating to energy, transport, water, waste and waste water, and includes opportunities for people to have their say before a decision is made by the relevant Secretary of State (SoS). As part of the process, the relevant local authorities are invited to submit a Local Impact Report (LIR) giving details of the likely impact of the proposed development on the authority's area. This is that report.

Why is it important?

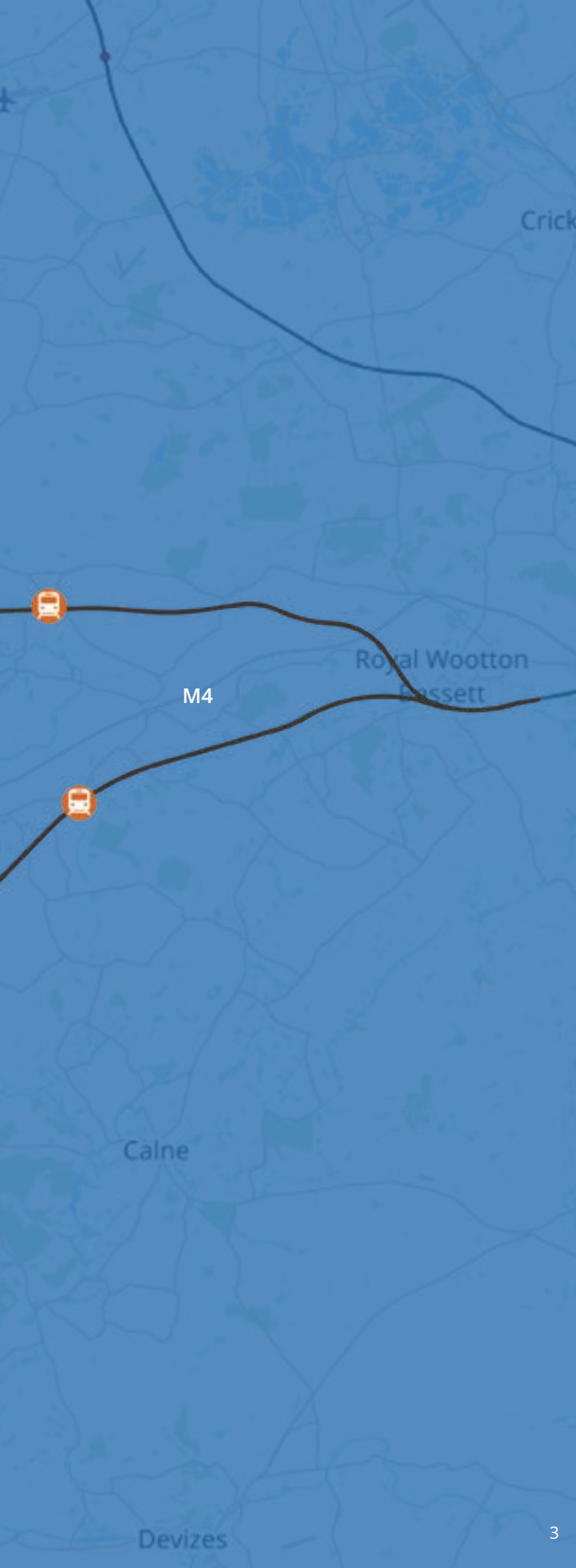
This document is an important part of the examination process. The Examining Authority (ExA) on behalf of the Planning Inspectorate invite relevant local authorities to submit LIRs and having regard to their content in making recommendations to the SoS, who will make the decision on whether to make a DCO authorising the project. In coming to a decision, the SoS must have regard to any LIRs that are submitted by the deadline.

What is being proposed?

Project Overview

- Location: North of the M4, near villages including Hullavington, Alderton, Luckington, Sherston, and others.
- Size: Covers approximately 1,237 hectares of land.
- Capacity:
 - Solar generation: Over 500 MW, enough to power 115,000+ homes annually.
 - Battery storage: Up to 1,000 MWh.
 - Grid connection: 500 MW export and 250 MW import capacity.
- Solar Arrays: Spread across five sites (Lime Down A-E).
- Substations: Includes multiple 33 kV, 132 kV, and one 400 kV substation.
- Battery Energy Storage Systems (BESS): Located in Lime Down D.
- Cable Corridor: Underground cables connecting to Melksham Substation.
- Other Facilities: Access tracks, conversion units, security fencing, CCTV, and construction compounds.





How did the council identify the impacts?

An objective sequential approach has been applied by the council to ensure that the identified impacts of the scheme are presented consistently and clearly to the ExA in a manner which is based on national guidance¹ and identified best practice. The council has based its evaluation of the local impacts on evidence not opinion.

What have we found?

The impacts identified in this report can be found in the themed sections later in the report. In summary the following is concluded:

Socio-economics, tourism and recreation impacts

- Increase in gross value added (GVA) to local area, but the increase will only benefit the wider economy during construction, replacement and decommissioning.
- Increase in viability for landowners/farm businesses that benefit from payments for hosting the solar farm.
- Significant negative impact on tourism and recreation throughout the solar farm's tenure.

Archaeological impacts

- Mitigation measures can be built in to minimise the impacts on heritage assets, but potential adverse impacts cannot be removed completely.

Highways impacts

- Safety and operational concerns because many minor routes cannot accommodate two heavy goods vehicles (HGVs) passing, and existing passing places have not been assessed or improved.

¹ National Guidance published in 2024, 'Nationally Significant Infrastructure Projects: Advice for Local Authorities'

- There is a high risk of highway damage, especially where narrow sections force vehicles onto verges, potentially causing frequent over running.
- Although the Outline Construction Traffic Management Plan [APP-287] proposes road condition surveys, it would be preferable to provide passing place improvements upfront rather than rely on monitoring and later repairs.
- Construction would add significant HGV traffic to minor rural roads.
- These volumes raise safety and congestion concerns because passing opportunities for large vehicles are limited.
- Uncertainty over how excavated material will be handled could increase HGV trips further, adding to cumulative impacts on sensitive routes.

Public Rights of Way impacts

- Visual amenity
- Noise
- Construction activity decommissioning activity
- Possible conflicts between PRow users using the highway network to get to PRow

Landscape and Visual impacts

- Significant, unmitigable harm to the intrinsic character of the Limestone Lowland landscape during all project phases.
- Major negative effects on the setting of the Cotswolds National Landscape (CNL) due to the scale and location of Areas A–C, affecting PRow, road links, and views along the Fosse Way.
- Substantial adverse visual impacts for residents, visitors, and users of the landscape, many of which cannot be effectively mitigated.
- Construction traffic and rural road works will negatively affect the rural character and tranquillity of areas contributing to the CNL's setting.

- The project undermines the role of the surrounding landscape in separating rural settlements and providing recreational countryside, reducing rural character and experiential quality.

Built Heritage impacts

- Harm to the rural setting of Grade 1 Bradfield Manor has not been demonstrated to be effectively mitigated and may impact on its significance, particularly as the 17th century parlour wing was designed to enjoy long views; impacts worsened by the siting of the BESS and substation.
- Highway works to the access track for Site E will cause harm to Rodbourne Conservation Area that has not been assessed and for which no mitigation is currently proposed.
- Temporary construction works (including the siting of a compound) for cabling will cause harm to the significance of the Grade II* Grittleton House that has not been assessed and for which no mitigation is currently proposed.

Public Health and Public Protection impacts

- Impact on community identity and culture in surrounding areas.
- Risk of poor community engagement leading to frustration, stress and anxiety and mental health issues for residents.
- Noise Impacts: there are disparities between the mitigation set out in ES Chapter 14 Noise and Vibration [APP-066] and the mitigation contained within the Outline Operational Environmental Management Plan [APP-278].

Flood Risk and Drainage impacts

- Risk of sediment-laden or hydrocarbon-contaminated runoff unless wheel washes and bunded refuelling zones enforced (construction phase).
- Lack of pre and post-construction exceedance flow routing for 1 in 100-year + CC event (construction phase).

- Horizontal Directional Drilling (HDD) near watercourses without agreed Lead Local Flood Authority (LLFA) principles (construction phase).
- Flood Zone 3b not defined for effective planning (operational phase).
- Increase in impermeable areas (substations, BESS) leading to localised flooding risk (operational phase).
- Potential increases in discharge to watercourses elevating downstream flood risk (operational phase).
- No site-specific decommissioning runoff plan (temporary drainage layout and sequencing missing) (decommissioning phase).
- No Sustainable Urban Drainage System (SuDS) retirement plan (risk of orphaned drainage structures and pollution pathways) (decommissioning phase).
- Soil reinstatement targets and post-works verification undefined (decommissioning phase).
- Reduced food production for consumption in the UK.
- Potential for tenanted farms to become unviable.
- Potential for pollution to occur e.g. fuel spills.
- Construction and decommissioning process will lead to soil compaction and adversely impact land drainage as well as use of land for agricultural purposes after decommissioning.

Development Management and Strategic Planning impacts

- Policy context: The scheme contributes to reducing the effects of climate change. It also contributes to aspirations to increase energy generation using renewable sources. Aligns with local policy support (e.g. CP42, SCC3) if adverse impacts are mitigated.
- Agricultural land loss: Around 878 ha, including 30% Best and Most Versatile land, would be removed from food production (approximately 5,000 tonnes of crops/year). Further evidence is needed on lower quality land alternatives, soil remediation, pollution protocols, and grazing feasibility.
- Cumulative landscape effects: Existing solar and BESS developments in north Wiltshire mean cumulative impacts require robust assessment. Key omissions relate to sequential views, especially along the Fosse Way, A429/A350, and sites such as Newton Dairy, Long Newton Airfield, Upper Marsh Farm, Rodbourne Rail, and Red Barn.
- BESS fire safety: Layout appears aligned with National Fire Chief's Counsel (NFCC) and National Fire Protection Association (NFPA) 855 guidance, but the applicant must clarify why "optional" is used for the fire suppression system, as this conflicts with later statements indicating it is embedded in the design.


Climate Change impacts

The greenhouse gas emissions assessment figures as submitted raise concerns as to the overall benefit in terms of emissions savings of the Scheme.

- Lack of Strategic Spatial Energy Plan makes it unclear whether a scheme of this scale is appropriate in this location.
- Further emission reduction measures are required within Outline Construction Environmental Management Plan [APP-277] (OCEMP), Outline Operational Environmental Management Plan [APP-278] (OOEMP), and Outline Decommissioning Strategy [APP-279] to minimise green house gas (GHG) impacts.

Soils and Agriculture impacts

- Loss of jobs and expertise related to food production.



Section 1: Introduction to the report, glossary of terms and abbreviations, applied methodology and exclusions

Introduction

This LIR has been prepared by Wiltshire Council's Major Projects Team with input from officers specialising in; Highways and Transport, Network Management, Archaeology, Built Heritage and Conservation, Climate Change, Landscape and Visual, Minerals and Waste, Ecology and Biodiversity, Arboriculture, Public Protection, Public Health, Soils and Agriculture, Flood Risk and Drainage, Public Rights of Way, Economy and Regeneration, and Development Management and Strategic Planning. The LIR forms part of the local authority's responses to the Lime Down Solar Park DCO.

The LIR is defined in section 60(3) of the Planning Act 2008 (as amended) as 'a report in writing giving details of the likely impact of the proposed development on the authority's area (or any part of that area)'.

This LIR contains a section on the existing characteristics of the local area on which the scheme impacts. It identifies the local urban and landscape qualities, cultural heritage, ecology, minerals and waste sites, the environment for pedestrians, cyclists and equestrian travellers, watercourses and the air quality and noise environment. The report also provides an assessment and considers compliance of the scheme against the local plans and policies (Appendix A) and details the history and development of the scheme.

The themed based sections contain an assessment of positive, neutral and negative impacts, during construction, operation and decommissioning of the scheme, as well as areas where the council considers there are further opportunities which the scheme doesn't thus far fully realise. Where negative impacts are identified mitigatory measures are recommended to, as far as possible, remedy them.

Glossary of Terms and Abbreviations

AIA

Arboricultural Impact Assessment

AIL

Abnormal Indivisible Load

AONB

Area of Outstanding Natural Beauty

BAP

Biodiversity Action Plan

BESS

Battery Energy Storage System

BMV

Best and Most Versatile

BNG

Biodiversity Net Gain

BoCC

Birds of Conservation Concern

BREEAM

Building Research Establishment
Environmental Assessment Method's

BS

British Standard

CC

Climate Change

CEMP

Construction Environmental Management
Plan

CIL

Community Infrastructure Levy

CL:AIRE DoW CoP

Contaminated Land: Applications in Real
Environments - Definition of Waste: Code
of Practice

CNL

Cotswolds National Landscape

CRC

Cable Route Corridor

CS3

The South Gloucestershire Local Plan Core
Strategy 3

CTMP

Construction Traffic Management Plan

DAMS

Detailed Archaeological Mitigation
Strategy

DCO

Development Consent Order

DEFRA

Department for Environment, Food and
Rural Affairs

DESNZ

Department for Energy Security and
Net Zero

DLL

District Level Licensing

DRP

Decommissioning and Restoration Plan

EA

Environment Agency

ECoW

Ecological Clerk of Works

EIA

Environmental Impact Assessment

EPMS

Ecological Protection and Mitigation
Strategy

ES

Environmental Statement

ExA

Examining Authority

FRA

Flood Risk Assessment

FTE

Full-Time Equivalent

GHG

Greenhouse Gases

GLN

Great Crested Newt

GVA

Gross Value Added

HDD

Horizontal Directional Drilling

HGV

Heavy Goods Vehicle

HIA

Highway Improvement Area

HMMP

Habitat Management and Monitoring Plan

HPI

Habitats of Principal Importance

HRA

Habitats Regulations Assessment

HVO

Hydrotreated Vegetable Oil

IACPC Impact Assessment and Conservation Payment Certificate
IEMA Institute of Environmental Management and Assessment
ILP Institution of Lighting Professionals
kV Kilovolt
LP Local Plan
LEMP Landscape and Ecological Management Plan
LIR Local Impact Report
LLFA Lead Local Flood Authority
LNR Local Nature Reserve
LPA Local Planning Authority
LVIA Landscape and Visual Impact Assessment
LWS Local Wildlife Sites
MSAs Minerals Safeguarding Areas
MW Megawatt
MWh Megawatt-hour
NE Natural England
NESO National Energy System Operator
NFCC National Fire Chief's Counsel
NPPF National Planning Policy Framework
NPS National Policy Statements
NRMM Non-Road Mobile Machinery
NRSA New Roads and Street Works Act 1991

NSIP Nationally Significant Infrastructure Projects
OAMS Outline Arboricultural Method Statement
OCEMP Outline Construction Environmental Management Plan
OEMP Outline Environmental Management Plan
OOEMP Outline Operational Environmental Management Plan
PEIR Preliminary Environmental Information Report
PINS Planning Inspectorate
PPG Planning Practice Guidance
PRoW Public Rights of Way
PV Photovoltaic
RPA Root Protection Area
RSA Road Safety Audit
RTWA Road Traffic Regulations Act 1984
S106 Section 106 of the Town and Country Planning Act 1990 (as amended)
SAC Special Area of Conservation
SoS Secretary of State
SPA Special Protection Area
SPI Species of Principal Importance
SRMP Soil Resource and Management Plan
SROH Specification of Reinstatement of Openings in the Highway 5th Edition
SSSI Site of Special Scientific Interest

SuDS

Sustainable Urban Drainage System

SWMP

Site Waste Management Plan

TCPA 1990Town and Country Planning Act 1990
(as amended)**TMA**

Traffic Management Act 2004

TTM

Temporary Traffic Management

UK

United Kingdom

WCAS

Wiltshire Council Archaeology Service

WCS

Wiltshire Core Strategy

WHS

World Heritage Site

WMS

Written Ministerial Statement

Applied methodology

A sequential approach has been applied by the council to ensure that the identified impacts of the scheme are presented consistently and clearly to the Inspectorate in a manner which is based on national guidance and identified best practice.



An evidence based approach

The council has based its evaluation of the local impacts on evidence and the judgement of specialists. Wherever evidence has been the basis for highlighting a potential impact to the ExA, then it has been fully referenced by footnotes/hyperlinks so that there is a clear audit trail to follow.

Evaluating the nature of the impacts (positive, negative or neutral)

The evidence reveals impacts and the next stage was an implementation of a systematic approach to clearly indicate to the ExA if these impacts were positive, neutral or negative and why. Furthermore, additional refinement was added to clarify when such impacts were likely to occur, for example during construction

phases, operation or indeed long-term strategic impacts on the area. Where issues were finely balanced the council relied on key specialists to draw on experience and local knowledge to balance the evidence and produce robust conclusions.

Example
(1) Summary of main impacts
Positive impacts – Construction Phase
<i>Insert</i>
Positive impacts – Operational
<i>Insert</i>
Positive impacts – Decommissioning Phase
<i>Insert</i>
Neutral impacts
<i>Insert</i>
Negative impacts – Construction Phase
<i>Insert</i>
Negative impact – Operational
<i>Insert</i>
Negative impact – Decommissioning Phase
<i>Insert</i>

Identifying extant opportunities

Through this work where the council have identified opportunities presented by the project which are yet to be capitalised on they have taken the opportunity to draw these to the attention of the ExA. For clarity, these are shown in a separate table within each topic section.

Mitigation

Many of the negative impacts identified in this report could be lessened or eliminated through further mitigatory works and management during or post construction. To ensure the scheme is as sensitive to the local environment as possible, where mitigation would be

effective in treating these impacts we have requested that the SoS considers conditions and legal agreements to secure this.

Requirements (planning conditions)

The council has only suggested requirements (planning conditions) where they will either enhance the quality of development or enable the development proposals to proceed, where it would otherwise have been necessary to request refusal of development consent, by mitigating the adverse effects of the development. The council has set out clearly the rationale for the requested requirements (conditions) and have acted in a way that is clearly seen to be fair, reasonable and

practicable. The requirements (conditions) are tailored to tackle specific problems, rather than standardised or used to impose broad unnecessary controls.

Paragraph 206 of the National Planning Policy Framework (NPPF) states “Planning conditions should only be imposed where they are:

1. necessary;
2. relevant to planning and
3. to the development to be permitted

4. enforceable
5. precise and
6. reasonable in all other respects.”

The six tests must all be satisfied each time a decision to grant planning permission subject to conditions is made. For the purposes of clarity, this report summarises the requirements requested within the themed sections related to each main topic area and provides a consolidated list with reasons in Appendix B using the following format:

Specialist topic		Requirement to be discharged by:	
Requirement	Reason	Secretary of State	Wiltshire Council
<i>Insert condition here</i>			

Development consent obligations

(a) Definition

Development consent obligations are planning obligations under Section 106 of the Town and Country Planning Act 1990 (as amended) (TCPA 1990) and are commonly known as s106 Agreements. They are a mechanism which makes a development proposal acceptable in planning terms that would not otherwise be acceptable.

The common uses of planning obligations are to control the impact of development, compensate for loss or damage caused by

development and mitigate a development’s impact. Section 106 (1) TCPA 1990 provides an obligation can:

- restrict the development or use of the land in any specified way
- require specified operations or activities to be carried out in, on, under or over the land
- require the land to be used in any specified way or
- require a sum or sums to be paid to the

authority (or, to the Greater London Authority) on a specified date or dates or periodically.

A planning obligation may be conditional or unconditional, it can specify restrictions definitely or indefinitely, and in terms of payments the timing of these can be specified in the obligation (s106(2) TCPA 1990).

The planning obligation is a deed, which states that it is an obligation for planning purposes that identifies the relevant land, the person entering the obligation and their interest and the relevant local authority that would enforce the obligation. Planning obligations are either contained in a bilateral agreement between the Local Planning Authority (LPA) and the landowner/ developer or a unilateral undertaking made by the landowner/ developer alone.

(b) Legal tests

There are legal tests for when you can use a s106 Agreement:

Regulation 122 of the Community Infrastructure Levy (CIL) Regulations 2010 (as amended) provides that a planning obligation can only constitute a reason for granting the DCO, if the obligations are:

- necessary to make the development acceptable in planning terms
- directly related to the development
- fairly and reasonably related in scale and kind to the development.

Regulation 123 of the CIL Regulations 2010 (as amended) limits the pooling of planning obligations. No more than five planning obligations since 6 April 2010 may be pooled towards an infrastructure project or type if it is capable of being funded through the CIL. Regulation 123 also prevents the council seeking planning obligations for any items listed on its Regulation 123 Infrastructure List which are to be funded through the CIL. However, at the time of writing, the

government has published draft regulations that will, when enacted, revoke Regulation 123 and abolish the pooling limitations on S106 agreements.

(c) Relationship to 'requirements' (planning conditions)

As well as the legal tests, the policy tests are contained in the NPPF:

"56. Local planning authorities should consider whether otherwise unacceptable development could be made acceptable through the use of conditions or planning obligations. Planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition."

Therefore, wherever possible all mitigation identified to try and remedy the impacts identified in this LIR has been requested to the SoS through the requirements set out in Appendix B.

(d) Development consent obligations in relation to this scheme

The council will work with the applicant to produce a draft agreement during the examination stage, and acknowledges that early agreement on the draft s106 agreement will help the ExA to provide greater focus to the examination and make the best use of the time available. Therefore, the council intends to work with the applicant to agree a draft Heads of Terms as soon as is possible for submission to the ExA.

The Rule 6 Letter [PD-006] makes it clear that the issue of the S106 agreement will be considered during the examination. Therefore, the Examining Authority can only take into account submissions and documents that have been submitted by the close of the examination period. For s106 agreements, this means a signed deed must be submitted to the ExA before the deadline for the close of examination. This we will do.

What is excluded?²

There are a number of things this report purposely does not do.

Whether the SoS should approve the application

The council has produced this LIR to objectively set out of what it considers to be the main impacts of the scheme in question. While it does indicate which it considers the most important impacts it is done so irrespective of whether the local authority considers the development should be approved or not. That is not the purpose of an LIR. The local authority will submit a separate written representation to express a particular view on whether the application should be granted.

Environmental Impact Assessment (EIA)

The LIR does not replicate the EIA. Nor is it necessary to replicate any assessment already produced in respect of the site such as those included in National Policy Statements (NPS).

Community consultation

In producing a LIR, the local authority is not required to carry out its own consultation with the community.

Balancing exercise

In accordance with Advice Note One, this report consists of a statement of positive, neutral and negative local impacts, but it does not contain a balancing exercise between positives and negatives. That is the prerogative of the ExA.

Representation of third party comments

It is not the purpose of this report to duplicate the representations of parish councils, organisations and members of the public

that have been made to the local authority or directly to the applicant about the scheme (prompted, for example, by the applicant's consultation). The council has encouraged such respondents to register with the Planning Inspectorate as 'interested parties' at the appropriate time so that their representations about the scheme will be considered by the ExA.

Statement of compliance with National Policy Statements (NPS)

The local authority has not included an assessment of compliance with an NPS as this is the prerogative of the ExA in making a recommendation to the SoS who as per the Planning Act 2008 must have regard to them in the decision-making process. However, NPS have been used in the relevant sections as a guide to matters of local impact that are likely to be relevant to the determination of the DCO application.

A theme based approach

The council has identified the key areas where it considers that local impacts will be felt and these are set out in the contents page. The themes have been identified using the Wiltshire Core Strategy - Sustainability Appraisal³, the EIA screening process⁴ as a baseline together with local specialist knowledge. Internal specialists have been consulted and asked to identify the impacts on their own area of expertise. To ensure a consistent approach which we hope will be easy for the ExA to follow, the comments from the relevant specialists have been collated into a standard format as shown in the example on the next page.

2 National Guidance published in 2024, 'Nationally Significant Infrastructure Projects: Advice for Local Authorities'

3 <http://www.wiltshire.gov.uk/wiltshire-core-strategy-sustainability-appraisal-report-2012-feb.pdf>

4 The Town and Country Planning (Environmental Impact Assessment) Regulations 2017

Topic: 'An example'

Overview and commentary on

The main local impacts of the scheme of 'an example' are shown in the table below. The characteristics of 'an example' in the local area are that of.....

Summary of main impacts identified by Wiltshire Council

Example
(1) Summary of main impacts
Positive impacts – Construction Phase
<i>Insert</i>
Positive impacts – Operational
<i>Insert</i>
Positive impacts – Decommissioning Phase
<i>Insert</i>
Neutral impacts
<i>Insert</i>
Negative impacts – Construction Phase
<i>Insert</i>
Negative impact – Operational
<i>Insert</i>
Negative impact – Decommissioning Phase
<i>Insert</i>
Main issues listed as most significant to least significant impact'
Specialist topic area

Ranking the An Example impacts in importance

All the local impacts identified are considered material to the ExA, but in accordance with the national guidance⁵ the council would indicate the importance of those identified in the following order.

Requirements recommended to the Examining Authority to mitigate impact

Should the Examining Authority be minded to approve this proposal then Wiltshire Council would request that the following requirements (conditions) be considered to mitigate the impacts identified above.

Requirement	Reason
Development shall not commence until X has been submitted to and approved by the Local Authority.	To ensure that impacts on 'an example' are mitigated.

5 National Guidance published in 2024, 'Nationally Significant Infrastructure Projects: Advice for Local Authorities'

Section 2: Context





1. Overview

- Project Name: Lime Down Solar Park
- Developer: Island Green Power (IGP), owned by Macquarie Asset Management
- Location: North of the M4, between Malmesbury and Chippenham, with a cable connection running south to Melksham, Wiltshire
- Scale: Approx. 1,237 hectares (749.3 hectares for solar PV across 5 sites and 463.2 hectares for cable route corridor)
- Output: Up to 500 megawatts (MW) of solar energy – enough to power ~ 115,000 homes
- Status: Application for a Development Consent Order (DCO) submitted to the Planning Inspectorate (PINS) on 19 September 2025

2. Planning context

- Classification: Nationally Significant Infrastructure Project (NSIP) under the Planning Act 2008
- Decision-making authority: Secretary of State for Energy Security and Net Zero (not Wiltshire Council)
-

3. Key features of the proposal

Lime Down Solar Park will comprise the construction, operation and maintenance, and decommissioning of a solar photovoltaic (PV) panel array electricity generating station. The scheme will also include associated infrastructure to support the solar PV generating station.

The scheme comprises five land parcels, Lime Down A, B, C, D and E (collectively referred to as the 'solar PV sites'), and a cable route corridor and works to the existing National Grid Melksham Substation. The solar PV sites will comprise land for solar PV and battery storage, associated infrastructure, and landscaping, heritage, surface water and biodiversity mitigation areas.

The landscape within and surrounding the solar PV sites comprises predominantly agricultural fields and rural villages and hamlets, including Sherston (approximately 300m north of Lime Down A), Luckington (approximately 830m west of Lime Down C), Alderton (approximately 200m west of Lime Down C), Norton (approximately 200m south of Lime Down B and 200m north and 750m east of Lime Down D), Foxley (approximately 750m north of Lime Down B), Corston (approximately 750m east of Lime Down D and 550m north of Lime Down E), Hullavington (approximately 700m south of Lime Down D), and Rodbourne (approximately 350m northeast of Lime Down E). The town of Malmesbury is located approximately 3km northeast of Lime Down B.

The associated development includes, but is not limited to, Battery Energy Storage (BESS); Conversion Units / 33 kV Sub-distribution Switch Rooms; the development of on-site substations; cabling between areas of solar PV and areas for landscaping and biodiversity mitigation.

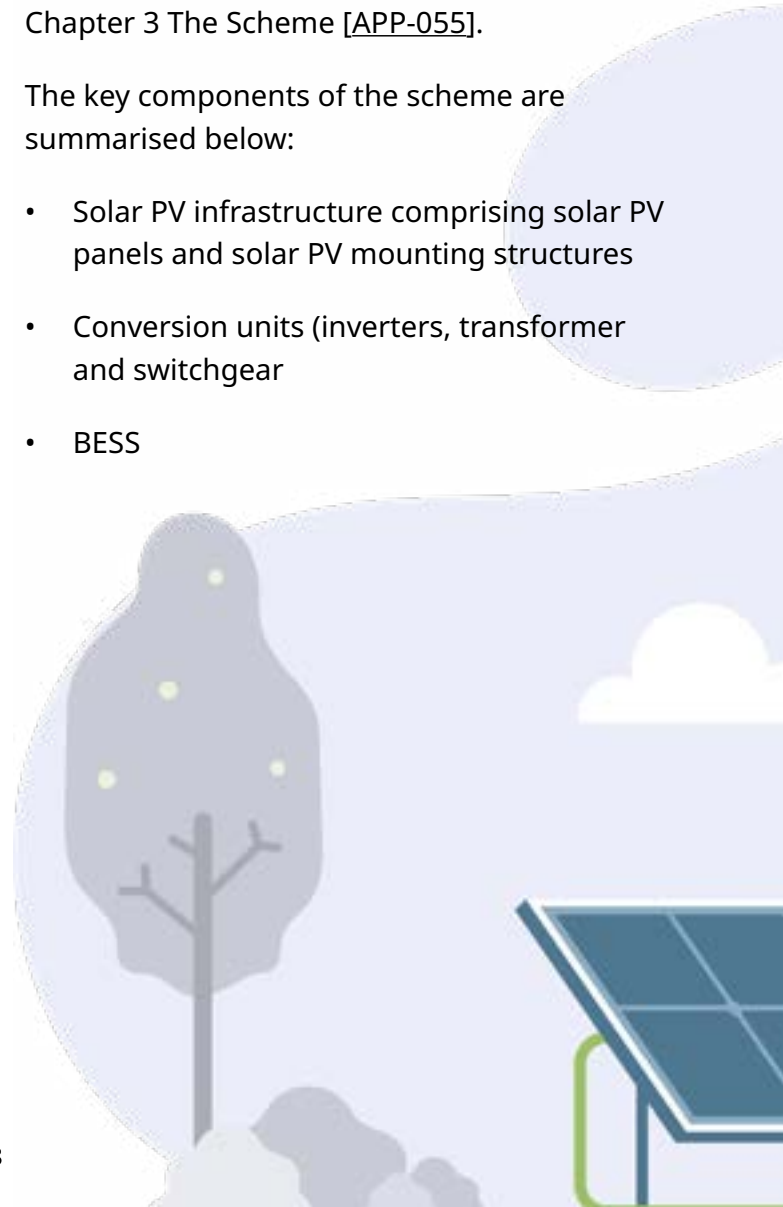
The scheme also includes a cable route corridor within which the export connection cables would be located to connect the solar PV sites to the National Grid at the existing Melksham Substation, as well as connecting each of the solar PV sites.

Works at the existing National Grid Melksham Substation involve the addition of new electrical infrastructure and associated civil works to comprise a new 400 kV feeder bay to receive the grid connection cables for the scheme.

A full description of the Scheme is included in 6.1 Environmental Statement Volume 1, Chapter 3 The Scheme [[APP-055](#)].

The key components of the scheme are summarised below:

- Solar PV infrastructure comprising solar PV panels and solar PV mounting structures
- Conversion units (inverters, transformer and switchgear)
- BESS



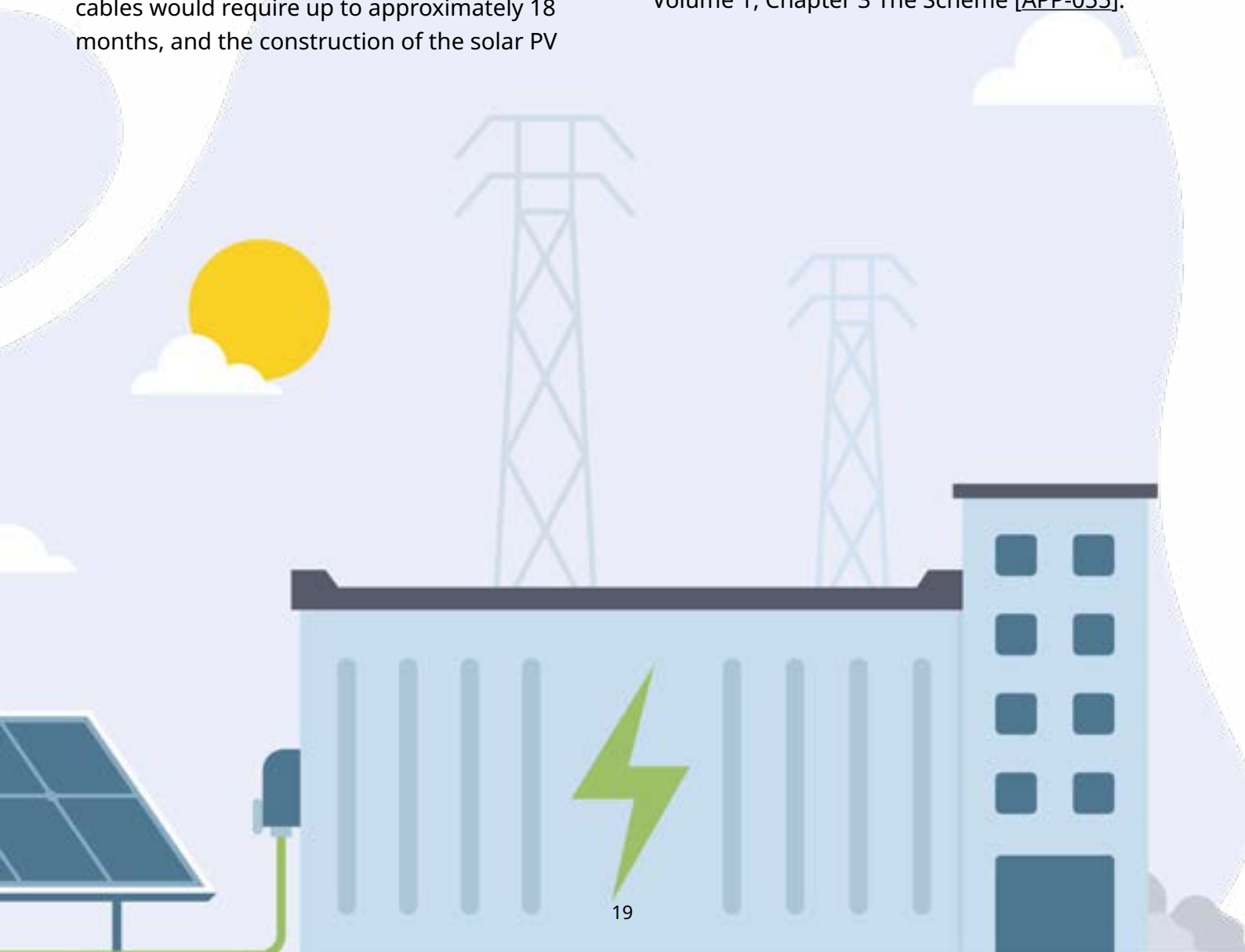
- On-site substations
- Cabling (on-site cables, interconnecting cables, and grid connection cables)
- Site accesses
- Highway improvement areas
- Fencing and security
- Ecological mitigation and enhancement areas
- Surface water drainage
- Landscaping.


Subject to being granted development consent and following a final investment decision, the earliest that construction of the scheme could start is in 2027. Construction of the solar PV sites and grid connection cables would start in tandem. The installation of the grid connection cables would require up to approximately 18 months, and the construction of the solar PV

sites would require an estimated 24 months. The operation and maintenance phase is anticipated to commence in 2029.

The design life of the scheme is 60 years with decommissioning expected to take place 60 years after final commissioning (the design life is therefore anticipated to be 2029-2089). 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. All solar PV panels, mounting piles, cabling, inverters, transformers, switchgear, BESS and substations would be removed from within the solar PV sites and recycled or disposed of in accordance with good practice and market conditions at that time.

A more detailed description of the components of the Scheme and programme of works is provided in 6.1 Environmental Statement Volume 1, Chapter 3 The Scheme [[APP-055](#)].





Section 3: Compliance with the development plan

The development plan for this purpose comprises:

Plan	Adopted/Timeframe	Hyperlink
Wiltshire Core Strategy	January 2015	Wiltshire Core Strategy - Wiltshire Council
Wiltshire Housing Site Allocations Plan	February 2020	Wiltshire Housing Site Allocations Plan - Wiltshire Council
Chippenham Site Allocations Plan	May 2017	Chippenham Site Allocations Plan - Wiltshire Council
Wiltshire and Swindon Minerals Core Strategy	July 2009	Minerals Core Strategy
Wiltshire and Swindon Minerals Development Control Policies	September 2009	Minerals Development Control Policies
Wiltshire and Swindon Aggregate Minerals Site Allocations DPD	2013	Aggregate Minerals Site Allocations Local Plan
Wiltshire and Swindon Waste Core Strategy	June 2009	Waste Core Strategy
Wiltshire and Swindon Waste Development Control Policies	September 2009	Waste Development Control Policies
Wiltshire and Swindon Waste Site Allocations DPD	February 2013	Waste Site Allocations Local Plan
West Wiltshire Leisure & Recreation DPD	February 2009	West Wiltshire Leisure and Recreation Development Plan document
North Wiltshire Local Plan	April 2006	North Wiltshire Local Plan 2011 - Wiltshire Council
Kennet Local Plan	June 2004	Kennet Local Plan 2011 - Wiltshire Council
West Wiltshire District Plan First Alteration 2011	June 2004	West Wiltshire District Plan adopted 2004
Salisbury Local Plan 2011	June 2003	Salisbury District Local Plan 2011 - Wiltshire Council
Wiltshire & Swindon Minerals Local Plan	November 2001	Minerals Local Plan
Hullavington Neighbourhood Plan 2016 - 2026 (made 2019)	September 2019	Microsoft Word - Hullavington Neighbourhood Plan Referendum Version.docx
Sherston Neighbourhood Plan 2006 to 2026 (made 2019)	May 2019	sppnp-sherston-made-np.pdf
Adopted Malmesbury Neighbourhood Plan (2015)	February 2015	sppnp-made-malmesbury-volume-one-2015.pdf
Joint Melksham Neighbourhood Plan 2 (2025)	August 2025	Joint Melksham Neighbourhood Plan 2
Chippenham Without Neighbourhood Plan 2022 - 2036 (published 2023)	October 2023	C:\Users\hham\AppData\Local\Temp\mso7862.tmp
Chippenham Neighbourhood Plan	May 2024	Chippenham_Neighbourhood_Plan_July_2024updateV2.pdf
Corsham Neighbourhood Plan 2016 - 2026 (May 2019)	November 2019	sppnp-corsham-neighbourhood-plan-made.pdf



Impacts and link to development plan policies

This paper sets out what the Local Authority consider to be the major impacts of the scheme and in order to be helpful to the Examiners'. This document includes in Appendix A, a comprehensive list of relevant policies which includes a simple traffic light system indicating whether the impacts identified in this document largely comply or conflict with policy. Of course it will be the Examiners' prerogative to make these judgements and this has been done simply to be helpful without prejudice.

Topic based identification of impacts





Section 4: Economic and Regeneration

Overview and commentary

The main local impacts of the scheme on the local economy are shown in the table below. The established Plan for job growth set out in the WCS via facilitating growth of existing employers and delivering an attractive investment environment for new inward investment is key to the work of Wiltshire Council. This application is unlikely to help existing businesses meet their aspirations, or provide the right environment for business start-ups, instead disrupting businesses and inconveniencing their customers during the construction and decommissioning phases. This project would reduce visitor numbers to the local area potentially causing job losses in tourism, recreation and the retail sector locally.

The overall impact on tourism will have negative impacts to the economy of the county and is therefore not in accordance with the economy-led policies set out in the WCS.

Summary of main impacts identified by Wiltshire Council

Socio-Economics, Tourism and Recreation Economic Development
(1) Summary of main impacts
Positive impacts – construction phase
<ul style="list-style-type: none"> • Increased employment, applicant states in Environmental Statement Volume 1, 6.1 Chapter 16 Socio-Economics, Tourism and Recreation [APP-068] 194 FTE- with a peak of 558. The applicant considers that could result in 145 jobs for local residents, but with unemployment already low in the area this seems optimistic. Unable to independently verify. • Applicant states an increase in GVA of £21.1M/year GVA to UK economy, and £15.9m GVA to local economy [APP-068]. Unable to independently verify. • Increased spend in hospitality and retail by construction staff. Unable to independently quantify. • Some benefit to local supply chain.
Positive impacts – operational
<ul style="list-style-type: none"> • Increase in GVA of £1.8m/annum [APP-068], but will mainly benefit landowners who are receiving payments.
Positive impacts – decommissioning phase
<ul style="list-style-type: none"> • Increased employment - similar to construction phase. • Increase in GVA – less than construction phase to UK economy, though this does not take inflation into account. • Increased spend in hospitality and retail by construction staff.
Neutral impacts
None identified.
Negative impacts – construction phase
<ul style="list-style-type: none"> • Significant negative impact on tourism and recreational venues – applicant states £1.76m/year with the loss of 50 FTE jobs [APP-068]. • Reduction in visitor numbers to the area, with their associated spend. Unable to quantify. • Likely business closures. • Increased congestion on road network, potential for major disruption and considerable inconvenience to local resident and businesses that use C roads in particular. • Landscape impact, reducing visitor and residents’ enjoyment of the area and potentially affecting local people’s mental health.

Negative impacts – operational
<ul style="list-style-type: none"> • Adverse negative impact on tourism and recreational venues. Applicant states £395,000/year and 11FTE jobs in tourism and associated sectors [APP-068]. Unable to verify. • Potential reduction in visitor numbers to the area, with their associated spend. • Likely business closures. • Landscape impact, reducing visitors’ enjoyment of the area and potentially affecting local people’s mental health.
Negative impacts – decommissioning phase
<ul style="list-style-type: none"> • Significant negative impact on tourism and recreation – similar to construction phase. • Likely business closures. • Increased congestion on road network, potential for major disruption on C roads in particular. • Landscape impact, reducing visitors’ enjoyment of the area and potentially affecting local people’s mental health.

Ranking the economic impacts in importance

All the local impacts identified are considered material to the ExA, but in accordance with the national guidance⁶ the council would indicate the following as the most significant in relation to this theme:

- Increase in GVA to local area, but the increase will only benefit the wider economy during construction, replacement and decommissioning.
- Increase in viability for landowners/farm businesses that benefit from payments for hosting the solar farm.
- Significant negative impact on tourism and recreation throughout the solar farm’s tenure.

Requirements recommended to the Examining Authority to mitigate impact

Should the ExA be minded to recommend approval of this proposal to the Secretary of State then Wiltshire Council would request that the following requirements (conditions) be considered to mitigate the impacts identified above. For the sake of clarity, a full schedule of suggested conditions and reasons are included in Appendix B.

Socio-Economics, Tourism and Recreation Economic Development		Requirement to be discharged by:	
Requirement	Reason	Secretary of State	Wiltshire Council
No part of the authorised development may commence until a comprehensive business survey recording both positive and negative impacts of the scheme has been agreed with Wiltshire Council.	To direct targeted business support to the right sectors in the local area, and to produce an evidence base for use with other similar sized schemes going forward.		Yes
No part of the authorised development may commence until a business response plan has been submitted to and	To ensure agreed plans are in place and ready to be implemented to support local businesses, if needed.		Yes

⁶ National Guidance published in 2024, ‘Nationally Significant Infrastructure Projects: Advice for Local Authorities’

approved by the relevant planning authority. The business response plan must be implemented as approved.			
No battery storage facilities should be installed until Wiltshire Council are satisfied, on advice from Wiltshire and Dorset Fire Service, that fire suppression measures are adequate.	To minimise pollution, minimise impact on businesses and residents should a battery fire occur.		Yes
No part of the scheme should be commenced until a visitor centre providing information on the benefits of the various forms of renewable energy has been approved by Wiltshire Council Economic Development and Development Management teams.	To help encourage local acceptance of the project by; de-mystifying renewable technology, increasing awareness of biodiversity, building trust through school visits, and potentially minimising negative impacts of the scheme on local tourism.		Yes

Section 106 Requirements

Socio-Economics, Tourism and Recreation Economic Development	Reason (including justification for why a condition is not adequate)
None identified.	



Section 5: Archaeology

Overview and commentary

The Wiltshire Council Archaeology Service (WCAS) has a statutory duty to advise the LPA on the impact of development proposals on archaeological remains in the County. Officers take into consideration direct physical impacts on known and potential designated and undesignated heritage assets, issues of setting and visual.

The main impacts of the Lime Down Solar Park proposal are summarised in the following table.

Summary of main impacts identified by Wiltshire Council

Archaeology
(1) Summary of main impacts
Positive impacts – construction phase
None identified.
Positive impacts – operational
None identified.
Neutral impacts
Two archaeological sites that have been scoped out of the development altogether B12-01 and D6-01 (Table 22-2 Summary of Significant Residual Effects (Operation and Maintenance) of 6.1 Environmental Statement Volume 1, Chapter 22 Summary of Residual Effects [APP-074]). An archaeological management plan will ensure that these areas are protected during the operational phase. Some features, such as isolated enclosures and field system ditches, will be avoided via careful placing of solar panels. A programme of public engagement by the archaeological consultants and contractor will disseminate knowledge of the mitigation works to the wider public and improve knowledge of the archaeological resource in the local area and beyond.
Negative impacts – construction phase
A total of 38 archaeological sites has been identified within the proposed development area.
Of this total, five sites have been identified within the Solar Farm in the Environmental Statement and in the subsequent 6.3 Environmental Statement Volume 3, Appendix 12-6 Outline Archaeological Mitigation Strategy [APP-230] which will require mitigation excavations:
<ul style="list-style-type: none"> • B9-01 a Bronze age Round Barrow • C29 – a Roman kiln • C13 – a prehistoric ditch. • D24 – Iron Age / Romano-British settlement site and burial • D1 An Iron Age/Romano-British settlement site
Three Iron age/Romano-British settlement sites (F37, F68 and F85) have been identified within proposed temporary compound sites.
A further 15 sites (B5, F23, F34, F38, F46, F64, F70, F71, F80, F106, F113, F114, F116, F123 and O48) have been identified as likely to require mitigation excavation along the cable route. These consist of Bronze age Barrows, Iron Age/Romano-British settlement sites and medieval settlements. All these sites will require trial trench investigations before confirming this course of action.

Fifteen more sites have been identified by WCAS (Wiltshire Council Relevant Representation [[APP-4934](#)]) following review of the Outline Mitigation Strategy [[APP-230](#)]:

- A7-01 – A SMR excavation will be required for this site
- Sites B6-01 and B9-01 are similar and should both be subject to either non-intrusive works or SMR excavation, to be agreed as part of the approval of the final mitigation strategy
- 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 - Either avoid this ring ditch altogether, or carry out a SMR excavation
- C13 -01 - 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 - Either avoid this ring ditch altogether, or SMR excavation
- D6 – 01 - A SMR excavation will be required for this site
- D6 – 02 - A SMR excavation will be required for this site
- E14 – 01 - Either avoid this ring ditch altogether, or SMR excavation
- E14 – 02 - A SMR excavation will be required for this site
- E20 – 01 - Either avoid this ring ditch altogether, or SMR excavation

Although these mitigation measures can be built in to minimise impacts, the potential adverse impacts cannot be removed completely.

There is an on-going discussion between WCAS and the archaeological contractor on the precise scope and methodology to be employed in placing solar panels in order to avoid features such as the elements of ancient field systems and enclosures. The council considers these features must be avoided in order to minimise negative impacts.

Negative impacts – operational phase

None identified.

Negative impacts – Decommissioning phase

WCAS are pleased to note that the ES has given thought to the impacts, not just of the construction phase, but also the operational phase (which is often dismissed) and the decommissioning phase, although looking ahead to environmental and political conditions in 2085 may prove problematic. It is almost impossible to assess what work will be required to remove the installations in 60 years and what Local Government Authorities will exist to oversee the archaeological implications of such works. The council considers that it is imperative for all commitments to protect archaeology in the decommissioning phase must be sufficiently robust to ensure applicability in 60 years' time and to secure adherence in this future timeframe.

Ranking the Archaeology impacts in importance

All the local impacts identified are considered material to the ExA, but in accordance with the national guidance⁷ the council would indicate the following as the most significant in relation to this theme:

- Romano-British settlement sites noted across the development area
- Neolithic rectangular enclosure located at 386169 182793
- Bronze Age Ring ditches noted across the development area

⁷ National Guidance published in 2024, 'Nationally Significant Infrastructure Projects: Advice for Local Authorities'

- Later prehistoric stock enclosures and field systems

Requirements recommended to the Examining Authority to mitigate impact

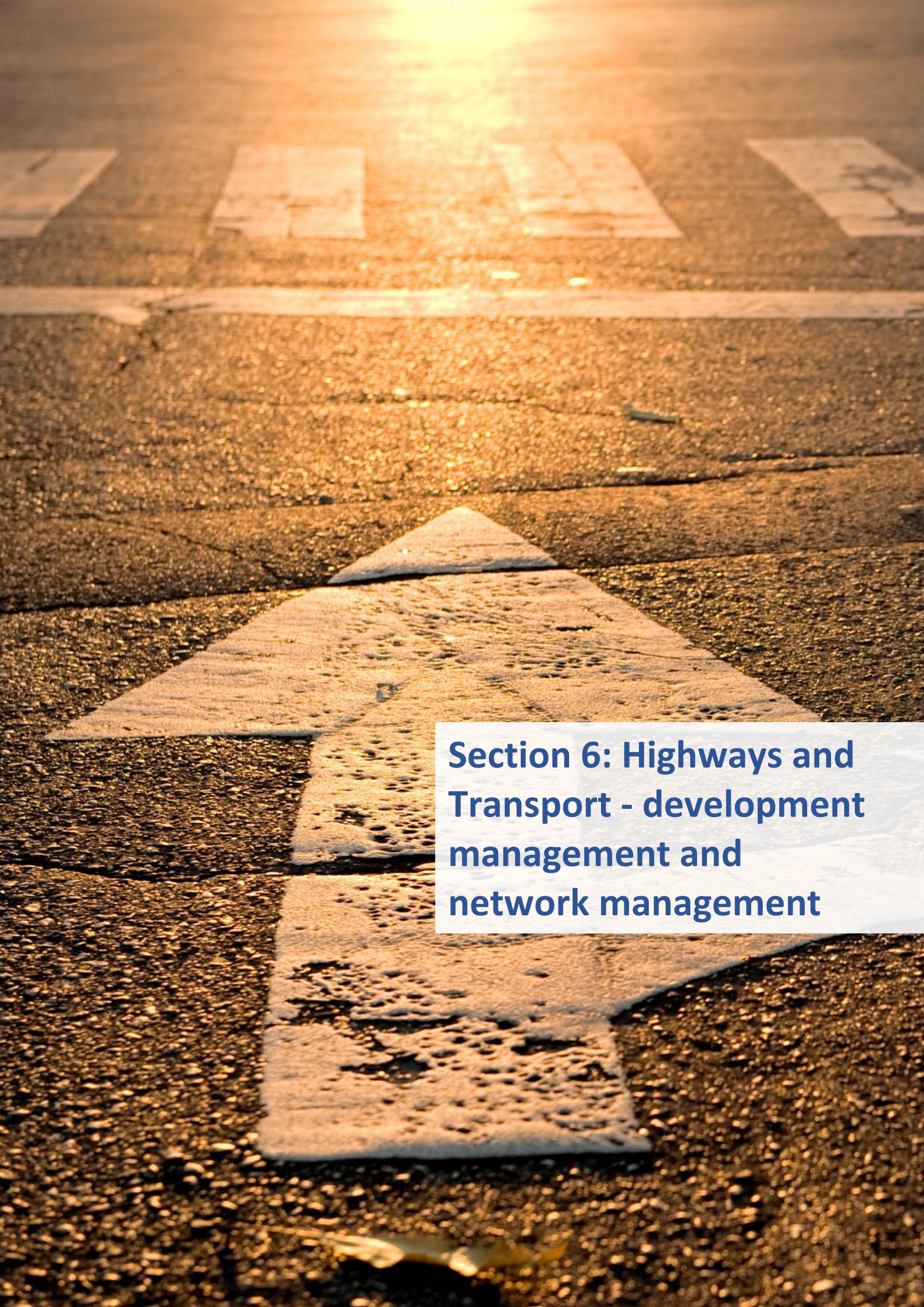
Should the ExA be minded to recommend approval of this proposal to the Secretary of State then Wiltshire Council would request that the following requirements (conditions) be considered to mitigate the impacts identified above. For the sake of clarity, a full schedule of suggested requirements (conditions) and reasons are included in Appendix B.

Archaeology		Requirement to be discharged by:	
Requirement	Reason	Secretary of State	Wiltshire Council
<p>No development shall commence within the area indicated by application until:</p> <p>A Detailed Archaeological Management Strategy (DAMS), setting out a methodology for the excavation and recording of archaeological sites during the construction phase of the development, has been submitted to and approved by the Local Planning Authority. <i>(If such a document has not already become a certified document as part of the application, as is Wiltshire Council's preferred position).</i></p>	<p>To secure an agreed archaeological strategy and methodology in response to impacts upon the archaeological resource from the proposed development.</p>		<p>Yes</p>
<p>No development shall commence within the area indicated by the application until:</p> <p>a) A written programme of archaeological investigation, which should include on-site work and off-site work such as the analysis, publishing and archiving of the results, has been submitted to and approved by the Local Planning Authority; and</p>	<p>To enable the recording of any matters of archaeological significance.</p>		<p>Yes</p>

Archaeology		Requirement to be discharged by:	
Requirement	Reason	Secretary of State	Wiltshire Council
b) The approved programme of archaeological work has been carried out in accordance with the approved details. This programme is to be completed within 3 years after the completion of on-site archaeological work.			
<p>No development shall commence within the area indicated by application until:</p> <p>a) An Archaeological Management Plan, setting out a methodology for protecting archaeological sites that have been scoped out of the development as well as those within the development footprint that need to be protected during the construction phase of the development, has been submitted to and approved by the Local Planning Authority; and</p> <p>b) The programme of protection has been carried out in accordance with the approved details.</p>	To enable the protection and preservation of sites of archaeological significance.		Yes

Section 106 Requirements

Archaeology	Reason (including justification for why a condition is not adequate)
None identified.	



**Section 6: Highways and
Transport - development
management and
network management**

Development Management

Overview and commentary

Concerns are raised about the impact of construction traffic on narrow rural roads. Predicted HGV volumes (up to 80 two-way movements daily on some routes) pose safety and congestion risks, as these roads lack adequate passing opportunities and no mitigation has been proposed. There is also a risk of verge damage, amenity impacts near residential properties, and uncertainty over additional traffic for spoil removal.

Wiltshire Council is further concerned about limited control over highway works under the DCO, which could lead to future liabilities and safety issues. Robust measures, including detailed traffic management plans, passing improvements, formal highway agreements, and condition surveys, are required.

Summary of main impacts

Highways – Development Management
(1) Summary of main impacts
Positive impacts – construction phase
There are not considered to be any positive highway impacts associated with the construction of the Solar PV sites. This will lead to regular HGV trafficking on several minor rural roads serving as the proposed construction traffic routes to Lime Down areas A-C and Lime Down D, where the carriageway width is narrow and inadequate for even car/HGV passage along certain sections.
Positive impacts – operational
Broadly neutral. Whilst there will be some additional trafficking associated with routine maintenance and/or replacement of solar farm components, this is expected to be occasional with limited impact on highway operation. Any highway mitigation left in place to improve passing opportunities on the minor roads could serve to benefit general traffic operation post-construction.
Positive impacts – decommissioning phase
See impacts above on construction phase impacts. Decommissioning of the Solar PV site infrastructure will lead to necessary HGV trafficking along the same minor rural roads.
Neutral impacts
None identified.
Negative impacts – construction phase
6.3 Environmental Statement Volume 3, Appendix 13-1 Transport Assessment [APP-233] and expressly Annex H 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 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 opportunities for two opposing HGVs in 6.3 Environmental Statement Volume 3, Appendix 13-1 Transport Assessment [APP-233], which given the level of predicted HGV trafficking associated with Lime Down area D is a very real concern. HGV/Car swept path passage

analysis presented for Alderton Road and Fosse Way again show 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 areas A-C, there is a concern that no assessment has been done to consider passage opportunities for two opposing HGVs. 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. Negative impacts will be associated with regular HGV trafficking along several minor rural roads serving as the proposed construction traffic routes to Lime Down areas A-C and Lime Down D, where the carriageway width is narrow and inadequate for even car/HGV passage along certain sections. As noted below under (2) 'Main Impacts', concerns 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. These damage risks could include total structural pavement failure where the construction depth of the more minor roads proposed for HGV construction access is thin, and so not potentially designed or adequate for sustained heavy vehicle axle loadings. In short, highway damage and remedial costs could be very substantive and widespread and not necessarily limited to verge over-run or edge damage. The 7.22 Outline Construction Traffic Management Plan [APP-287] proposes that pre-construction condition surveys would be undertaken, albeit the extents are still to be agreed. However, if the baseline condition is poor in certain locations, then it is conceivable that an unacceptable level of damage could occur with HGV trafficking during the construction phase. It is unclear what the applicant would be required to do under the DCO in this circumstance during the construction phase, so short-term remedials necessary to make the highway safe. It should not fall on Council budgets to do this.

Regular extra-ordinary HGV trafficking over the entirety of the construction period will also have an amenity impact on roads identified as 'sensitive' in the Environmental Statement, so where receptors such as residential properties are close to the road edge.

The proposed temporary accesses needed (25 number) needed along the cable route corridor impact on roads of different standards but will include a need for temporary traffic management (TTM) on major routes such as the A420 and the A4 Bath Road. This can be expected to create some operating and delay impacts where roads are heavily trafficked, even accepting that most of these temporary accesses will not be needed for a significant length of time. Specific operating impacts will also depend on the specific form of the TTM, such as any need for 'shuttle' or one-way working on the major roads affected by the cable cross-over works.

Volumes of HGVs

HGV types and numbers are set out in Table 13-12 in 6.3 Environmental Statement Volume 3, Appendix 13-1 Transport Assessment [APP-233] and Table 13-20 in 6.1 Environmental Statement Volume 1, Chapter 13 Transport and Access [APP-065]. This table shows the overall numbers of HGV movements expected during the construction phases for each Lime Down area (A-E), with daily volumes then estimated based on the construction period for each. There is still some clarification sought on these estimates following DCO application document review. The supporting calculations undertaken for Modules and Mounting Structures for each Lime Down site have not been fully provided or verified by evidence from existing solar farms sites. For example, whilst the total number assumed PV Modules for each of the Lime Down sites (A-E) is stated, it is unclear how these quantities have been derived. The area occupied by panels on each site will be known (Works Area 1), but the density/ha assumed and how this compares with the assumptions adopted for other consented solar farm sites or those in operation is unknown. The same query applies to

module mounting structures. Assumptions made regarding the type of mounting structures or foundations / supports are also absent. Similarly, aggregate volumes are not determined on a Lime Down site-by-site basis, or on what basis, so the total access track lengths and their width/depth of construction. It is further noted the 'waste' calculations account for only removal of packaging, so seemingly exclude any allowance for removal of excavated material associated with the construction of the access trackways, the construction compounds 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 the worst case scenario must be clarified.

Notwithstanding the above, the HGV volume figures as presented in 6.3 Environmental Statement Volume 3, Appendix 13-1 Transport Assessment [APP-233] estimate that the minor road route via Bradfield Cottages will see around 70-80 two-way movements per day associated with the construction of Lime Down area D. Furthermore, as Lime Down areas A-C could all be under construction at the same time at a certain point according to the proposed programme, the cumulative daily HGV movements could be around 50 on Alderton Road and Fosse Way. These increases in heavy vehicle movements on the minor roads are notable impacts, particularly when viewed in overall terms over the full construction period. It also highlights the concerns expressed with passage opportunities for two HGVs on the minor roads forming the construction routes, and the likelihood that opposing HGVs could meet despite attempts to manage arrivals and departures in site specific 7.22 Outline Construction Traffic Management Plans [APP-287].

Ability to Control Design and Execution of Highway Works under conferred DCO Powers

The council's Highways and Transport officers remain concerned over the ability of the council to satisfactorily control works being undertaken within the public highway, notably our normal powers to assure that proposed site access and other construction works will meet the council's adoptable standard. Section 2.3 of 7.22 Outline Construction Traffic Management Plan [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 Road Safety Audit (RSA). Whilst this is welcomed, it is not considered a substitute for 'requiring' bespoke highway agreements under Article 15 of 3.1 Draft Development Consent Order [APP-016] 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 additionally 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.

Whilst this may not seem a bespoke 'network impact', it could become one if highway works being implemented by the undertaker are not properly managed and the council has ineffective powers to intervene or take corrective action. Furthermore, poor design or quality of constructed works could lead to a future maintenance liability on the council to correct or potentially create safety risks for highway users.

Negative impacts – operational

Broadly neutral. See above comments under 'Positive' impact outcomes.

Negative impacts – decommissioning phase

See comments above on the negative construction phase impacts. Decommissioning of the Solar PV site infrastructure will lead to necessary HGV trafficking along the same minor rural roads.

Ranking the Highways Development Management impacts in importance

All the local impacts identified are considered material to the ExA, but in accordance with the national guidance⁸ the council would indicate the following as the most significant in relation to this theme:

HGVS Construction Routes and Two-Way Passage

In summary, the concerns based on the analyses 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 analyses show, could happen with HGV/car passage along many sections where the carriageway width is inadequate to accommodate even this. It is noted 7.22 Outline Construction Traffic Management Plan [APP-287] does include a section on ‘Road Condition Surveys’ stating that: “*The extent of the survey will be agreed with the local highway authority prior to commencement and as part of the Final CTMP*”. It is considered this need for monitoring could be extensive in view of the above. However, it would seem preferable to put in place suitable passing improvements at outset, rather than accept significant highway damage as a risk to be addressed later, this assuming liability by the undertaker is accepted and not disputed.

Volumes of HGVs

The proposal will result in a substantial increase in HGV traffic on minor rural roads during construction, with up to 70–80 two-way movements per day on the Bradfield Cottages route and around 50 daily movements on Alderton Road and Fosse Way if multiple areas are built concurrently. These volumes raise concerns about congestion and safety due to limited passing opportunities for large vehicles. Additionally, there is uncertainty over the disposal of excavated material from access tracks and substation foundations, which could lead to further HGV movements if off-site removal is required. Overall, the key impacts are increased heavy vehicle traffic on sensitive routes, potential cumulative effects, and operational challenges in managing vehicle movements.

Ability to Control Design and Execution of Highway Works under conferred DCO Powers

The requirement to submit and approve detailed design information is not an adequate substitute for formal highway agreements under Article 15 of 3.1 Draft Development Consent Order [APP-016] for all works within the public highway. These agreements should cover technical approval of permanent highway designs and include provisions such as bonds, indemnity for Wiltshire Council, and inspection and sign-off during construction. Without such agreements or comprehensive protective provisions for the benefit of the local highway authority, poorly managed works could leave the council unable to intervene, creating future maintenance liabilities or safety risks for road users.

Requirements recommended to the Examining Authority to mitigate impact

Should the ExA be minded to recommend approval of this proposal to the SoS then Wiltshire Council would request that the following requirements (conditions) be considered to mitigate the impacts

⁸ National Guidance published in 2024, ‘Nationally Significant Infrastructure Projects: Advice for Local Authorities’

identified above. For the sake of clarity, a full schedule of suggested conditions and reasons are included in Appendix B.

Highways – Development Management		Requirement to be discharged by:	
Requirement	Reason	Secretary of State	Wiltshire Council
<p><i>CONDITION - CTMP</i></p> <p>No development shall commence on the specific Lime Down PV sites until detailed Construction Traffic Management Plans (CTMP), together with site plans, have been submitted to, and approved in writing by, the Local Planning Authority. These shall include the following:</p> <ol style="list-style-type: none"> 1. provision for the on-site parking of vehicles for site operatives and visitors. 2. provision for the loading and unloading of plant and materials, including turning areas sufficient for accommodating articulated HGVs and AIL vehicles as required. 3. provision for the storage of plant and materials used in constructing the development. 4. the erection and maintenance of security hoarding including decorative displays and facilities for public viewing, where appropriate. 5. locations of wheel washing facilities. 6. measures to control the emission of dust and dirt during construction. 7. a scheme for recycling/disposing of waste resulting from demolition and construction works. 8. measures for the protection of the natural environment. 9. hours of construction, including delivery schedules. 10. traffic routeing signs and HGV turning warning signs (including signage drawing(s)), and associated trimming of vegetation. 11. pre-condition photo surveys (See Informative). 12. details of the proposed highway works proposed in any access route lengths defined as ‘Highway Improvement Areas’ (HIA). 	<p>REASON:</p> <p>To minimise detrimental effects to the neighbouring amenities, the amenities of the area in general, detriment to the natural environment through the risks of pollution and dangers to highway safety, during the construction phase.</p>		Yes

Highways – Development Management		Requirement to be discharged by:	
Requirement	Reason	Secretary of State	Wiltshire Council
<p>NOTE: The proposed extent of the HIA lengths in the draft DCO and potential passage mitigation for two HGVS which might be needed on minor roads outside of this is a point of contention as noted.</p> <p>The development shall not be carried out otherwise than in accordance with the approved construction traffic management plans without the prior written permission of the local planning authority.</p> <p>INFORMATIVE <i>Pre-condition Survey Extents</i> Photographic pre-condition highway surveys are to be carried out for the following lengths of highway with copies of pre and post condition surveys to be supplied to Wiltshire Council:</p> <ul style="list-style-type: none"> • Lime Down A-C: Alderton Road, Fosse Way and the unnamed road between the Lime Down A access points 5 and 6 and the junction with Fosse Way. • Lime Down D: The route from Dyson Roundabout via Bradfield Cottages to the Lime Down D access points 7, 8 and 20 <p>The applicant should be informed that the Highway Authority will pursue rectification of any defects identified by the highway condition survey which can be attributed to the site construction traffic under the provision of S59 of the Highways Act 1980. As such, the undertaker will be required to enter into a bespoke s59 Agreement with the Highway Authority to formalise arrangements.</p>			
<p><i>CONDITION - Solar PV Sites: Construction Accesses</i> No existing or proposed accesses to be used for construction of the Solar PV sites (Lime Down areas A-E) shall be brought into use for such purpose until full details have been</p>	<p>REASON: In the interests of highway safety.</p>		Yes

Highways – Development Management		Requirement to be discharged by:	
Requirement	Reason	Secretary of State	Wiltshire Council
<p>submitted to and approved in writing by the Local Planning Authority.</p> <p>These details shall include any proposed re-instatement works where any access or the upgrade works to it is deemed temporary and so needs to be returned to the pre-construction state at the end of the Construction Phase.</p> <p>INFORMATIVE</p> <p>This applies to access references 1-4, 4a, 4b, 5-17, 17a, 17b, 18-21 as shown on 6.2 Environmental Statement Volume 2, Figure 13-11 Construction</p> <p>Access Locations: Solar PV Sites [APP-156]</p>			
<p><i>CONDITION - Solar PV Sites: Operational Only Accesses</i></p> <p>None of the additional Operational Only accesses to the Solar PV sites (Lime Down areas A-C and E) shall be brought into use for such purpose until full details have been submitted to and approved in writing by the Local Planning Authority.</p> <p>INFORMATIVE</p> <p>This applies to access references 201-209 as shown on 6.2 Environmental Statement Volume 2, Figure 13-13 Operational Only</p> <p>Access Locations: Solar PV Sites [APP-158].</p>	<p>REASON: In the interests of highway safety.</p>		Yes

Section 106 Requirements

Highways – Development Management	Reason (including justification for why a condition is not adequate)
None identified.	

Network Management

Overview and commentary

The 3.1 Draft Development Consent Order (DCO) [\[APP-016\]](#) raises significant concerns. The most critical issue is the proposed rescinding or dilution of statutory powers under legislation such as the New Roads and Street Works Act 1991 (NRSWA), the Road Traffic Regulations Act 1984 (RTWA) and the Traffic

Management Act 2004 (TMA). These changes would undermine the council’s ability to coordinate works, warn and inform the travelling public, protect highway assets, and enforce reinstatement standards.

The impact on the travelling public could mean:

- Multiple uncoordinated works affecting people’s ability to navigate around the network in a planned way;
- Negatively affecting the expeditious movement of traffic on the local highway network by creating unpredictable journey times, leading to:
 - Missed appointments,
 - Slower blue light response times, and
 - Lack of adherence to public transport timetables.
- Public confidence and trust in the council’s ability to coordinate and manage works on the highway takes a long time to garner, and is very easily lost; and
- Complaints would increase.

Additional concerns include the proposal for expedited road closures with minimal notice in direct conflict with national best practice. This proposal will not allow time to advertise the road closures twice in local papers and therefore undermines the current legal framework which ensures the local community is able to comment and / or object to any proposed closure. The closure might also propose to close routes the council have already reserved to accommodate other closures on the local highway network, unrelated to the Lime Down Solar Park works.

There is also lack of clarity on responsibilities for cable maintenance post-construction, and insufficient provisions for managing abnormal loads and mitigating damage from heavy vehicles. Further impact to the public could be poorly reinstated openings in the highway if the Specification of Openings in the Highway (SROH) is not adhered to, which could result in early trench failure and the need for repeat works and consequential disruptive traffic management while those works are rectified.

Overall, the council’s Network Management officers have concerns about the proposal in its current form, emphasising that these altered measures are unnecessary and risk compromising established best practices that ensure safety, quality, and network efficiency. The council has a proven record of collaborating with promoters under existing frameworks, and the draft DCO’s approach, which would be to grant powers to override these frameworks, would create operational challenges and expose the highway network to avoidable risks and cause reputational damage to the council’s reputation.

Summary of main impacts

Highways - Network Management
(1) Summary of main impacts
Positive impacts – construction phase
None identified.
Positive impacts – operational
None identified.
Positive impacts – decommissioning phase
None identified.

Neutral impacts

None identified.

Negative impacts – construction phase

Concerns about rescinding powers under the New Roads and Street Works Act 1991 (NRSWA)

The proposed changes to existing legislative frameworks that the draft DCO [APP-016] seems to require would undermine the council's ability and responsibility to work with all scheme promoters when fulfilling its network management duties. It would essentially create a two-tier system, creating one set of rules for the Lime Down Solar Park scheme and another for all other works on the local highway network within Wiltshire. The local authority (especially the Network Management Team) have a track record for working collaboratively with promoters of large infrastructure projects within the existing legal framework and consider that it would be untenable to have different sets of rules for different promoters on its network. Therefore, the council considers that it is necessary to retain control over all works.

The impact on the travelling public could mean:

- Multiple uncoordinated works affecting people's ability to navigate around the network in a planned way;
- Negatively affecting the expeditious movement of traffic on its network by creating unpredictable journey times, leading to:
 - Missed appointments,
 - Slower blue light response times,
 - Lack of adherence to public transport timetables.
- Public confidence and trust in the council's ability to coordinate and manage works on the highway takes a long time to garner, and is very easily lost;
- Complaints would increase.

Wiltshire Council runs a very robust network management regime with clear procedures around permitting, NRSWA, RTRA and TMA, and have a good track record of working with promoters to achieve their infrastructure projects. This regime and its procedure, reflect clear national rules of engagement, and the proposed powers the Applicant is seeking in the draft DCO [APP-016] would compromise the council's ability to control works and quality of reinstatements in the area (including the cable corridor). The local authority must ensure that all operators on the council's network, comply with all relevant codes of practice and procedures, otherwise this would have a significant impact on the public as set out above.

1. Concerns over Road closure in the DCO

The draft DCO [APP-016] as currently drafted, suggests that road closure orders could take effect in as little as a month – this would therefore involve the applicant rescinding Section 14 of the Road Traffic Regulation Act 1984, a process that has nationally been fine-tuned over the years. It would negatively impact the time for advertising and appropriate consultation and notification of key stakeholders, including parish councils, the blue light services and public transport. Normal engagement and regular update meetings with the Network Management Team is the standard operating procedure with larger infrastructure projects and this process has been implemented successfully on previous schemes. The local authority cannot manage its highway network effectively when different sets of rules affect a swath of the county's network. The impact to the travelling public would be a lack of notice or ability to feedback through consultation on concerns over a proposed closure. Insufficient time would be left to amend public transport timetables, and blue light services ability to make alternative routing arrangements for their response vehicles. The council considers that the revised timescales

sought in the draft DCO are unnecessary if the applicant is able to plan ahead and follow a programme of works.

2. Concerns over controlling reinstatement (the council's asset)

It is currently unclear as to whether the applicant is proposing to agree inspection units with the council, which is something that all local authorities do for all utilities and Section 50 license holders as set out in the Code of Practice for Inspections. The impact of diverging from existing best practice would be that Wiltshire Council would have to arrange themselves to undertake the adherence to the Safety Codes and the Specification of Reinstatement of Openings in the Highway 5th Edition (SROH) to ensure the site was safe and the reinstatement was done correctly to avoid the public purse having to fund any repairs for early failure. This ensure site safety and that the road is reinstated to regulated standards set out in SROH.

3. Network Management Duties

The draft DCO [[APP-016](#)] does not clearly indicate how the DCO would dovetail with the council's Network Management Duties under Section 16 of the Traffic Management Act (TMA). The TMA strengthened the council's powers to coordinate all works and activities on the highway to ensure the expeditious movement of traffic on the council's network and the networks of neighbouring authorities. The council considers that the applicant cannot work in isolation otherwise the council's ability to coordinate works on a large swathe of Wiltshire's network would be compromised. The impact of this would be that other promoters may seek compensation for the council not being reasonable in allowing their planned works to go ahead if the DCO contractor chose to start works of their own that meant other planned works permits had to be revoked. This would lead to confusion, complaints and a lack of trust in the council's ability to coordinate all works and events on its network.

4. Management of AILs (Abnormal and Indivisible Loads)

The local authority doesn't consider that the management of AIL's is adequately covered in the draft DCO [[APP-016](#)] or accompanying outline management plans. Whilst there is mention of liaising with Highways, it is the council's Network Management Team that manage this process on Wiltshire's network. The council acknowledges that there will need to be road closures in association with these deliveries, therefore closure orders will need to be in place. Wiltshire Council are used to doing "blanket" orders for works that are planned but are weather dependant. Wiltshire Council procedures are that they check whether the routes have any weak structures on the proposed route that might make that route unsuitable, so the haulier must work with Wiltshire Council through established procedures in managing these movements.

The impact of this not being managed properly is:

- Damage to the county's structures,
- Reduction in the serviceable life of those structures, account isn't taken of Sites of Engineering Difficulty (SED) on the local highway network
- Possible closures to do urgent and permanent repairs which will then negatively impact the travelling public.

5. Damage to the highway by heavy and oversized vehicles.

The draft DCO [[APP-016](#)] does not currently cover the matter of damage to highways (including verges) as a consequence of the scheme's heavy equipment, deliveries and sheer percentage increase of extra traffic throughout the project construction phase. The verges will suffer noticeably because of the lack of passing places on some of the access roads with the present passing bays being very far apart. Section 59 of the Highways Act 1980 covers this, and this is covered in greater detail in the section above. The council proposes that perhaps passing bays

should be constructed prior to the start of the project under a S278, or suitably robust protective provisions for the protection of local highway authorities within the draft DCO, and this is currently being discussed with the applicant.

Negative impacts – operational

Clarification is required as to who will be responsible for the cable under the road once it is operating. If there is a fault with this cable, whilst it is acknowledged that the repair could be undertaken under the DCO, the local authority would still need to coordinate and control essential works as set out above.

Negative impacts – decommissioning phase

As above.

Ranking the Highways- Network Management impacts in importance

All the local impacts identified are considered material to the ExA, but in accordance with the national guidance⁹ the council would indicate the following as the most significant in relation to this theme:

The proposed rescinding of established laws, regulation and best practice that ensures all works are coordinated and reinstatements are done correctly is not considered necessary and would be detrimental to the council’s ability to fulfil its network management duties. The Network Management team work positively with all promoters to ensure essential works are undertaken, however there is a need to ensure that all works comply with the New Road and Street Works Act 1991, Traffic Management Act 2004, Road Traffic Regulation Act 1984, Road Vehicle (construction & use) Regulations 1986 or Road Vehicles (Authorisation of Special Types) (General) Order (STGO), 2003.

Requirements recommended to the Examining Authority to mitigate impact

Highways - Network Management		Requirement to be discharged by:	
Requirement	Reason	Secretary of State	Wiltshire Council
None identified at this stage due to the expectation that the impacts identified above will be addressed through the inclusion of protective provisions for the benefit of the local highway authority within the draft DCO and through further amendments to the proposed management plans. However, should these negotiations prove unsuccessful, the council reserves the right to seek additional requirements during the examination.	To ensure all the normal rules and regulations are in place to protect the highway asset and that coordination with all the normal works across the network are undertaken in the usual thorough way – the council cannot have two sets of different rules for works on its network and must ensure any reinstatements are undertaken to the specified standard to protect the public purse from early failure of trenches.		Yes

⁹ National Guidance published in 2024, ‘Nationally Significant Infrastructure Projects: Advice for Local Authorities’

Highways - Network Management		Requirement to be discharged by:	
Requirement	Reason	Secretary of State	Wiltshire Council
<p>Amended provision is required in relation to:</p> <ul style="list-style-type: none"> • The permitting scheme and any possible future Lane Rental Scheme • The Council's network management duties • Adherence to Specification for Reinstatement of Openings of Highways • Adherence to Inspection Code of Practice • Adherence to Section 14 of the Road Traffic Regulation Act 1984 			

Section 106 Requirements

Highways - Network Management	Reason (including justification for why a condition is not adequate)
None identified.	



Section 7: Public Rights of Way (PRoW)

Overview and commentary

The proposed development presents both opportunities and challenges for the Public Rights of Way (PRoW) network. Positive impacts include potential surface improvements to access tracks and opportunities for Section 106 contributions to enhance connectivity and accessibility, including new permissive routes for walkers, cyclists, and equestrians. However, concern is identified around issues relating to visual amenity, noise, and construction impacts, including temporary closures, diversions, and increased traffic on narrow rural roads and bridleways, which may create safety risks and conflicts between users and construction vehicles.

To mitigate these impacts, Wiltshire Council recommends measures such as replacing stiles with gates, improving bridges for accessibility, installing additional waymarking, conducting condition surveys, and providing passing bays on bridleways and unclassified roads. A Section 106 contribution of £20,000 per annum is also sought to improve PRoW outside the site boundary and maintain network quality over the project’s lifespan. These steps aim to balance the development’s operational needs with safeguarding public access and enjoyment of the countryside.

Summary of main impacts

Public Rights of Way
Positive impacts – construction phase
Surface improvements to the access tracks will provide a better surface for some user groups, e.g. pedestrians and cyclists and horse riders. The tracks should have a camber on them to help rainwater flow off the track rather than pooling on it.
Positive impacts – operational
Opportunity to secure section 106 contributions to improve the Public Rights of Way network. With improvements to the infrastructure making the PRoWs more accessible and inclusive to users with different access requirements, for example users with mobility aids. If a section 106 contribution is achieved, then the council would have the opportunity to divert some of the offsite PRoW onto routes that would provide a more connected network and help to make a network which is suitable for the current demands of users. A reasonable section 106 would allow compensation to be paid to landowners should the diversion require more land than the existing route or if it was for a new PRoW. The development will provide additional permissive routes for pedestrians, cyclists and equestrians. The change of land use may provide a more accessible surface during winter months with a grass surface being easier to walk on than bare soil which has been subject to the arable farming cycle. The paths will no longer be subject to the ploughing and cropping cycle which means a less disturbed surface for the PRoW.
Positive impacts – decommissioning phase
Decommissioning works should lead to improvements to any PRoW or unclassified road that are used for access during the decommissioning work (potholes filled / tracks regraded). The return of the land to agricultural use may mean that new access furniture will be required, which should be of the most accessible type (this would not strictly be an improvement as a gap is being replaced).
Neutral impacts
While some users will not enjoy using the Public Rights of Way within the sites due to tranquillity and adverse visual effects, the change in land use provides an opportunity for those less confident walking through livestock to use those paths.

Negative impacts – construction phase

Increased noise during construction, extra traffic on the narrow country roads which are shared with more vulnerable users and the increased traffic on the unclassified roads and Bridleways creating safety concerns for users. Temporary closure and diversion of two Public Rights of Way, namely GRIT20 and MALW54, during construction of the cable route and compounds.

Negative impacts – operational

Visual amenity and enjoyment of using the PRoW network by users, including a change in noise levels produced by this development over the normal agricultural noise that you would expect.

Negative impacts – decommissioning phase

This will be similar to the construction phase. Decommissioning traffic on the highway network to access the site, which will impact on users accessing the PRoW network. Noise, dust and/or mud, depending on the time of year, could be an issue from the work. The possibility that PRoW will be temporarily closed (temporary alternative routes must be made available where possible).

Ranking the Public Rights of Way impacts in importance

All the local impacts identified are considered material to the ExA, but in accordance with the national guidance¹⁰ the council would indicate the following as the most significant in relation to this theme:

- Reduction in visual amenity (setting of Public Right of Way)
- Increase in noise
- Impact on usability of PROW network during construction, operation (replacement) and decommissioning phases
- Possible conflicts and safety implications between PRoW users using the highway network to get to PROW

Requirements recommended to the Examining Authority to mitigate impact

Should the ExA be minded to recommend approval of this proposal to the SoS then Wiltshire Council would request that the following requirements (conditions) be considered to mitigate the impacts identified above. For the sake of clarity, a full schedule of suggested requirements (conditions) and reasons are included in Appendix B.

Public Rights of Way		Requirement to be discharged by:	
Requirement	Reason	Secretary of State	Wiltshire Council
No part of works may commence until detailed design has been submitted to and approved by the LPA showing all stiles removed from within the red line of Lime Down A,B,C,D and E to be replaced by	Reason: To meet Wiltshire Council's Equalities Act obligations.		Yes

¹⁰ National Guidance published in 2024, 'Nationally Significant Infrastructure Projects: Advice for Local Authorities'

Public Rights of Way		Requirement to be discharged by:	
Requirement	Reason	Secretary of State	Wiltshire Council
gates only if livestock is present. The authorised development must be carried out in accordance with the approved details.			
No part of works may commence until detailed design has been submitted to and approved by the LPA showing bridges over natural and man-made water courses to be replaced with more accessible solutions. The authorised development must be carried out in accordance with the approved details.	Reason: To meet Wiltshire Council's Equalities Act obligations.		Yes
No part of works may commence until detailed design has been submitted to and approved by the LPA showing waymarking to be installed at any change of direction and entry points where a permissive path or Public Right of Way is located. The authorised development must be carried out in accordance with the approved details.	Reason: To allow easy navigation of the Public Rights of Way network.		Yes
No part of works may commence until detailed design has been submitted to and approved by the LPA showing a pre-condition survey is to be carried out of any Public Right of Way or unsealed public highway prior to commencement of the development. The authorised development must be carried out in accordance with the approved details.	Reason: To monitor the surface condition of the PRoW and identify any areas where reinstatement/repair of the surface is required during the life of the development which can be attributed to damage caused by the applicant undertaking activities required for the construction and ongoing maintenance of the solar park as well as its decommissioning.		Yes

Public Rights of Way		Requirement to be discharged by:	
Requirement	Reason	Secretary of State	Wiltshire Council
No part of works may commence until detailed design has been submitted to and approved by the LPA showing regular passing bays to be provided on any Public Bridleway or unclassified road which is being used by construction traffic. The authorised development must be carried out in accordance with the approved details.	Reason: In the interests of public safety by providing a safe place for more vulnerable users to wait for vehicles to pass and vice versa.		Yes
No part of works may commence until detailed design has been submitted to and approved by the LPA showing bridges over natural watercourses to be upgraded where appropriate. The authorised development must be carried out in accordance with the approved details.	To address the likelihood of quicker surface water runoff from the proposal to meet Wiltshire Council's Equalities Act obligations.		Yes

Section 106 Requirements

Public Rights of Way	Reason (including justification for why a condition is not adequate)
A section 106 contribution of £20,000 per annum index linked should be paid annually.	This contribution is required to improve Public Rights of Way outside of the red line boundary which will receive additional usage from members of the public wishing to enjoy the PRow network within a more traditional landscape setting. The sum is requested so that new routes can be created to help to link up PRow. To divert PRow to provide routes which reduce conflict between land managers and the public. This contribution would allow for those most affected by the development to have a PRow network which could still meet their needs and be accessible to as many users as possible. It is suggested that the money is to be spent on public footpaths within 2km of the red line boundary of Lime Down A,B,C,D

Public Rights of Way	Reason (including justification for why a condition is not adequate)
	<p>and E and 3km for other PRow. After 20 years this is to be expanded to cover footpaths with 3km and other PRow within 4km after 40 years this area should be increased to cover footpaths within 4km and other PRow within 5km. If the development time scale is extended then the contributions should continue' on the same basis as they had been and a further increase of 1km per 10 years for the area where the funding can be spent.</p>



Section 8: Landscape and Visual

Overview and commentary

Wiltshire Council has regulatory responsibility for managing Wiltshire’s natural environment and landscape.

Development Plan policies considered primary and material to consideration of landscape and visual matters for this project include Core Policy 51 (Landscape) of the WCS, and Policy 91 (Conserving and enhancing Wiltshire’s Landscapes) of the WLP Reg 19 Pre-submission Draft (2023). Both policies seek to protect, conserve and where possible enhance Wiltshire’s distinctive landscape character.

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’. There is also conflict with Wiltshire Core Strategy, Policy CP42 (i) which is a listed policy factor requiring specific landscape resolution particularly in and around AONB’s (now referred to as National Landscapes).

It is the Council’s view that the project will have a significant harmful impact on landscape character due to its contrasting nature with the existing baseline situation and the huge scale of land use change proposed, impacting an extensive area of high quality and relatively tranquil, highly rural, unspoilt Limestone Lowland countryside, which provides important setting and amenity functions to the Cotswolds National Landscape and for numerous small highly distinctive Limestone settlements.

The overall impact on the unique character of the Limestone Lowland Landscape Character will be significantly negative across all phases of the project.

The main impacts of the Lime Down Solar Park proposal are summarised in the table below.

Summary of main impacts identified by Wiltshire Council

Landscape and Visual - ES Chapter 8
(1) Summary of main impacts
Positive impacts – construction phase
<p>Visual Impacts None identified for Lime Down Areas A to E or for the CRC.</p> <p>Landscape Impacts None identified for Lime Down Areas A to E or for the CRC.</p>
Positive impacts – operational
<p>Visual Impacts None identified for Lime Down Areas A to E or for CRC.</p> <p>Landscape Impacts <i>Landscape Fabric:</i> There is likely to be a slight positive impact for some landscape fabric components (hedgerows, hedgerow trees, ponds, and pastoral land cover) if embedded ecology and landscape mitigation and enhancement measures are appropriately designed (in detail), successfully established, maintained and managed in accordance with an approved LEMP throughout the operational life of development.</p>

Physical Public Rights of Way network (byways, bridleways, footpaths). There may be a slight positive impact arising from the creation of new additional and linking 'permissive' Public Rights of Way routes in terms of increasing opportunities to access countryside for informal recreation, although it should be noted that user's experiential / perceptual experience of rural countryside would be negatively influenced by the contrasting nature and scale of the introduced operational energy infrastructure and ancillary development to varying degrees.

Landscape Character:

None identified for Lime Down Areas A to E or for CRC.

Positive impacts – decommissioning phase

Visual Impacts

None identified.

Landscape Impacts

Landscape Fabric:

Post decommissioning, there could be slight positive impact for soft landscape fabric components (new hedgerows, hedgerow trees, woodlands and ponds) if character supporting mitigation and enhancement planting measures are retained at the end of decommissioning phases for Lime Down Areas A to E, as a landscape legacy of the project.

Landscape Character:

Post decommissioning, following removal of all introduced above ground energy infrastructure components and restoration of the land back to farming land use or alternative appropriate agri-environment use(s), there could be slight positive impact for landscape character if the embedded character supporting mitigation and planting enhancement measures are retained at the end of decommissioning phases for Lime Down Areas A to E, as a positive landscape legacy of the project.

Neutral impacts

Visual Impacts

It is not currently clear from the information submitted, whether the existing baseline condition of low maintained hedgerow structure which characteristically supports more open views over the rolling limestone fields and field patterns structure, and which are proposed to be managed at greater height alongside new planting in order to provide visual mitigation for the development, would be restored back to baseline conditions at decommissioning stage. If existing and new hedgerow structure is reduced in height back to baseline height conditions, then this would represent a neutral effect. If the mitigating hedgerow structure located within and bordering Lime Down Areas A to E is retained in a higher managed state following the decommissioning phase, then the loss of open views and the appreciation of rolling limestone fields viewed over lower maintained hedgerows would not be a neutral effect.

Landscape Impacts

Landscape Fabric:

Following decommissioning, the removal of the discordant industrialising energy components from Lime Down Areas A to E, including maintenance tracks, restoration of site access points back to conventional agricultural field access gateways, removal of 'highway improvement works' from rural lanes, restoration of the land back to farmland and restoring the perceptual rural qualities of the countryside back to baseline conditions, would represent a neutral impact in terms of land use and perceptual qualities of rural countryside.

Following decommissioning, the removal of the additional and linking 'Permissive' Public Rights of Way and the corresponding loss of additionally created recreational PRoW access to countryside would be a neutral effect by returning the PRoW network back to its original baseline status prior to the project taking place.

Negative impacts – construction phase

Visual Impacts

Removal of hedgerow sections to create access points with associated highway visibility splays, soil stripping, plant movement, construction of access tracks, 'highway improvements' to facilitate AIL and HGV traffic, and construction and operation of compound areas will all create short-term (2 years) but high-intensity noise and visual disruption across multiple site areas (Lime Down areas A to E and along the entire length of the CRC). This will impact upon the amenity and views experienced by local residents and rural communities using Public Rights of Way and the local road network. This will be compounded by programmed multi-site working at the same time, extending the visual and audible impact over a large, disaggregated area impacting multiple receptors.

Noise and visual disturbance including artificial light, impacting the relative rural tranquillity adjoining the setting to the eastern and southern edges of the Cotswold National Landscape (CNL), and for users of the Public Rights of Way and rural road network approaching and exiting the CNL within its setting including visitors and tourists.

Cable corridors, new access points and access tracks risk severing hedgerow networks and introducing linear scars during construction, fragmenting visual connectivity and visual amenity.

Landscape Impacts

Landscape fabric:

The removal of existing hedgerow sections and trees to create numerous new and substantially widened field/site access points with associated highway visibility splays, alongside the introduction of very large-scale solar arrays and maintenance tracks, associated battery storage systems and substations, will introduce new discordant engineered patterns and industrialising features at scale into a landscape currently defined by highly rural, open, gently undulating limestone farmland. This landscape currently provides the rural setting for villages, hamlets and outlying rural farmsteads/country houses with a strong Cotswold stone vernacular.

The development will also change the perceptual aspects of the landscape at a site and local level close to and separating rural settlements. The introduction of security fencing, substations, and battery storage compounds will create a large-scale utilitarian aesthetic at odds with the traditional limestone vernacular. Dense panel layouts, fencing and high hedgerows will obscure historic enclosure patterns currently expressed by low hedgerows and dry-stone walls.

Negative impacts – operational

Visual Impact

For PRoW that pass through solar panel field areas (Lime Down Areas A to E), the negative visual effects experienced by users will not diminish during the operational life of development. Users of these PRoW will experience an obvious and notable change in views, including Combined and Sequential Cumulative Visual Impacts for the individual site areas A to E and the CRC, as well as with similar projects within the study area. The change is from the existing visual baseline situations for Lime Down areas A to E, with open rural views across agricultural fields to that of views of and between renewable energy infrastructure components. The existing perceptual

experience and value of countryside for these PRoW users will fundamentally change, impacting the visual amenity value for users along these impacted routes.

The visual effects, including Cumulative Visual Impacts, arising from the development, that users of local roads and PRoW that run adjacent or in close proximity to Lime Down areas A to E, are likely to experience the new development during initial early years of the operational phase (estimate 0-7 years), where the existing structure (hedgerows, trees, woodland) of the landscape does not provide effective visual screening to development areas, will be most notable during winter months without benefit of screening leaf cover, or where numerous new or widened field access gateway openings will provide new or increased views to development areas. The existing perceptual experience and value of countryside for these PRoW users may also fundamentally change, impacting quality of amenity experienced for users along impacted routes.

Direct visual impacts of the development, including Cumulative Visual Impacts, will be sustained during the early years of the operational life of development (estimated to be minimum 5-7 years and subject to successful establishment and ongoing management of new planting for this purpose) until the proposed visual screening provides its intended mitigating function by allowing existing hedgerows to grow, and new screen planting to mature. This proposed visual screening will reduce the sense of openness and views currently experienced over the existing maintained low hedgerow structure.

Landscape Impact

Landscape fabric:

The very large-scale land use change combined with the discordant industrialising nature of new introduced development elements will significantly and adversely impact upon the receiving landscape fabric baseline condition at a site and local level. In this regard the LPA raises significant concern in relation to the currently under-assessed effects for 'landscape fabric' including for cumulative assessment of landscape fabric, as included within the submitted Landscape Assessment at 6.1 Environmental Statement Volume 1, Chapter 8 Landscape and Visual [APP-060], and supporting tables and figures.

The removal of existing hedgerow sections and trees to create numerous new and substantially widened (up to 16m wide) existing field access entrance gateways from the public highways and byways with associated necessary highway visibility splays, will in places likely require substantive hedgerow removals. Additionally, the introduction of very large-scale solar arrays and maintenance tracks, associated battery storage systems and substations will introduce new discordant engineered patterns and industrialising features into a landscape which is currently defined by highly rural, open, gently undulating limestone farmland, which provides the landscape setting for, and rural countryside separation between: rural villages, hamlets and isolated farmsteads with a strong Cotswold stone vernacular.

The development will change the perceptual aspects of the landscape fabric at a site and local level, close to and separating rural settlements. The introduction of solar PV arrays, substations, battery storage compounds and security fencing, will create a large-scale utilitarian aesthetic, at odds with the traditional and historic limestone vernacular. Dense panel layouts, utilitarian structures, fencing and higher-level hedgerow management will obscure historic field enclosure patterns currently expressed by lower maintained hedgerows and dry-stone walls. These adverse landscape fabric impacts will remain for the operational life of development.

Landscape Character:

The very large-scale land use change combined with the discordant industrialising nature of development proposed will significantly and adversely impact upon the receiving landscape

character baseline condition at a site and local level. In this regard the LPA raises significant concern in relation to the currently assessed effects for 'landscape character' including for cumulative assessment of landscape character, included within the submitted Landscape Assessment at 6.1 Environmental Statement Volume 1, Chapter 8 Landscape and Visual [APP-060], and supporting tables and figures.

The LPA does not accept that the likely landscape impact assessed to arise from development of this scale and nature has been appropriately assessed in this regard. Further detailed technical justification and the reasons for this are explained within the council's Relevant Representation response [RR-4934], under 'Landscape and Visual Considerations Section' comments.

The baseline landscape character will be changed from agricultural farmland located within an existing highly rural and relatively tranquil and sensitive part of the 'Limestone Lowland' landscape character type to the east and south of the CNL boundary, which currently functions as important separating rural countryside surrounding and separating distinctive limestone village, hamlet and farmstead settlement patterns and which also currently provides accessible countryside for associated rural communities. The baseline character will be changed to a new highly uncharacteristic scale of utilitarian industrialising energy land use, impacting upon important existing perceptual rural characteristics and functions of the landscape, including for the wider landscape setting of the CNL designation and for users of the Fosse Way.

Operational / Maintenance -Replacement

The necessary replacement of 100s of BESS battery units (likely 2-3 times) and more than a million solar PV panels (likely 1-2 times) during the operational lifespan of the project will result in intense periods of maintenance/replacement and transport of individual component parts which is likely to result in increased noise and disruption and visual disturbance, impacting local residents and rural communities, rural road and PRow users.

Adverse landscape character impacts will remain for the operational life of development.

Negative impacts – decommissioning phase

Visual Impacts

The dismantling of substations and fenced compounds, solar PV array systems, and BESS facilities, construction plant movement, excavation and removal of highway access points, internal maintenance tracks, soil replacement / restoration operations, alongside AIL and HGV traffic movements to dispose of scheme components including substation components, over a million solar PV panels, and likely thousands of tonnes of aggregates, will all combine to create short-term (estimated 2 years) of high-intensity noise and visual disruption across multiple sites (Lime Down areas A to E) which will impact upon local residents and rural communities, Public Rights of Way and local road network users. This will be compounded by programmed multi-site working at the same time, extending the visual impact over a large area for multiple visual receptors.

Noise and visual disturbance including artificial light, impacting the relative rural tranquillity adjoining the setting to the eastern edge of the CNL, for users of the Public Rights of Way and rural road network leading into the CNL and which provides visual separation between rural settlements and visual settings and accessible recreation functions around settlements.

The impact along the Cable Route Corridor(s) during decommissioning are likely to be much less than for Lime Down Areas A to E, as it is understood the applicant currently plans to leave the buried cable/s in-situ following decommissioning of energy generation and transfer. It is likely

that only operational maintenance access to the CRC would be required to be removed, the details of which are not designed or provided at this stage.

Landscape Impacts

Landscape fabric:

Within Lime Down Areas A to E, the removal of renewable energy generation and storage infrastructure is likely to result in some potential for negative impacts for certain fabric components, such as removal of pastoral grassland land cover back to arable use, and possibly some hedgerows and trees during construction and restoration activities associated with dismantling and removal of solar PV panel field areas, potential creation of construction (decommissioning) compounds, and additional or widened access points to facilitate removal of solar arrays, substations and BESS and the maintenance tracks.

Ranking the Landscape and Visual impacts in importance

All the local impacts identified are considered material to the ExA, but in accordance with the national guidance¹¹ the council would indicate the following as the most significant in relation to this theme:

- 1) The significant negative impacts on the elements and components, which combine to form the intrinsic and unique character of the receiving 'Limestone Lowland' landscape, through construction, operation and decommissioning across the project area and which are unable to be mitigated.
- 2) In terms of the setting of the Cotswolds National Landscape (CNL), the Landscape and Visual Impact Assessment (LVIA) hasn't given due regard to the locational sensitivity of Lime Down Areas A to C for development of this very large scale project and the contrasting nature to its receiving landscape baseline context which provides the setting to the CNL, including important PRoW and road links to and from the CNL and that experienced along the Fosse Way. The proposals therefore result in a significant negative impact on the landscape setting of the CNL.
- 3) The significant negative impacts on visual receptors across the project area, whether they be residential or people passing through or using the landscape for business or recreation, and which in many cases cannot be adequately or appropriately mitigated.
- 4) The value, susceptibility and sensitivity of the CNL's setting haven't been fully considered in respect of the landscape or visual impacts arising from construction traffic and works to rural road network to facilitate construction, maintenance replacement of infrastructure components or decommissioning phases. These are significant negative impacts upon rural character and relative tranquillity in areas considered to be complementary to the character of the CNL. There will be significant negative impacts on the rural character and relative tranquillity of the setting of the CNL because of traffic and works to facilitate construction, maintenance replacement during operation, and decommissioning.
- 5) There will be significant negative impacts upon the important existing role and function of the landscape which surrounds and separates the highly distinctive and deeply rural limestone village, hamlet and farmstead settlement pattern, and which also provides accessible countryside recreation opportunities for associated rural communities across a large area. The loss and reduction of perceptual rural character and relative rural tranquillity

¹¹ National Guidance published in 2024, 'Nationally Significant Infrastructure Projects: Advice for Local Authorities'

of countryside arising from the very large-scale land use change in combination with the deeply contrasting utilitarian nature of development will harm landscape character and experiential recreational quality.

Requirements recommended to the Examining Authority to mitigate impact

Should the ExA be minded to recommend approval of this proposal to the SoS then Wiltshire Council would request that the following requirements (conditions) be considered to mitigate the impacts identified above. For the sake of clarity, a full schedule of suggested requirements (conditions) and reasons are included in Appendix B.

Landscape and Visual		Requirement to be discharged by:	
Requirement	Reason	Secretary of State	Wiltshire Council
<p>1. (Final) Landscape and Ecology Mitigation Plan/s</p> <p>(1) No part of the authorised development within Lime Down Areas A, B, C, D or E, or the Cable Route Corridor (CRC) or other areas included within the DCO limits may commence until a Final Landscape and Ecology Mitigation Plan/s has been submitted to and approved in writing by the LPA.</p> <p>(2) The approved Final Landscape and Ecology Mitigation Plan/s shall be submitted to and approved in writing by the LPA prior to any separate application seeking detailed landscape design approval/s for that same area.</p>	<p>The DCO application is submitted under ‘Rochdale Envelope’ principles and contains insufficient levels of detail, or a final development proposal upon which to base a clearly defined ‘Landscape and Ecology Mitigation Plan’. A Final Landscape and Ecology Mitigation Plan is necessary to spatially define the mitigating requirements and principles prescribed within the LVIA and the ecological assessments based on a final development proposal for planning certainty.</p>		Yes
<p>2. Detailed Landscape Design approval</p> <p>(1) No part of the authorised development within Lime Down Areas A, B, C, D or E, or the Cable Route Corridor (CRC) or other areas included within the DCO limits may commence until a Detailed Landscape Design for that area or phased sub-area or CRC or phased section of the CRC, or other DCO area has been</p>	<p>The DCO application is submitted under ‘Rochdale Envelope’ principles and contains insufficient outline levels of information and/or final development proposal. This matter is required to be agreed with the Local Planning Authority before development commences in order that the development is undertaken</p>		Yes

Landscape and Visual		Requirement to be discharged by:	
Requirement	Reason	Secretary of State	Wiltshire Council
<p>submitted to and approved in writing by the LPA.</p> <p>(2) The Detailed Landscape Design must be consistent with the design principles and parameters, the (Final) approved Landscape and Ecology Mitigation Plans and the (Final) approved LEMP.</p> <p>(3) The Detailed Landscape Design plans shall be prepared at a suitable scale and include:</p> <ul style="list-style-type: none"> • location and current canopy spread of all existing trees and hedgerows on the land; • clearly identify any trees or hedgerows/sections of hedgerow proposed for removal from the land; • full details of any trees and hedgerows to be retained, together with measures for their protection during the course of development; • detailed planting plans and specifications showing all plant species, seed mixes, planting locations, planting and seeding densities, supply provenance, plant stock sizes, and means of protection from livestock grazing and deer / rabbit browsing; • finished levels and contours including for earth bunds identified to be necessary for noise attenuation functions, pollution control, or long-term soil storage for land restoration purposes; • means of enclosure including, fences, gates and security measures; 	<p>in an acceptable manner, to ensure mitigation measures are appropriately designed and specified, that a satisfactory landscaped setting for the development is provided, and existing important landscape /ecological features are adequately protected during the course of development, and to provide a sufficiently detailed landscaping scheme for future monitoring and planning enforcement purposes.</p>		

Landscape and Visual		Requirement to be discharged by:	
Requirement	Reason	Secretary of State	Wiltshire Council
<ul style="list-style-type: none"> • maintenance tracks, service compounds and car park layouts; • other vehicle and pedestrian access and circulation areas, including required highway safety visibility splays; • all hard and soft surfacing materials; • minor artefacts and structures (e.g. signage, refuse and other storage units, signs, lighting, CCTV poles and cameras etc.); • proposed and existing functional services above and below ground (e.g. drainage, power, communications, cables, pipelines, indicating lines, manholes, supports etc.) alongside details of any relevant utility easements that restrict tree planting; • existing and proposed ponds, drainage ditches and other surface water drainage features; • retained historic landscape features (e.g. dry-stone walls, stone styles, etc.) and proposed protection or restoration, where relevant; • Location and heights of screening vegetation acting as visual mitigation identified in the LVIA; • PRow and access enhancements; and • Ecological compensation, mitigation and BNG proposals. <p>(4) The authorised development must be carried out in accordance with the approved Detailed Landscape Design for</p>			

Landscape and Visual		Requirement to be discharged by:	
Requirement	Reason	Secretary of State	Wiltshire Council
each part or phased sub-part of development.			
<p>3. Landscaping to be carried out and maintained</p> <p>(1) All soft landscaping comprised in the approved detailed landscape design shall be implemented in the first planting and seeding season following the commissioning of the development or relevant phase or sub-phase of development unless otherwise agreed in writing with the LPA.</p> <p>(2) All soft landscaping shall be maintained free from weeds and shall be protected from damage by vermin and stock and maintained for a minimum of five years' establishment from completion of each relevant phase or sub-phase. Any trees or plants which die, are removed/missing, or become seriously damaged or diseased shall be replaced in the next planting season with others of a similar size and species, unless otherwise agreed in writing by the LPA.</p> <p>(3) Long term management of the approved detailed landscaping scheme shall be carried out in accordance with the approved final LEMP for the life of development.</p>	To ensure the short-term establishment and long-term management of landscape and ecological features and habitats retained and created by the development, for the benefit of visual amenity and biodiversity for the lifetime of the scheme.		Yes
<p>4. (Final) Landscape and Ecological Management Plan (LEMP)</p> <p>(1) No part of the authorised development may commence until a Final LEMP for the whole</p>	The DCO application is submitted under 'Rochdale Envelope' principles and the outline LEMP is not based on a final development proposal. This		Yes

Landscape and Visual		Requirement to be discharged by:	
Requirement	Reason	Secretary of State	Wiltshire Council
<p>of the DCO order limits has been submitted to and approved in writing by the LPA. This shall include detailed landscape and ecological management recommendations and monitoring for each of the Lime Down Areas A, B, C, D, E and the CRC.</p> <p>(2) The final LEMP must be substantially in accordance with the Outline LEMP and include:</p> <ul style="list-style-type: none"> • objectives and management prescriptions for each habitat and feature during construction, operation and decommissioning. • success criteria, monitoring methods and frequencies, and triggers for remedial measures; [Monitoring must record survival rates, canopy cover, hedgerow structure, sward composition, habitat condition and any failures against the success criteria in the final LEMP]. • governance, competencies and responsibilities, including appointment of an Ecological Clerk of Works during construction; • budget and resourcing for the operational life of the development; • data management and reporting protocols; and • arrangements for co-ordination with any BNG Management and Monitoring Plan required as separate requirement(s). • objectives and management prescriptions to achieve embedded landscape enhancement and visual 	<p>matter is required to be agreed with the Local Planning Authority before development commences to ensure landscape and ecological features retained and created by the development, are appropriately established, and maintained to deliver the embedded mitigation and enhancement measures for visual amenity and biodiversity for the operational lifetime of the development.</p>		

Landscape and Visual		Requirement to be discharged by:	
Requirement	Reason	Secretary of State	Wiltshire Council
<p>screening measures identified within the LVIA for landscape and visual mitigation purposes.</p> <ul style="list-style-type: none"> appropriately scaled supporting plans to illustrate the spatial arrangement and location of each habitat or feature to be managed with clear cross reference to final LEMP management objectives and prescriptions. <p>(3) The undertaker must undertake landscape and habitat condition monitoring in years 1, 2, 3, 5 and 10, and at five-year intervals thereafter for the duration of the authorised development. Where monitoring indicates success criteria are not met, adaptive management measures must be implemented within six months, with any remedial actions agreed with the LPA.</p> <p>(4) A Landscape Monitoring Report must be submitted to the LPA within three months of each monitoring year.</p> <p>(5) The authorised development must be carried out and maintained in accordance with the approved Final LEMP and shall be implemented in full and for the lifetime of the development in accordance with the approved details or any necessary subsequent adaptive management measures agreed in writing with the LPA.</p>			
<p>5. (Final) Soil Resource and Management Plan</p>	<p>The necessary level of required detail is not provided within 7.15 Outline Soil Resources</p>		<p>Yes</p>

Landscape and Visual		Requirement to be discharged by:	
Requirement	Reason	Secretary of State	Wiltshire Council
<p>1) No part of the authorised development may commence until a final Soil Resource and Management Plan (SRMP) has been submitted to and approved in writing by the LPA. The Final SRMP must be substantially in accordance with the Outline SRMP.</p> <p>2) The plan must set out methodologies for soil stripping, soil handling - including compaction avoidance, separation of topsoil from subsoil, soil storage details (including maximum storage heights and locations for temporary and long-term storage for future land restoration at decommissioning stage).</p> <p>3) The authorised development must be carried out in accordance with the final approved Soil Resource and Management Plan.</p>	<p>Management Plan [APP-280].</p> <p>The final detailed SRMP is required to safeguard and sustainably manage all on-site soil resources in accordance with recognised current best practice, to ensure soil health and condition is maintained or improved during the development phases and demonstrate that the reinstatement of land back to baseline agricultural values or agreed agri-environment uses following decommissioning is achievable.</p>		
<p>6. Arboricultural method statement(s) and tree protection</p> <p>These are highlighted to be necessary, but it is understood the Council's tree officer(s) have already provided the technical requirements and reasons for these.</p>			Yes
<p>7. Glint and glare assessment and mitigation</p> <p>(1) No part of the authorised development may commence until a Glint and Glare Assessment, and any associated mitigation plan have been</p>	<p>The application does not provide a final detailed scheme layout. This condition is necessary to ensure that no unacceptably harmful glint and glare effects will arise from the final design and</p>		Yes

Landscape and Visual		Requirement to be discharged by:	
Requirement	Reason	Secretary of State	Wiltshire Council
<p>submitted to and approved in writing by the LPA.</p> <p>(2) The assessment and mitigation must consider residential receptors, highways, PRow and aviation receptors and address panel finishes, layout/orientation, finished levels and effectiveness of vegetative screening.</p> <p>(3) The authorised development must be carried out in accordance with the approved mitigation plan.</p>	<p>layout of solar PV panel arrays and areas, or where adverse effects are identified for specific visual receptors that impacts can be acceptably mitigated.</p>		
<p>8. (Final) Public Rights of Way and Access Enhancement Plan</p> <p>(1) No part of the authorised development may commence until a final PRow and Access Enhancement Plan has been submitted to and approved in writing by the LPA.</p> <p>(2) The plan must identify diversions, improvements, surfacing, gates, viewpoints and interpretation, and demonstrate how opportunities to enhance PRow and public access have been maximised through design and layout.</p> <p>(3) The PRow and Access Enhancement Plan must be implemented before operation of the first arrays in the relevant part, unless otherwise agreed in writing by the LPA.</p>	<p>To ensure that Public Rights of Way are appropriately managed during all stages of development and that opportunities to enhance public access are identified and implemented to help achieve objectives of sustainable development.</p>		Yes
<p>9. Community access, interpretation and PRow condition</p>	<p>To ensure that Public Rights of Way are appropriately managed during all stages of development and that</p>		Yes

Landscape and Visual		Requirement to be discharged by:	
Requirement	Reason	Secretary of State	Wiltshire Council
<p>(1) Prior to operation of the first arrays, the undertaker must install interpretation boards, viewpoints and wayfinding in locations identified in the PRow and Access Enhancement Plan and maintain them in good repair for the duration of the authorised development.</p> <p>(2) Annual PRow condition checks must be included within the Landscape Monitoring Report.</p>	<p>opportunities to enhance public access are identified and implemented to help achieve objectives of sustainable development.</p>		
<p>10. Construction Environmental Management Plan (CEMP): Landscape and Ecology</p> <p>(1) No part of the authorised development may commence until a CEMP: Landscape and Ecology has been submitted to and approved in writing by the LPA.</p> <p>(2) The CEMP: Landscape and Ecology must include:</p> <ul style="list-style-type: none"> a) roles and responsibilities, including Ecological Clerk of Works (ECoW) oversight and toolbox talks; b) protective fencing and buffer zones for retained habitats and trees; c) invasive non-native species control measures; d) dust, noise and lighting controls; e) soil and water management; and f) temporary landscape works and early planting measures to achieve screening. <p>(3) The authorised development must be carried out in</p>	<p>To ensure important landscape features and ecological habitats are appropriately protected from construction activities and temporary works during development.</p>		<p>Yes</p>

Landscape and Visual		Requirement to be discharged by:	
Requirement	Reason	Secretary of State	Wiltshire Council
accordance with the approved CEMP: Landscape and Ecology.			
<p>11. Landscape Phasing and early establishment</p> <p>(1) No part of the authorised development may commence until a Landscape Phasing Plan has been submitted to and approved in writing by the LPA.</p> <p>(2) The Phasing Plan must provide for advance planting and habitat creation to be undertaken at the earliest practicable stage for priority receptor groups identified in the LVIA and coordinate with grid connection works.</p> <p>(3) Planting and habitat creation in each phase must be implemented in the first planting season following completion of construction works in that phase.</p>	To ensure timely and co-ordinated delivery of embedded landscape and visual, and ecological mitigation proposals at the earliest opportunity.		Yes
<p>12. Design change control</p> <p>(1) The authorised development must be carried out in accordance with the design principles and parameters; any material departure requires approval of the relevant planning authority accompanied by an addendum assessing any change in landscape and visual effects.</p> <p>(2) A Design Commitments Register must be maintained for examination and post consent governance and made available to the relevant planning authority on request.</p>	The DCO application is submitted under 'Rochdale Envelope' principles and is subject to change, during the course and lead up to examination. The assessment of landscape and visual effects should be based on up to date and worse case development scenarios to inform planning judgements, and future governance and enforcement actions.		Yes

Landscape and Visual		Requirement to be discharged by:	
Requirement	Reason	Secretary of State	Wiltshire Council
13. Lighting			
(1) Prior to operation of any part of the authorised development, a Lighting Strategy must be submitted to and approved in writing by the LPA.	To mitigate as far as practicable against all unnecessary effects of artificial light pollution associated with the development, to protect important dark corridors for wildlife, and to safeguard the dark skies 'special quality' of the Cotswold National Landscape.		Yes
(2) The Lighting Strategy must minimise artificial light spill and avoid upward light spill, use downward directed, motion activated luminaires where practicable, to protect integrity of existing dark corridors for wildlife, and to conserve the intrinsic dark skies special quality of the Cotswold National Landscape.			
(3) The authorised development must be operated in accordance with the approved Lighting Strategy.			
14. BNG delivery and monitoring (NSIP regime)			
(1) Where the statutory BNG regime for NSIPs is in force, the undertaker must achieve and maintain the biodiversity gain objective across the order limits or via registered off-site biodiversity units or statutory credits, calculated with the applicable statutory biodiversity metric.	To ensure the development contributes towards nature recovery targets and delivers sustainable development.		Yes
(2) Habitats created for the purpose of achieving BNG must be managed for the duration of development.			
(3) A BNG Management and Monitoring Plan must be submitted to and approved prior			

Landscape and Visual		Requirement to be discharged by:	
Requirement	Reason	Secretary of State	Wiltshire Council
<p>to operation of the authorised development and must include annual reporting to the relevant planning authority and, where applicable, updates to any national register.</p> <p>(4) Where irreplaceable habitat is affected, bespoke compensation must be delivered in accordance with the applicable policy framework.</p>			
<p>15. Vegetation management beneath arrays</p> <p>(1) Prior to operation of any part of the authorised development, a Vegetation Management Plan for that part must be submitted to and approved in writing by the LPA.</p> <p>(2) The plan must set out mowing/topping regimes, compatible sheep grazing prescriptions (including stocking densities and exclusion periods), and no spray buffer zones adjacent to hedgerows and watercourses.</p> <p>(3) The authorised development must be operated in accordance with the approved Vegetation Management Plan.</p>	<p>It is not clear from the information submitted to date how the grassland/vegetation (both existing and proposed) located beneath solar panel areas will be managed, to achieve the landscape and ecological benefits stated.</p>		Yes
<p>16. Invasive non-native species</p> <p>(1) The undertaker must prepare and implement an Invasive Non-Native Species Management Plan for the order limits covering construction and operation, including surveillance, treatment and biosecurity measures.</p>	<p>To safeguard the integrity of existing native habitats and species present across the large site areas.</p>		Yes

Landscape and Visual		Requirement to be discharged by:	
Requirement	Reason	Secretary of State	Wiltshire Council
(2) The plan must be submitted to and approved in writing by the LPA before commencement.			
<p>17. Decommissioning and restoration</p> <p>(1) Not less than 12 months before cessation of renewable energy generation within any part of the authorised development, the undertaker must submit a Decommissioning and Restoration Plan (DRP) for that part to the LPA for approval in writing.</p> <p>(2) The DRP should include details of planned sequenced phased removal of all renewable energy infrastructure components from the land, and phased restoration of all DCO farmland back to baseline condition(s).</p> <p>(3) The DRP must provide for:</p> <ul style="list-style-type: none"> • removal of panels, BESS, all structures, fencing, maintenance tracks and hardstanding's and underground infrastructure where it can be achieved without undue environmental harm. • soil reinstatement and restoration to agricultural use compatible with baseline land capability or retention/transition of successful habitats where agreed; measures to prevent introduction or spreading of any non-native species during all decommissioning and restoration activities. • restoration and re-planting of hedgerows where these were 	<p>To ensure that following the cessation of temporary long-term renewable energy use, all development will be removed from the land and the land restored back to productive farming, or other agreed agri-environment use(s), necessary for planning certainty.</p>		Yes

Landscape and Visual		Requirement to be discharged by:	
Requirement	Reason	Secretary of State	Wiltshire Council
<p>removed to facilitate either construction access or operational maintenance accesses, or additionally required for removal.</p> <ul style="list-style-type: none"> to facilitate the removal of energy infrastructure and maintenance tracks as part of decommissioning works. removal of highway improvement areas/HGV passing places, and restoration back to rural highway verges, unless otherwise agreed in writing with the LPA. retention of PRow enhancements where agreed; and details of post restoration monitoring arrangements for a period of five years. <p>(4) Decommissioning must be completed within 24 months of cessation of energy generation, storage or transfer, unless otherwise agreed in writing by the LPA.</p>			

Section 106 Requirements

Landscape and Visual	Reason (including justification for why a condition is not adequate)
None identified.	



Section 9: Built Heritage

Overview and commentary

The most significant impact of the Lime Down Solar Park proposal is identified as being on the Grade I listed Bradfield Manor Farmhouse, where the erosion of its rural setting, particularly designed views from the 17th-century parlour wing, is unlikely to be fully mitigated until landscaping matures. The council’s Built Heritage and Conservation Officer considers this harm to be less than substantial but at a medium level due to the asset’s exceptional significance. Additional concerns include harm to Rodbourne Conservation Area from highway improvement works, which were not addressed in the applicant’s assessment; mitigation could be achieved through careful design or reinstatement.

Other impacts on designated and non-designated heritage assets, such as farmhouses, barns, and outfarms, are assessed as less than substantial harm (lower end), primarily through the erosion of wider agricultural settings. These effects are expected to diminish over time as landscape mitigation matures and will be reversible upon decommissioning. The officer does not object outright but recommends requirements to secure robust mitigation measures, including detailed design approval for access works and landscape enhancements.

Summary of main impacts

Built Heritage
(1) Summary of main impacts
Positive impacts – construction phase
None identified.
Positive impacts – operational
No specific benefits identified but, generally, there may be potential minor benefits from some areas of the proposed ‘embedded’ landscape mitigation where this is implemented within the wider setting of some of the historic farmsteads and comprises the reinstatement of field boundaries on historic alignments and/or appropriate and in character ‘repair’ to existing degraded historic hedgerows and woodlands.
Positive impacts – decommissioning phase
No specific benefits identified but potential minor benefit from embedded mitigation as above, assuming this is retained at decommissioning stage.
Neutral impacts
Largely as summarised within the submitted Impact Assessment tables in 6.3 Environmental Statement Volume 3, Appendix 12-8 Cultural Heritage Impact Assessment Tables [APP-232] and the more detailed significance and impact assessment contained within the 6.3 Environmental Statement Volume 3, Appendix 12-1 Heritage Statement [APP-219]. These conclude that, with the embedded mitigation, there will be a neutral or no impact on the heritage significance of the majority of heritage assets within the Study Area.
Differences in opinion are noted below under ‘Negative Impacts’ sections.
Negative impacts – construction phase
The types of impacts would generally include harm to the significance of heritage assets due to change within their settings, such that the contribution made by setting to significance is reduced, resulting from noise, vibration, dust etc. and loss of tranquility or visual impact from site construction, cable route construction, temporary compounds and lay-down areas. In addition,

there is the slight possibility of direct adverse effects to heritage assets due to swipes and strikes or through vibration as a result of HGV movement and construction traffic.

These impacts are largely as summarised within the submitted Impact Assessment tables in 6.3 Environmental Statement Volume 3, Appendix 12-8 Cultural Heritage Impact Assessment Tables [APP-232] and the more detailed significance and impact assessment contained within the 6.3 Environmental Statement Volume 3, Appendix 12-1 Heritage Statement [APP-219]. Setting impacts are largely as noted below for the Operational Phase with the additional impact which can be ascribed specifically to the construction phase likely to be temporary and short-lived during construction at each site and for the cable route. These impacts should be mitigated by good working practices and provisions for making good accidental damage which should be secured through the 7.12 Outline Construction Environmental Management Plan [APP-277], 7.13 Outline Operational Environmental Management Plan [APP-278], and 7.14 Outline Decommissioning Strategy [APP-279].

Specific assets (in addition to those where there will also be impact during the 'Operational Phase', which are noted below) identified where there may be potential short-lived impacts related to the construction of the cable corridor, include Grittleton, Rodbourne and Easton Conservation Areas, Whitley House, Easton House and Westlands Farmhouse. These impacts are expected to be short-lived and temporary resulting in a largely neutral impact on heritage significance subject to appropriate management.

In addition, it is considered that there will be a negative impact which has not been identified to the following asset:

There is potential for impact on the setting of the **Grade II* listed Grittleton House** which may affect its significance to a greater extent, from the construction compound and cabling route to the east of the house. As the house is in use as a hotel which makes use of the designed landscape surrounding the building, including the east lawns, there is also potential for impact on the viability of the business which may have an impact on the building's future. Appropriate mitigation in the form of construction timing and remediation would be required to limit these impacts.

Rodbourne Conservation Area is a small agricultural village set within a wider agrarian landscape. The track leading into Site E from the south-west corner of the conservation area, close to Trinity Farm, is due for upgrading as a highway improvement area to facilitate the construction and the works to the currently rural trackway and engineering of the junction with the highway which runs into Rodbourne are likely to be at odds with the rural character of the village, resulting in a level of harm.

Mitigation could include careful design of the highway improvement works to maintain the rural character of the track and junction and/or commitment to reinstatement following construction.

In summary, the additional (above that of the installation itself) harm to the significance of heritage assets from the construction phase should be limited and largely neutral provided that appropriate and robust management provisions are secured via the CEMP and LEMP.

Negative impacts – operational

Negative impacts will include the residual visual impact of the panels in situ once construction is completed. Harm to the significance of heritage assets would occur where change within their settings reduces the contribution that the setting makes to the significance of the asset. This most often occurs in the case of a solar installation via the ‘urbanisation’ of the rural landscape within which an asset is set, leading to a general erosion of the ability to understand the asset in its context. Harm will be reduced over a period as the landscaping proposed as mitigation matures and the impacts are largely limited reversible following decommissioning of the installations, resulting in a neutral impact on the significance in the case of most heritage assets within the study area. However, where the site makes a more specific contribution to the significance of the asset – usually through being in the immediate setting within which the asset is experienced or where there is a functional or historic association between the site and the asset (often in these cases between a farmstead and its agricultural holding or a country house and designed landscape), the harm may be greater even though of limited (generation) duration.

It is agreed that the impacts are largely adequately set out within the submitted Impact Assessment tables in 6.3 Environmental Statement Volume 3, Appendix 12-8 Cultural Heritage Impact Assessment Tables [APP-232] and the more detailed significance and impact assessment contained within the 6.3 Environmental Statement Volume 3, Appendix 12-1 Heritage Statement [APP-219].

Locations where a low-level of harm to significance is noted in a number of cases by the Applicant include:

Designated Heritage Assets

Bradfield Manor Farmhouse (Grade I), Hullavington

Significance: The core of the property comprises a medieval hall house with 15th-century origins, later extended in the 17th and 19th centuries and including a 17th-century parlour block designed to take advantage of views over the surrounding estate. The property has high architectural and historic interest as one of the most important rural manor houses in Wiltshire. The proposed solar farm would be sited on land formerly within the manor’s ownership and whilst some southern views have already been interrupted by later development, the open rural landscape to the north remains visually and physically connected to the building and forms part of its historic setting.

Mitigation: Removal of panels from nearest fields, creation of woodland belts and wildflower meadow, and enhancement of hedgerows.

Impact: The impact will be via the erosion of the building’s rural setting by the appearance of the solar panels BESS and substation to the north. Enhanced hedgerows and a woodland belt are proposed to mitigate the impact of the panels, BESS and substation, but sections suggest that, while the hedgerows may screen views of the panels from ground level, from the upper floors of the parlour block the substation and BESS and potentially also the panels will remain visible and will only be filtered in views as the woodland belt reaches maturity. There will also be some temporary harm from compound and cable works, including noise and plant movement. The Applicant’s Heritage Team conclude that *less than substantial harm* (lower end) will result.

Whilst the council’s Built Heritage and Conservation Officer agrees that the harm will be less than substantial given that there will be no direct harm to the asset and its immediate setting will be unchanged, it is considered that the level of harm during the operational phases should probably

be considered to be at a medium level taking into account the high significance of the asset, the designed nature of the views affected and the likelihood that the proposed woodland belt mitigation will take some time to mature and provide effective screening.

Surrendell Farmhouse (Grade II), Grittleton -

Significance: A 17th-century farmhouse retaining original features such as mullioned windows and inglenook fireplace, representing historic rural settlement. Areas of Site C were historically part of the agricultural landholding of the farmstead. This is no longer the case but the site still contributes to the wider agricultural setting of the farmhouse in a positive way.

Mitigation: Removal of panels from nearby fields, hedgerow enhancement, and new scrub planting.

Impact: Despite the removal of panels from the closest fields there may still be some limited intervisibility which leads to erosion of the wider agricultural setting of the farmstead. Temporary harm anticipated due to cable works and compound activities, including movement of plant and construction noise. Harm from the installation will be mitigated further once the proposed landscape measures are mature and the residual impact will be limited and cause less than substantial harm (lower end).

Barn to the East of Surrendell Farmhouse (Grade II)

Significance: A 17th-century barn forming part of the historic farmstead, valued for its group association with the farmhouse.

Mitigation: Removal of panels from nearby fields, hedgerow enhancement, and new scrub planting.

Impact: Despite the removal of panels from the closest fields there may still be some limited intervisibility which leads to erosion of the wider agricultural setting of the farmstead. Temporary harm anticipated due to cable works and compound activities, including movement of plant and construction noise. Harm from the installation will be mitigated further once the proposed landscape measures are mature and the residual impact will be limited and cause less than substantial harm (lower end).

Shelter Barn to the South East of Surrendell Farmhouse (Grade II)

Significance: A 17th-century agricultural building, listed for its group value with Surrendell Farmhouse.

Mitigation: Removal of panels from nearby fields, hedgerow enhancement, and new scrub planting.

Impact: Despite the removal of panels from the closest fields there may still be some limited intervisibility which leads to erosion of the wider agricultural setting of the farmstead. Temporary harm anticipated due to cable works and compound activities, including movement of plant and construction noise. Harm from the installation will be mitigated further once the proposed landscape measures are mature and the residual impact will be limited and cause less than substantial harm (lower end).

Fosse Lodge (Grade II), Grittleton

Significance: A picturesque 19th-century lodge built for the Grittleton Estate, notable for its octagonal tower and architectural detailing. The lodge was occupied and used in connection with the hunt and may have been specifically designed for this purpose, with the tower providing long

views across the countryside (including Site C) of the hunt in progress. There is therefore a specific visual relationship between the land within the site and this asset which contributes to its significance.

Mitigation: Panels have been removed from several fields and there are offsets along Fosse Way. In addition, hedgerow enhancement and creation of a native woodland block are proposed.

Impact: Panels have been removed from the closest fields and those remaining will be in distant views such that any harm from erosion of the rural setting will be *less than substantial harm* (lower end). There is also potential impact from construction noise and plant movement as a temporary construction compound is close by. Once the proposed mitigation has matured, the impact should be further reduced to a low level of residual harm.

Widley's Farmhouse (Grade II), Sherston

Significance: A 18th-century farmhouse with later additions, contributing to the historic character of the rural landscape. The farmhouse faces east towards Site A which shares a visual and spatial relationship with the farmhouse and forms part of the wider agricultural setting which contributes to the experience of the farmhouse and its significance in a positive way.

Mitigation: Hedgerow enhancement.

Impact: The panels are at some distance but, despite the enhancement of intervening hedgerows, there may still be some limited intervisibility which leads to erosion of the wider agricultural setting of the farmstead. The conclusion is that the solar installation will cause *less than substantial harm* (lower end).

New Barn at Widley's Farmhouse (Grade II), Sherston

Significance: A late 18th-century barn associated with Widley's Farm, contributing to the historic farmstead character.

Mitigation: Hedgerow enhancement.

Impact: The panels are at some distance but, despite the enhancement of intervening hedgerows, there may still be some limited intervisibility which leads to erosion of the wider agricultural setting of the farmstead. The conclusion is that the solar installation will cause *less than substantial harm* (lower end).

Non-Designated Heritage Assets

Outfarm, East of Lords Wood Cottage, Commonwood Lane, Sherston

Significance: A 19th-century outfarm representing historic agricultural practices in the rural hinterland. The building lies within the cable route and close to panels in Sites A and C.

Mitigation: Hedgerow enhancement.

Impact: The Applicant's team have identified *less than substantial harm* (lower end), including temporary harm from cable installation and associated plant movement given that the buildings lies within the cable route itself. However, the asset is non-designated and of lower significance. It will also remain in situ with the impacts being reversible once decommissioning is reached and the council's Built Heritage and Conservation Officer agrees with the assessment that there will be only *less than substantial harm* (lower end).

Lords Wood Cottage, Commonwood Lane, Sherston

Significance: A well-preserved example of a former farmhouse dating to the 19th-Century with associative value to surrounding farmland.

Mitigation: Hedgerow enhancement.

Impact: The Applicant's team have identified *less than substantial harm* (lower end), including temporary harm from cable installation and associated plant movement. However, the asset is already screened from much of the site via the existing mature Lords Wood. It is also non-designated and of lower significance. The council's Built Heritage and Conservation Officer agrees with the assessment that there will be only be *less than substantial harm* (lower end).

Outfarm, East-northeast of Widley's Farm, Sherston

Significance: A 19th-century farm building contributing to the historic agricultural landscape.

Mitigation: Screening and offsets to maintain agrarian setting.

Impact: The building will be surrounded by the proposed solar panels in Site A which will result in the loss of the ability to experience this asset as an agricultural building within its wider agricultural landscape. However, the asset is non-designated and of lower significance. It will also remain in situ with the impacts being reversible once decommissioning is reached and the council's Built Heritage and Conservation Officer agrees with the assessment that there will be only be *less than substantial harm* (lower end).

Outfarm, North-northwest of Avil's Farm

Significance: A small historic outfarm linked to Avil's Farm, illustrating dispersed farmstead patterns.

Mitigation: Screening and offsets to maintain agrarian setting.

Impact: The building will be surrounded by the proposed solar panels in Site E which will result in the loss of the ability to experience this asset as an agricultural building within its wider agricultural landscape. However, the asset is non-designated and of lower significance. It will also remain in situ with the impacts being reversible once decommissioning is reached and the council's Built Heritage and Conservation Officer agrees with the assessment that there will be only be *less than substantial harm* (lower end).

Townleaze Barn, Norton, Malmesbury

Significance: A 19th-century barn, altered but retaining some historic character as part of a former outfarm. The surrounding farm is now modern.

Mitigation: Hedgerow enhancement and woodland planting near the proposed substation.

Impact: The Applicant's team have identified *less than substantial harm* (lower end), including temporary harm from cable installation and associated plant movement. However, in the council's Built Heritage and Conservation Officer's view, taking into account the location of the asset within the farmstead and the nature of the asset as an ancillary part of a wider group, it is considered that there will be a largely neutral impact on this asset.

In addition, it is considered that there will be a negative impact which has not been identified to the following asset:

Rodbourne Conservation Area is a small agricultural village set within a wider agrarian landscape. The verdant, tree-lined character of the village itself, and the survival of a number of farmsteads within the village itself, contribute to its appreciation as a rural and agricultural-based village. The presence of the Bristol and South Wales Direct railway to the south of the village impacts adversely on the village via the noise impact. Rodbourne Conservation Area has a historic connection to the land within Lime Down E, with a number of these fields were worked by various properties within the village of Rodbourne.

The impacts of the solar installation and a substation have been mitigated by the removal of panels from the closest fields, the enhancement of hedgerows and establishment of a new native woodland block and these measures are largely successful such that the actual installation will have a neutral impact. However, the track leading into the site from the south-west corner of the Conservation Area, close to Trinity Farm, is due for upgrading as a highway improvement area and the works to the currently rural trackway and engineering of the junction with the highway which runs into Rodbourne are likely to be at odds with the rural character of the village, resulting in a level of harm.

Mitigation could include careful design of the highway improvement works to maintain the rural character of the track and junction and/or commitment to reinstatement following construction.

Negative impacts – decommissioning phase

There are limited specific details for decommissioning as methodologies may be subject to change within the intervening period. However, it is assumed that the impacts will largely mirror those identified for the construction phase and will be largely temporary and short lived in so far as additional harm over and above that of the installation is concerned. In this case, any impacts specifically relating to the decommissioning should be short lived and reversible and mitigated via good management.

Ranking the Built Heritage impacts in importance

All the local impacts identified are considered material to the ExA, but in accordance with the national guidance¹² the council would indicate the following as the most significant in relation to this theme:

The most significant impact is likely to be that on the Grade I listed Bradfield Manor via the erosion of its rural setting, taking into account the status of the building and the fact that the 17th- Century parlour wing appears to have been designed to enjoy views across the landscape from its upper floors, making it difficult to provide effective landscape mitigation. Also exacerbated by the siting of the BESS and substation within the setting.

The potential for harm to Grittleton House during construction via the siting of the works compound and cable route has currently not been identified and assessed and no mitigation is therefore proposed.

Harm to Rodbourne Conservation Area through the highway improvement works to the track leading to Site E has currently not been identified and no mitigation is therefore proposed. Other identified impacts are largely similar in severity but none will result in significant harm from the point of view of the EIA.

¹² National Guidance published in 2024, 'Nationally Significant Infrastructure Projects: Advice for Local Authorities'

Requirements recommended to the Examining Authority to mitigate impact

Should the ExA be minded to recommend approval of this proposal to the SoS then Wiltshire Council would request that the following requirements (conditions) be considered to mitigate the impacts identified above. For the sake of clarity, a full schedule of suggested requirements (conditions) and reasons are included in Appendix B.

Built Heritage		Requirement to be discharged by:	
Requirement	Reason	Secretary of State	Wiltshire Council
<p>Prior to the commencement of works in respect of Lime Down E, design details for the highway improvement works to the site access track from the South West of Rodbourne (which shall include details for mitigation of impact on the character and appearance of the conservation area) shall be submitted to and approved in writing by the LPA. The detailed design must be implemented as approved.</p> <p>Alternatively, details for the reinstatement of the track following the construction phase could be conditioned.</p>	<p>To secure appropriate mitigation of the heritage impact resulting from the upgrading of the construction access to Site E on the character and appearance of Rodbourne Conservation Area.</p>		<p>Yes</p>

Section 106 Requirements

Built Heritage	Reason (including justification for why a condition is not adequate)
None identified.	



Section 10: Public Health and Public Protection

Public Health

Overview and commentary

The proposed development raises notable concerns for public health and community wellbeing. The most significant issue identified is the potential impact on community identity and culture, which could lead to frustration, stress, anxiety, and associated mental health challenges for residents. These risks are particularly linked to poor community engagement during the construction phase, with similar concerns persisting through operational and decommissioning stages. While no positive or neutral impacts were recorded, the negative effects on mental health and social cohesion are considered material and significant.

To mitigate these impacts, Wiltshire Council recommends enforceable requirements, including a comprehensive communication strategy with measurable outcomes and an Outline Decommissioning Strategy addressing community identity and resilience. These measures aim to safeguard wellbeing and ensure effective engagement throughout the project lifecycle.

It should be noted that the proposals will significantly impact the amenity of the countryside including public rights of way, recreational space, general environmental change and interferences with character of the area. There are also numerous concerns about other environmental issues such as noise, vibration, pollution, fire risks, flooding, construction traffic, and the mental impact from the detriment caused. Public Health recognise and share the concerns about the mental health impact from the range of stressors from the proposals. Although the mitigations are primarily sought by environmental controls and adjustments from other departments, the council's Public Health team strongly support all protections and mitigations to protect the mental health of the local population.

Summary of main impacts

Public Health
Positive impacts – construction phase
None identified.
Positive impacts – operational
None identified.
Positive impacts – decommissioning phase
None identified.
Neutral impacts
None identified.
Negative impacts – construction phase
Impact on community identity and culture in surrounding areas. Risk of poor community engagement leading to frustration, stress and anxiety and mental health issues for residents.
Negative impacts – operational
Communities are likely to experience impacts on mental health and wellbeing, due to changes in community identity, culture and amenity of the area.

Negative impacts – decommissioning phase

Communities are likely to experience impacts on mental health and wellbeing, due to changes in community identity, culture and amenity of the area.

Ranking the Public Health impacts in importance

All the local impacts identified are considered material to the ExA, but in accordance with the national guidance¹³ the council would indicate the following as the most significant in relation to this theme:

Impact on community identity and culture in surrounding areas. Risk of poor community engagement leading to frustration, stress and anxiety and mental health issues for residents.

Requirements recommended to the Examining Authority to mitigate impact

Should the ExA be minded to recommend approval of this proposal to the SoS then Wiltshire Council would request that the following requirements (conditions) be considered to mitigate the impacts identified above. For the sake of clarity, a full schedule of suggested requirements (conditions) and reasons are included in Appendix B.

Public Health		Requirement to be discharged by:	
Requirement	Reason	Secretary of State	Wiltshire Council
No part of the authorised development may commence until a communication strategy be submitted and approved, with measurable and accountable outcomes for the mitigation on community identity and resilience impacts.	To ensure the community engagement and the safeguarding of community wellbeing		Yes
No part of the authorised development may commence until a Decommissioning Strategy is submitted and approved, to include mitigations for the impact on community identity and resilience.	To ensure the community engagement and the safeguarding of community wellbeing		Yes

Section 106 Requirements

Public Health	Reason (including justification for why a condition is not adequate)
None identified.	

¹³ National Guidance published in 2024, 'Nationally Significant Infrastructure Projects: Advice for Local Authorities'

Public Protection

Overview and commentary

The proposed development presents several public protection concerns, primarily related to environmental and amenity impacts during construction, operation, and decommissioning.

Please refer to Section 16 (pages 86 to 90) of Wiltshire Council’s Relevant Representation [[RR-4934](#)] for further technical details and evidence of these specific noise concerns. The headline issues include noise and vibration from site preparation, plant installation, and vehicle movements, as well as dust and air quality impacts from construction activities and emissions from non-road mobile machinery. During operation, noise from plant equipment and glint/glare effects from solar reflections pose risks to residential amenity. While mitigation measures are proposed through the 7.12 Outline Construction Environmental Management Plan [[APP-277](#)] and 7.13 Outline Operational Environmental Management Plan [[APP-278](#)], there are noted inconsistencies between these plans and the Environmental Statement, particularly regarding noise and vibration controls. The most significant concerns identified by the council are noise impacts, dust and air quality, and glint/glare. These are considered material to the examination process, and while mitigation is referenced in the draft DCO schedules, clarity and alignment between documents are essential before conditions can be finalised.

Summary of main impacts

Public Protection
Positive impacts – construction phase
None identified.
Positive impacts – operational
None identified.
Positive impacts – decommissioning phase
None identified.
Neutral impacts
None identified.
Negative impacts – construction phase
Noise impacts <ul style="list-style-type: none"> • The potential noise and vibration effects arising from Construction and Decommissioning phase activities (e.g. site preparation, installation of plant, construction of substations and structures, laying of cables and vehicle movements). Dust/Air Quality impacts <ul style="list-style-type: none"> • Dust generated during the construction, operation and maintenance and decommissioning phases; • Vehicle emissions during the construction and decommissioning phases; • Emissions from Non-Road Mobile Machinery (NRMM) (onsite plant)
Negative impacts – operational
Noise impacts <ul style="list-style-type: none"> • The potential noise effects arising from the operational plant over the lifetime of the scheme Glint/glare impacts

- Solar reflections causing harm to residential amenity

Negative impacts – decommissioning phase

Noise impacts

- The potential noise and vibration effects arising from decommissioning phase activities

Dust/Air Quality impacts

- Dust generated during the decommissioning phase
- Vehicle emissions during the decommissioning phase

Ranking the Public Protection impacts in importance

All the local impacts identified are considered material to the ExA, but in accordance with the national guidance¹⁴ the council would indicate the following as the most significant in relation to this theme:

Noise impacts

Mitigation is proposed but implemented via the 7.13 Outline Operational Environmental Management Plan [APP-278] (OOEMP) and 7.12 Outline Construction Environmental Management Plan [APP-277] (OCEMP), which are secured under requirement 13 and 14 of Schedule 2 within the dDCO [APP-016].

However, there are disparities between the mitigation set out in 6.1 Environmental Statement Volume 1, Chapter 14 Noise and Vibration [APP-066] and the mitigation contained within 7.13 Outline Operational Environmental Management Plan [APP-278] (OOEMP).

Dust/air quality

Mitigation is proposed and implemented via 7.12 Outline Construction Environmental Management Plan [APP-277] (OCEMP), which is secured under Requirement 13 of Schedule 2 within 3.1 Draft Development Consent Order [APP-016].

Glint/glare

Mitigation is proposed and implemented via 7.12 Outline Construction Environmental Management Plan [APP-277] (OCEMP), which is secured under Requirement 13 of Schedule 2 within 3.1 Draft Development Consent Order [APP-016].

Requirements recommended to the Examining Authority to mitigate impact

Should the ExA be minded to recommend approval of this proposal to the SoS then Wiltshire Council would request that the following requirements (conditions) be considered to mitigate the impacts identified above. For the sake of clarity, a full schedule of suggested requirements (conditions) and reasons are included in Appendix B.

¹⁴ National Guidance published in 2024, 'Nationally Significant Infrastructure Projects: Advice for Local Authorities'

Public Protection		Requirement to be discharged by:	
Requirement	Reason	Secretary of State	Wiltshire Council
Not Required. Once the OCEMP and OEMP issues have been resolved then further conditions will not be necessary.			Yes

Section 106 Requirements

Public Protection	Reason (including justification for why a condition is not adequate)
None identified.	



Section 11: Flood Risk and Drainage

Overview and commentary

As Lead Local Flood Authority (LLFA), Wiltshire Council has a number of duties and powers to manage flood risk arising from new development, as set out in the National Planning Policy Framework (MHCLG, 2023), the Town and Country Planning (Development Management Procedure) (England) Order 2015 (UK Government, 2015), the Flood and Water Management Act 2010 (UK Government, 2010), the Land Drainage Act 1991 (UK Government, 1991), and the Land Drainage Byelaws 2014 (Environment Agency, 2014).

Wiltshire Council Core Policy 67 states that development proposed in Flood Zones 2 and 3, as identified within the Strategic Flood Risk Assessment, should include measures to reduce the rate of rainwater run-off and improve rainwater infiltration to soil and ground. Policy 95 of the draft Wiltshire Local Plan (2023) requires all development proposals to consider the effect of the proposed development on flood risk from all sources, both on and off-site, commensurate with the scale and impact of the development. In addition, major development is expected to demonstrate at least 30% betterment relative to greenfield runoff rates, manage runoff as close to source as possible in accordance with the discharge hierarchy, and demonstrate that exceedance can be safely managed for the 1 in 100-year plus climate change event.

The main flood risk and drainage impacts of the Lime Down Solar Park proposal are summarised in the table below. The development incorporates a number of embedded mitigation measures which, if implemented as proposed, would limit the likelihood and severity of adverse flood risk and water quality effects relative to uncontrolled construction or operation. These include construction-phase drainage controls, operational drainage associated with substations and battery energy storage systems (BESS), and the use of SuDS-based features and sealed drainage with automatic isolation to limit uncontrolled discharges during abnormal events. The scheme would also remove agricultural fertiliser application across the site, reducing nutrient runoff pressures relative to the pre-development baseline.

However, notwithstanding these measures, the information submitted does not yet demonstrate that flood risk and drainage effects can be adequately managed across all phases of development. In particular, there remains uncertainty regarding the management of sediment-laden or hydrocarbon-contaminated runoff during construction, the absence of a defined SuDS retirement strategy at decommissioning, and unresolved matters relating to exceedance routing and long-term drainage performance.

Additional evidence gaps relate to the absence of a defined Flood Zone 3b, the potential implications of introducing additional impermeable areas, and the need to demonstrate that controlled discharges would not increase flood risk to receiving watercourses downstream. These matters are therefore considered further within the impact assessment and underpin the requirements identified in this section.

Relationship with the draft Development Consent Order

In preparing this Local Impact Report, Wiltshire Council has had full regard to the 3.1 Draft Development Consent Order [\[APP-016\]](#) submitted by the Applicant. The flood risk and drainage Requirements identified in this section do not seek to introduce parallel controls or to redesign the authorised development.

Instead, they are intended to clarify, strengthen or secure evidential certainty where the draft DCO relies on high-level commitments, assumptions, or the submission of further details at a later stage.

The council considers that these matters can be appropriately addressed through targeted amendments or additions to existing DCO Requirements, rather than through additional planning obligations, and that the approach set out remains proportionate and consistent with the Applicant’s consenting framework.

Summary of main impacts identified by Wiltshire Council

Drainage
(1) Summary of main impacts
Positive impacts – construction phase
<p>For clarity, the following are described as positive impacts in that they represent embedded mitigation measures which reduce the likelihood or severity of adverse flood risk and water quality effects compared with an unmanaged construction scenario or less sensitive construction methods. These measures do not result in hydrological enhancement or a reduction in baseline flood risk.</p> <ul style="list-style-type: none"> • 7.12 Outline Construction Environmental Management Plan (CEMP) [APP-277] includes temporary drainage and pollution control measures. • Proposed HDD is predominantly positive relative to open-cut excavation, as it reduces surface disruption and limit direct disturbance to drainage systems, subject to effective controls for breakout and groundwater risks. • The ES commits to implementing temporary drainage infrastructure (e.g., swales, settlement tanks, silt fences, straw bales) before and during works to manage runoff and prevent sediment-laden water entering watercourses. • Measures such as buffer zones, silt fencing, and staged excavation are embedded to control sediment at source, protecting water quality in adjacent ditches and streams. • Access tracks and working areas use permeable materials, reducing the extent of additional temporary impermeable area during construction compared to conventional hard-surfaced access. • Minimum 8 m development-free buffers around watercourses are maintained, reducing direct disturbance and runoff risk compared with uncontrollable encroachment.
Positive impacts – operational
<p>For clarity, the following are described as positive operational impacts in that they represent embedded design and management measures intended to limit adverse flood risk and water quality effects during operation, relative to a less controlled or unmanaged operational scenario. These measures do not constitute a reduction in baseline flood risk or hydrological enhancement beyond existing conditions.</p> <ul style="list-style-type: none"> • 7.13 Outline Operational Environmental Management Plan (OEMP) [APP-278] commits, in principle, to maintaining the performance of drainage infrastructure during operation. • Inclusion of Flood Risk Assessment and Drainage Strategy [APP-210], providing an overarching framework for managing surface water and drainage during the operational phase. • The solar panel arrays are designed to remain permeable, with grass or wildflower cover beneath and between rows. This preserves infiltration characteristics relative to existing

land use and limits changes to surface water flow patterns compared to a fully impermeable layout.

- Operational infrastructure such as substations and BESS areas incorporate SuDS-based drainage features, including permeable sub-bases, gravel-filled trenches, and French drains. These features attenuate runoff close to source and reduce the extent of concentrated discharge compared to conventional hardstanding drainage arrangements.
- Sealed and lined drainage systems with automatically actuating isolation valves with periodic auto-test and alarm are provided at BESS and substation areas. These prevent uncontrolled discharge during abnormal (e.g. fire or spill) by providing containment and controlled release mechanisms.
- Access routes use permeable surfacing (e.g., compacted gravel) and vegetated margins to reduce the extent of additional impermeable surfaces and associated runoff compared to conventional highway construction.
- Drainage design is intended to control discharge from formal hardstanding areas to greenfield runoff rates, subject to confirmation through detailed design and modelling, even under 1 in 100-year storm plus 45% climate change uplift.
- The scheme reduces nutrient runoff relative to the pre-development agricultural baseline, representing a relative improvement in water quality pressure.

Positive impacts – decommissioning phase

- The ES explicitly states that hydrology, flood risk, and drainage impacts during decommissioning will be similar to or lower than those during construction.
- All controls secured for construction—such as temporary drainage systems, silt fences, straw bales, pollution prevention, bunded storage, and HDD breakout contingency—will also apply during decommissioning.
- The ES commits to installing temporary drainage networks and robust maintenance plans during decommissioning to prevent mud/debris blockages and manage runoff effectively.
- Bunded fuel storage, designated refuelling zones, spill kits, and emergency response plans will remain in force during decommissioning, reducing contamination risk to watercourses and groundwater.
- The ES notes that soil handling and reinstatement protocols will be applied during decommissioning to restore ground conditions and maintain greenfield runoff characteristics.
- After embedded mitigation, all decommissioning-related effects on flood risk and water quality are predicted to be Minor Adverse and not significant in EIA terms, giving confidence in the robustness of the approach.
- Water for construction (dust suppression, welfare) will be sourced from licensed suppliers or mains, avoiding stress on local watercourses or aquifers.

Neutral impacts

- Instances where the scheme would not change the morphology of existing watercourses.
- Restoration of vegetation to existing baseline levels.

Negative impacts – construction phase

- Additional details needed in 7.12 Outline Construction Environmental Management Plan [[APP-277](#)] and potential 2D modelling to minimise changes to surface types increasing the risk of flooding and changes to the run-off response in the catchment.
- Overland flow management during construction not provided which could cause surface water runoff onto roads and increase pollution flows to watercourses, harming aquatic ecology.

- Prevention of debris getting to the road due to insufficient run off management, leading to safety implications for traffic due to the increased risk of accidents.
- Risk of soil compaction during haulage and working platform installation is not fully addressed. Without robust prevention and remediation measures, infiltration capacity could be reduced, increasing surface water runoff and flood risk.
- No evidence of pre and post-construction exceedance flow routing for the 1 in 100-year + climate change event. Temporary works could alter overland flow paths, concentrating runoff and elevating pluvial flood risk.
- Potential for sediment-laden or hydrocarbon-contaminated runoff during construction remains unless wheel washes, bunded refuelling zones, and monitoring protocols are implemented and enforced.
- HDD and temporary crossings near ordinary watercourses pose a risk of pollution and flow disruption if LLFA principles for works without Ordinary Watercourse Consent under the DCO are not agreed and applied.
- Site gradients (e.g. 128m to 102m across C1/C2) could accelerate runoff downslope during construction unless flow routing and erosion controls are actively managed.

Negative impacts – operational

- Flood zone 3B. Flood Zone 3b needs to be defined for effective planning, design and operation of site.
- Insufficient detail about land drainage issues can result in risk to road safety or increased flood risk for buildings and electrical infrastructure.
- Increase in impermeable areas. Infrastructure such as substations, BESS areas, and access tracks introduce permanent hardstanding. Without mitigation, this could lead to localised surface water flooding and increased runoff to downstream receptors.
- Potential increases in discharge of watercourses. Areas requiring controlled discharge (e.g. BESS and substations) could increase flow volumes to local ditches or watercourses, elevating flood risk downstream if not properly attenuated.
- Blockage of drainage networks. Operational drainage systems (SuDS, sealed systems) may become blocked by debris or sediment over time, causing localised flooding and potentially increasing flood risk off-site.
- Runoff from hardstanding areas can contain hydrocarbons, heavy metals, and silt, posing a risk to surface water and groundwater quality if not intercepted.
- Highway runoff and accidental spills. Even with low traffic volumes, maintenance vehicles and occasional heavy plant introduce risks of oil and fuel spills, which could migrate to watercourses during rainfall events.

Negative impacts – decommissioning phase

- No site-specific decommissioning runoff plan. The ES assumes decommissioning is “less than or equal to construction” without setting the temporary drainage layout, capacities, and sequencing for panel removal, track removal, compound locations, haul routes, and reinstatement timing. That raises a risk of short-term runoff spikes, silt mobilisation, and pathway changes during panel/track uplift.
- No SuDS retirement plan. It’s unclear which SuDS are removed, retained, or backfilled, and how sealed systems (BESS/substations) will be drained, sampled, and disposed of to licensed facilities before physical decommissioning. Lack of a plan can create pollution pathways or leave orphaned drainage structures altering greenfield hydrology.
- Soil Handling. Although soil compaction controls exist for construction, the ES does not describe decommissioning reinstatement targets (bulk density, infiltration rates, ground roughness/vegetation cover) nor post works verification to demonstrate predevelopment greenfield runoff equivalence.

- No decommissioning phase monitoring regime. There's reference to water quality monitoring in 7.12 Outline Construction Environmental Management Plan [APP-277] / 7.13 Outline Operational Environmental Management Plan [APP-278], but no specific decommissioning monitoring plan (trigger levels, locations, frequencies, reporting) to evidence that sediment/pollution are controlled during removal and restoration.
- The ES intends to disapply permitting via DCO with protective provisions. For decommissioning, there is no schedule for consents, notifications, or method statements where works touch ordinary watercourses or main river buffers during asset removal/backfill.
- Firewater containment and spill response are described for operation; decommissioning abnormal events (e.g. tank removal spills, residual fluid release, HDD backream extraction fluids) are not tailored to end of life activities with tested isolation/valving and contingency storage volumes.

Ranking the Flood Risk and Drainage impacts in importance

All the local impacts identified are considered material to the ExA, but in accordance with the national guidance¹⁵ the council would indicate the following as the most significant in relation to this theme:

Construction phase

- 1) Lack of demonstrated pre- and post-construction exceedance flow routing for 1 in 100-year plus Climate Change event.
- 2) Risk of sediment-laden or hydrocarbon-contaminated runoff unless wheel washes and bunded refuelling zones are enforced.
- 3) HDD near watercourses without agreed LLFA principles.

Operational phase

- 1) Flood Zone 3b has not yet been defined, meaning compliance with functional floodplain policy cannot current be confirmed.
- 2) Increase in impermeable areas (substations, BESS). Without mitigation, this could lead to localised flood risk.
- 3) Without mitigation, potential increases in discharge to watercourses elevating downstream flood risk.

Decommissioning phase

- 1) No site-specific decommissioning runoff management plan has been provided, including details of temporary drainage layouts, capacities and sequencing during infrastructure removal.
- 2) No SuDS retirement strategy has been defined, meaning it is currently unclear how drainage features would be retained, removed or backfilled at end of life, with a consequent risk of residual or orphaned drainage pathways.
- 3) Soil reinstatement performance targets and post-works verification criteria have not been defined, limiting the ability to confirm restoration of greenfield runoff and infiltration characteristics following decommissioning.

¹⁵ National Guidance published in 2024, 'Nationally Significant Infrastructure Projects: Advice for Local Authorities'

Requirements recommended to the Examining Authority to mitigate impact

Should the ExA be minded to recommend approval of this proposal to the Secretary of State then Wiltshire Council would request that the following requirements (conditions) be considered to mitigate the impacts identified above, particularly with respect to the requirement that all major developments should demonstrate $\geq 30\%$ betterment on greenfield runoff rates. For the sake of clarity, a full schedule of suggested requirements (conditions) and reasons are included in Appendix B.

Flood Risk and Drainage		Requirement to be discharged by:	
Requirement	Reason	Secretary of State	Wiltshire Council
<p>Detailed Construction Environmental Management Plan (CEMP) No development shall commence until a CEMP: Water and Pollution Control has been submitted to and approved by the LPA. The CEMP shall include:</p> <ul style="list-style-type: none"> (i) phased temporary drainage layouts (swales, cutoff drains, check-dams, settlement tanks) sized to control the 1 in 10-year event with mapped exceedance to safe locations; (ii) wheel-wash locations and maintenance; (iii) bunded fuel storage and designated refuelling zones; (iv) turbidity/oil sheen trigger levels and stop-work thresholds; (v) inspection frequencies, incident response and reporting. 	<p>To secure temporary drainage, pollution prevention, and sediment control measures during construction. This requirement amends and supplements the draft DCO Construction Environmental Management Plan requirement by specifying minimum flood-risk-critical content that must be included within the CEMP.</p>		Yes
<p>Pre- and Post-Construction Exceedance Flow Routing Plan Prior to commencement, a plan showing pre- and post-construction exceedance routes for the 1 in 100-year + climate change event shall be submitted to and approved by</p>	<p>To manage overland flow paths during extreme rainfall events and prevent concentrated runoff.</p>		Yes

Flood Risk and Drainage		Requirement to be discharged by:	
Requirement	Reason	Secretary of State	Wiltshire Council
the LPA, demonstrating that overland flow would be directed away from receptors (dwellings, highways, watercourses) during temporary works and operational phases.			
<p>Horizontal Directional Drilling (HDD) Method Statement and Frac-Out Contingency</p> <p>No trenchless crossing within 20 m of an ordinary watercourse shall commence until an HDD method statement and frac-out contingency plan is has been submitted to and approved in writing by the LPA.</p> <p>The approved details shall confirm how LLFA principles will be applied where ordinary watercourse consent would ordinarily be required (notwithstanding any DCO disapplication and the applicability of Protective Provisions).</p> <p>The authorised works shall thereafter be carried out in accordance with the approved details.</p>	To control the risk of drilling fluid breakout and subsurface migration associated with trenchless crossings near ordinary watercourses, and to prevent contamination of watercourses or groundwater that could result in flood-risk or water-quality impacts.		Yes
<p>Operational Drainage Inspection, Testing and Maintenance Plan</p> <p>Prior to operation of the authorised development, an asset register and Operational Inspection, Testing and Maintenance Plan shall be submitted to and approved in writing by the LPA for all SuDS and sealed and lined drainage systems, including those serving substations and battery energy storage systems.</p>	To ensure that SuDS and sealed drainage systems are inspected, tested and maintained over the operational lifetime of the development, preventing blockages, system failure and associated localised flood risk.		Yes

Flood Risk and Drainage		Requirement to be discharged by:	
Requirement	Reason	Secretary of State	Wiltshire Council
The approved plan shall include details of access points, inspection intervals, isolation valve automatic testing frequency, alarm and fail-safe arrangements, and KPI-based response times for blockages. The drainage systems shall thereafter be operated and maintained in accordance with the approved plan.			
<p>Flood Zone 3b Definition and Compliance Plan</p> <p>Prior to detailed layout approval, the applicant shall map Flood Zone 3b within the Order limits (using best available EA/LLFA guidance) and whether layout, levels, SuDS and access arrangements comply with functional floodplain policy; any assets within or interfacing with 3b must show resilience and no loss of flood storage. This should be submitted to the LPA alongside any application for detailed design consent.</p>	To ensure site layout and operational infrastructure comply with flood risk policy for functional floodplain.		Yes
<p>SuDS Retirement and Decommissioning Drainage Plan</p> <p>At least 12 months before decommissioning of any phase, a plan must be submitted to the LPA for approval identifying every SuDS/sealed system with its end-state (retain/ remove/ backfill), procedures to drain, sample and dispose of residual fluids/liners via licensed facilities, and sequencing of temporary drainage during removal. Decommissioning shall thereafter be carried out in</p>	To clarify the removal, retention or backfilling of drainage features at decommissioning, and to ensure the safe drainage, sampling and disposal of sealed systems so as to avoid residual flood risk or pollution pathways.		Yes

Flood Risk and Drainage		Requirement to be discharged by:	
Requirement	Reason	Secretary of State	Wiltshire Council
accordance with the approved plan.			
<p>Soil Reinstatement Targets and Verification</p> <p>The Decommissioning Plan shall define soil reinstatement performance targets (e.g. bulk density ranges, infiltration rates, surface roughness and vegetation cover), together with a verification regime including field and laboratory testing, to demonstrate recovery of greenfield hydrological performance following decommissioning.</p>	To ensure that soils are reinstated to a standard that restores infiltration capacity and greenfield runoff characteristics, avoiding residual increases in surface water runoff or flood risk following decommissioning.		Yes
<p>Decommissioning Water-Quality Monitoring</p> <p>No part of the authorised development shall be decommissioned until a Decommissioning Water-Quality Monitoring Plan has been submitted to and approved in writing by the LPA. The plan shall specify monitoring locations upstream and downstream of works, parameters to be monitoring (including, but not limited to, total suspended solids, pH and hydrocarbons), monitoring frequency, trigger levels and reporting arrangements. Decommissioning shall thereafter be carried out in accordance with the approved plan, with monitoring results report to the LPA, the Environment Agency and the LLFA.</p>	To evidence that sediment and pollution are effectively controlled during decommissioning, protecting watercourses and groundwater from adverse impacts during asset removal and restoration.		Yes
<p>Firewater and Spill Containment (Decommissioning)</p>	To ensure that abnormal events during decommissioning, including		Yes

Flood Risk and Drainage		Requirement to be discharged by:	
Requirement	Reason	Secretary of State	Wiltshire Council
<p>No part of the authorised development shall be decommissioned until details of firewater and spill containment have been submitted to and approved in writing by the LPA. The approved details shall include capacity calculations demonstrating adequate containment of firewater and spill volumes during dismantling activities, together with details of tested isolation valves, off-take points for removal and disposal, and on-site contingency storage. Decommissioning shall thereafter be carried out in accordance with the approved details.</p>	<p>firewater release or accidental spills, are effectively contained, preventing uncontrolled discharges and associated flood risk or pollution impacts.</p>		
<p>Substation and BESS Containment Performance Prior to operation of any substation or battery energy storage system, evidence demonstrating containment performance shall be submitted to and approved in writing by the LPA. The submitted evidence shall demonstrate that sealed and lined drainage systems and automatic isolation valves at substations and battery energy storage systems are capable of containing the greater of 110% of the largest vessel volume or the design rainfall event until removal, and shall include details of routine function testing and record keeping. The authorised development shall thereafter be operated in accordance with the approved containment measures.</p>	<p>To ensure that substations and battery energy storage systems are designed and operated with adequate containment capacity to prevent uncontrolled release of firewater, fuel or contaminated runoff, thereby avoiding residual flood risk and pollution impacts to land and watercourses.</p>		<p>Yes</p>

Flood Risk and Drainage		Requirement to be discharged by:	
Requirement	Reason	Secretary of State	Wiltshire Council
<p>Hydraulic modelling (1D–2D) and exceedance assessment</p> <p>No development shall commence until a single, integrated Hydraulic Modelling and Exceedance Assessment has been submitted to and approved in writing by the LPA. The assessment shall be prepared in accordance with the Environment Agency’s “Using modelling for flood risk assessments” and river modelling technical standards and shall:</p> <p>(a) Provide 2D surface-water modelling for the pre-construction, construction (temporary works), operational and decommissioning states for each PV area (A–E) and hydrologically connected land within the Order limits, together with an appropriate buffer (minimum 100 m), merged into contiguous domains where flow connectivity exists;</p> <p>(b) Include 1D–2D coupled fluvial modelling for all ordinary watercourses within or adjacent to the Order limits, to define Flood Zone 3b (functional floodplain) and interactions with site works;</p> <p>(c) Assess, as a minimum, the 1 in 30-year, 1 in 100-year and 1 in 100-year plus climate change events, including sensitivity testing for rainfall duration, culvert blockage and ground-condition roughness for pre-works,</p>	<p>To demonstrate that the authorised development would not alter flood-risk behaviour, including exceedance, and to support confirmation of compliance with functional floodplain and surface water flood-risk policies.</p>		<p>Yes</p>

Flood Risk and Drainage		Requirement to be discharged by:	
Requirement	Reason	Secretary of State	Wiltshire Council
<p>temporary works and operational states;</p> <p>(d) Demonstrate how exceedance routes are identified and safeguarded away from sensitive receptors (including dwellings, highways, watercourses and Public Rights of Way), and that the proposed drainage and earthworks would not increase flood risk elsewhere;</p> <p>(e) Provide model outputs including depth, velocity, hazard mapping and flow vectors, together with GIS layers; and</p> <p>(f) Include a quality assurance statement demonstrating compliance with Environment Agency modelling standards, together with a Model Review Note responding to Environment Agency and LLFA comments.</p> <p>Where the Applicant demonstrates that a specific parcel of land is hydrologically isolated and does not influence Flood Zone 3b definition or exceedance routing, the LPA may agree a proportionate reduction in model coverage for that parcel.</p>			

Section 106 Requirements

Flood Risk and Drainage	Reason (including justification for why a condition is not adequate)
None identified.	All flood risk and drainage mitigation required to address the impacts of the authorised development can be secured, enforced and maintained through Development Consent Order Requirements and planning-style conditions. No matters have been identified that require a Section 106 planning obligation in order to achieve acceptable flood-risk or drainage outcomes.



**Section 12:
Climate Change**

Overview and commentary

The Wiltshire Core Strategy Policy 42 states that proposals for standalone renewable energy schemes will be supported subject to satisfactory resolution of all site-specific constraints. Applicants will not be required to justify the overall need for renewable energy development, either in a national or local context.

The South Gloucestershire Local Plan Core Strategy 3 (CS3) also states that proposals for the generation of energy from renewable or low carbon sources will be supported, provided that the installation would not cause significant demonstrable harm to residential amenity. However, CS3 continues to say that renewable or low carbon energy installations will not be supported in areas covered by national designations and areas of local landscape value unless they do not individually or cumulatively compromise the objectives of the designations especially with regard to landscape character, visual impact and residential amenity.

Under the draft South Gloucestershire Local Plan (2025) LP25, proposals for major development will need to be supported by an Embodied Carbon Assessment that demonstrates a score of less than 900kg/sqm of carbon can be achieved within the development of the substructure, superstructure, and finishes.

The Lime Down Solar Park proposal will provide clean, renewable energy into the electricity grid, which supports the objectives of the Wiltshire Climate Strategy. The Scheme appears to have a very long Carbon Pay Back Time at a project level. Whilst it is acknowledged that in principle renewables (including utility-scale solar) will contribute to a net benefit in terms of decarbonisation at a national level, the submitted figures and narrative in the Environmental Statement do not support this perspective in terms of overall benefit. The main impacts of the Lime Down Solar Park proposal are summarised in the following table.

Summary of main impacts identified by Wiltshire Council

Climate Change
(1) Summary of main impacts
Positive impacts – construction phase
None identified.
Positive impacts – operational
The development will provide clean, renewable energy into the electricity grid. This supports Wiltshire Climate Strategy objectives
Positive impacts – decommissioning phase
None identified.
Neutral impacts
None identified.
Negative impacts – construction phase
As submitted, the figures provided by the Applicant for greenhouse gas emissions (6.1 Environmental Statement Volume 1, Chapter 7 Climate Change [APP-059]) show that the Scheme

has a very long Carbon Pay Back Time (CPBT), and may not recover the greenhouse gas emissions during the lifetime of the project. This is so different from the CPBT for similar developments as per literature / research (1-7 years), that it has raised concerns and the ExA may wish to request further detail. However, it is understood that national policy has established support for this kind of development: despite significant levels of carbon emissions at project level, the wider decarbonisation benefits of these projects are considered to be substantial and supportive of national policy. A similar development in another location would provide the same benefits as this Scheme in terms of energy generation and decarbonisation.

The Environmental Statement chapter on Climate Change should provide a transparent assessment of greenhouse gas emissions and assessment of significance, using an approach aligned with Institute of Environmental Management and Assessment (IEMA) as requested by the Inspectorate in its Scoping Opinion (Table 7-1. ES Chapter 7 [[APP-059](#)]). The assessment of significance used by the Applicant is limited. It is accepted that it is appropriate to consider the national Carbon Budgets, however IEMA guidance also recommends drawing on multiple sources of evidence to come to a view about significance in relation to a range of contexts, for example local carbon emissions and targets, national policy and sector-based emissions. The focus of this Environmental Statement report is somewhat narrower and considers the calculation of the project emissions and the potential for emissions reduction. This approach leads to a narrow assessment of significance, but also a narrow consideration of the benefits, leading to questioning whether the project pays back in terms of carbon. Whilst it is the council's understanding that the national policy to accelerate the deployment of renewables (including utility-scale solar) may have already considered the substantial GHG emissions involved, against the contribution of renewables infrastructure projects to wider decarbonisation, this does not come across on the figures and narrative submitted by the Applicant in their Environmental Statement. Therefore, the council requests clarification of emissions and net benefit, as part of transparent decision-making.

The timing of emissions is also significant, linked to the absence of a national strategic steer on location of renewables deployment: The GHG emissions during construction will occur during the UK Carbon Budget 4 and 5. The individual development is of course a small part of the emissions within the national budget, however since the Carbon Budget 4 and 5 are predicted to be exceeded by the increase in renewables called for by the Clean Power 2030 and Carbon Budgets and Growth Delivery Plan, any decision must be clear whether this particular development is a useful contribution to, or an appropriate use of those budgets. The council is aware that a Strategic Spatial Energy Plan is currently being developed by NESO, to effectively provide a strategic steer on how the power sector will utilise the carbon budgets, i.e. where and when renewables should be deployed. The council's view is that a decision on such a large renewables development should not be taken without such a plan, because without it there is no strategic steer on whether this is an appropriate location for a utility-scale solar farm.

For comparison of the scale of emissions, the GHG emissions caused during each year of the construction phase will be at a scale that is equivalent to approx. 4% of Wiltshire's current annual GHG emissions (based on 2023 total emissions, DESNZ), albeit not all of these emissions will be produced within Wiltshire. Significant levels of emissions continue throughout the operational phase as inverters and battery containers are planned to be replaced every 10 years, and transformers and panels at the 30-year point, all contributing to greenhouse gas emissions.

There are significant GHG emissions during the lifetime of the project, and particularly during construction phase which is at a time when the county and the country should be approaching net zero emissions, therefore the management plans must be required to minimise emissions as much as possible, if the development is permitted. The proposed GHG mitigation measures in 7.12

Outline Construction Environmental Management Plan [APP-277], 7.13 Outline Operational Environmental Management Plan [APP-278] and 7.14 Outline Decommissioning Strategy [APP-279] are welcomed, but could be further enhanced by using low emissions vehicles and equipment e.g. consider electric, Hydrotreated Vegetable Oil (HVO) or other alternative fuels; Construction of any roads or tracks should consider measures to reduce emissions from use of asphalt; maximise circularity of materials use through innovative recycling practices. Minimise water use e.g. by using rainwater for vehicle and equipment washdown. Since the main proportion of GHG gases being emitted in the county of Wiltshire are attributed to worker transport, this is a particular area for emissions mitigation, for example by using buses to transport workers, similar to the Hinkley power station scheme, and that these are Ultra Low Emission buses.

Negative impacts – operational

As submitted, the figures provided by the Applicant for greenhouse gas emissions (6.1 Environmental Statement Volume 1, Chapter 7 Climate Change [APP-059]) show that the Scheme has a very long Carbon Pay Back Time (CPBT), and may not recover the greenhouse gas emissions during the lifetime of the project. This is so different from the CPBT for similar developments as per literature / research (1-7 years), that it has raised concerns and the ExA may wish to request further detail. However, it is understood that national policy has established support for this kind of development: despite significant levels of carbon emissions at project level, the wider decarbonisation benefits of these projects are considered to be substantial and supportive of national policy. This issue would apply to a similar project in another location.

For comparison of the scale of emissions, the GHG emissions caused during each year of the construction phase will be at a scale that is equivalent to approx. 4% of Wiltshire's current annual GHG emissions (based on 2023 total emissions, DESNZ), albeit not all of these emissions will be produced within Wiltshire. Significant levels of emissions continue throughout the operational phase as inverters and battery containers are planned to be replaced every 10 years, and transformers and panels at the 30-year point, all contributing to greenhouse gas emissions.

The Environmental Statement chapter on Climate Change should provide a transparent assessment of greenhouse gas emissions and assessment of significance, using an approach aligned with Institute of Environmental Management and Assessment (IEMA) as requested by the Inspectorate in its Scoping Opinion (Table 7-1. ES Chapter 7 [APP-059]). The assessment of significance used by the Applicant is limited. It is accepted that it is appropriate to consider the national Carbon Budgets, however IEMA guidance also recommends drawing on a evidence to come to view about significance in relation to a range of contexts, for example local carbon emissions and targets, national policy and sector-based emissions. The scale of the carbon emissions of the project is large, at approximately 4% of Wiltshire's annual emissions, albeit not all the emissions would be originating within the county. The focus of this Environmental Statement report is somewhat narrower and considers the calculation of the project emissions and the potential for emissions reduction. This approach leads to questioning whether the project pays back in terms of carbon. Whilst it is the council's understanding that the national policy to accelerate the deployment of renewables (including utility-scale solar) may have already considered the substantial GHG emissions involved, against the contribution of renewables infrastructure projects to wider decarbonisation, this does not come across on the figures and narrative submitted by the Applicant in their Environmental Statement. Therefore, the council requests clarification of emissions and net benefit, as part of transparent decision-making.

There are significant GHG emissions during the lifetime of the project, and particularly during construction phase which is at a time when the county and the country should be approaching net zero emissions, therefore the management plans must be required to minimise emissions as much

as possible, if the development is permitted. The proposed GHG mitigation measures in 7.12 Outline Construction Environmental Management Plan [APP-277], 7.13 Outline Operational Environmental Management Plan [APP-278] and 7.14 Outline Decommissioning Strategy [APP-279] are welcomed, but could be further enhanced by using low emissions vehicles and equipment e.g. consider electric, HVO or other alternative fuels; Construction of any roads or tracks should consider measures to reduce emissions from use of asphalt; maximise circularity of materials use through innovative recycling practices. Minimise water use e.g. by using rainwater for vehicle and panel washdown. Since the main proportion of GHG gases being emitted in the county of Wiltshire are attributed to worker transport, this is a particular area for emissions mitigation, for example by using buses to transport workers, similar to the Hinkley power station scheme, and that these are Ultra Low Emission buses.

Negative impacts – decommissioning phase

As submitted, the figures provided by the Applicant for greenhouse gas emissions (6.1 Environmental Statement Volume 1, Chapter 7 Climate Change [APP-059]) show that the Scheme has a very long Carbon Pay Back Time (CPBT), and may not recover the greenhouse gas emissions during the lifetime of the project. This is so different from the CPBT for similar developments as per literature / research (1-7 years), that it has raised concerns and the ExA may wish to request further detail. However, it is understood that national policy has established support for this kind of development: despite significant levels of carbon emissions at project level, the wider decarbonisation benefits of these projects are considered to be substantial and supportive of national policy. This issue would apply to a similar project in another location.

The Environmental Statement chapter on Climate Change should provide a transparent assessment of greenhouse gas emissions and assessment of significance, using an approach aligned with Institute of Environmental Management and Assessment (IEMA) as requested by the Inspectorate in its Scoping Opinion (Table 7-1. ES Chapter 7 [APP-059]). The assessment of significance used by the Applicant is limited. It is accepted that it is appropriate to consider the national Carbon Budgets, however IEMA guidance also recommends drawing on evidence to come to view about significance in relation to a range of contexts, for example local carbon emissions and targets, national policy and sector-based emissions. The scale of the carbon emissions of the project is large, at approximately 4% of Wiltshire's annual emissions, albeit not all the emissions would be originating within the county. The focus of this Environmental Statement report is somewhat narrower and considers the calculation of the project emissions and the potential for emissions reduction. This approach leads to questioning whether the project pays back in terms of carbon. Whilst it is the council's understanding that the national policy to accelerate the deployment of renewables (including utility-scale solar) may have already considered the substantial GHG emissions involved, against the contribution of renewables infrastructure projects to wider decarbonisation, this does not come across on the figures and narrative submitted by the Applicant in their Environmental Statement. Therefore, the council requests clarification of emissions and net benefit, as part of transparent decision-making.

There are significant GHG emissions during the lifetime of the project, continuing through to decommissioning, therefore the management plans must be required to minimise emissions as much as possible, if the development is permitted. The proposed GHG mitigation measures in the draft Construction Environmental Management Plan, Operational Environmental Management Plan and Decommissioning Strategy are welcomed, but could be further enhanced by using low emissions vehicles and equipment e.g. consider electric, HVO or other alternative fuels; end of life treatment of equipment and materials is especially important during replacement and decommissioning phases, so the management plans should include practices to maximise circularity of materials use through innovative recycling practices, and developing the recycling

industry locally or regionally. Minimise water use e.g. by using rainwater for vehicle and panel washdown. Since the main proportion of GHG gases being emitted in the county of Wiltshire are attributed to worker transport, this is a particular area for emissions mitigation, for example by using buses to transport workers, similar to the Hinkley power station scheme, and that these are Ultra Low Emission buses.

Ranking the Climate Change impacts in importance

All the local impacts identified are considered material to the ExA, but in accordance with the national guidance¹⁶ the council would indicate the following as the most significant in relation to this theme:

- 1) Greenhouse gas emissions must be minimised as much as possible, through further measures included in 7.12 Outline Construction Environmental Management Plan [APP-277], Outline Operational Environmental Management Plan [APP-278] and 7.14 Outline Decommissioning Strategy [APP-279].
- 2) Greenhouse emissions assessment and significance: the figures and report submitted (Environmental Statement) do not seem to support the accepted view that that renewables deployment contributes to carbon emissions reduction.
- 3) Lack of Strategic Spatial Energy Plan makes it unclear whether a scheme of this scale is appropriate in this area or location.

Requirements recommended to the Examining Authority to mitigate impact

Should the ExA be minded to recommend approval of this proposal to the Secretary of State then Wiltshire Council would request that the following requirements (conditions) be considered to mitigate the impacts identified above. For the sake of clarity, a full schedule of suggested requirements (conditions) and reasons are included in Appendix B.

Climate Change		Requirement to be discharged by:	
Requirement	Reason	Secretary of State	Wiltshire Council
Development must not commence until the management plans have been approved, to include measures that minimise greenhouse gas emissions, especially during the construction phase, through the Construction Environmental Management Plan, Operational Environmental Management Plan and Decommissioning Strategy, especially around the use of ultra-low emissions vehicles, and embodied carbon.	To reduce GHG emissions as much as possible		Yes

¹⁶ National Guidance published in 2024, 'Nationally Significant Infrastructure Projects: Advice for Local Authorities'

Climate Change		Requirement to be discharged by:	
Requirement	Reason	Secretary of State	Wiltshire Council
Development must not commence until the management plans have been approved, to include measures relating to recycling of panels. E.g. work with circular economy organisations to ensure recycling of panels and other materials, collaborating on innovative approaches as necessary, working with local organisations and finding local solutions where possible.	Minimise environmental impact, GHG emissions and in particular embodied carbon and improve circularity of materials use.		Yes

Section 106 Requirements

Climate Change	Reason (including justification for why a condition is not adequate)
None identified.	



**Section 13: Soils
and Agriculture**

Overview and commentary

Wiltshire has a proud farming tradition going back for thousands of years. Around 78% of the county is currently farmed (273,555 ha of Wiltshire's total 348,500 ha) and farming continues to be an essential determinant of landscape character in all areas of the county. Wiltshire Council has regulatory responsibility for managing Wiltshire's natural environment and landscape.

Policy LP26 in the Draft South Gloucestershire Local Plan (2025) states that proposals for the generation of renewable energy and associated infrastructure must include measures to enhance and enable nature and biodiversity in scheme design for the lifetime of the development.

Policy 2 in the Joint Melksham Neighbourhood Plan 2 (2025) states that local renewable and low carbon energy generation proposals, along with associated infrastructure, will be supported where it can be demonstrated that the siting and scale of the proposal is appropriate to its setting. Furthermore, ground mounted solar photovoltaic development should demonstrate, where possible, that some form of agricultural activity will continue and /or there are biodiversity improvements around arrays. Policy 13 seeks for field based solar farms to deliver at least a 10% improvement in biodiversity value within and where appropriate beyond the site in order to deliver tangible benefits for biodiversity.

The main impacts of the Lime Down Solar Park proposal are summarised in the following table.

Summary of main impacts identified by Wiltshire Council

Soils and Agriculture
(1) Summary of main impacts
Positive impacts – construction phase
Payments to landowners start
Positive impacts – operational
Possible increase in carbon capture – would need to be evaluated Increase in BNG
Positive impacts – decommissioning phase
None identified.
Neutral impacts
None identified.
Negative impacts – construction phase
Reduction in agricultural production 5000t combinable crops, unable to quantify loss from livestock sector Loss of 20 farming related jobs as predicted by the applicant Soil compaction Potential for pollution incidents Reduction in bio-diversity

Negative impacts – operational
Reduction in agricultural production Loss of farming related jobs
Negative impacts – decommissioning phase
Reduction in agricultural production 5000t combinable crops, though this does not take into account potential yield increases with new varieties over the operational life of the scheme. Unable to quantify losses from the livestock sector Soil compaction Potential for pollution incidents Reduction in bio-diversity

Ranking the Soils and Agriculture impacts in importance

All the local impacts identified are considered material to the ExA, but in accordance with the national guidance¹⁷ the council would indicate the following as the most significant in relation to this theme:

- Loss of jobs and expertise related to food production
- Reduced food production for consumption in the UK
- Potential for tenanted farms to become unviable
- Potential for pollution to occur – e.g. fuel spills
- Soil compaction – should only be an issue during the decommissioning phase

Requirements recommended to the Examining Authority to mitigate impact

Should the ExA be minded to recommend approval of this proposal to the Secretary of State then Wiltshire Council would request that the following requirements (conditions) be considered to mitigate the impacts identified above. For the sake of clarity, a full schedule of suggested requirements (conditions) and reasons are included in Appendix B.

Soils and Agriculture		Requirement to be discharged by:	
Requirement	Reason	Secretary of State	Wiltshire Council
No part of the scheme should commence until a pollution incident plan has been submitted to and approved by the local planning authority	To minimise the impact of any pollution incidents		Yes
If during the lifetime of the scheme any of the land that is a part of the scheme is to be used for livestock, then Wiltshire Council would need to be consulted and agree on	To eliminate any damage that could be caused by livestock during the operational phase to equipment and the general public. This should		Yes

¹⁷ National Guidance published in 2024, 'Nationally Significant Infrastructure Projects: Advice for Local Authorities'

Soils and Agriculture		Requirement to be discharged by:	
Requirement	Reason	Secretary of State	Wiltshire Council
fencing/protective equipment required. This should be submitted and approved by the local planning authority through the detailed design requirement.	be incorporated into the initial construction phase.		
No part of the scheme should be started until a comprehensive soil sampling scheme has been submitted to and approved by the local planning authority in writing, to include inspection of subsurface for signs of compaction using test manually dug holes	To ensure the soil is in a fit state to resume agricultural production after decommissioning is completed.		Yes

Section 106 Requirements

Soils and Agriculture	Reason (including justification for why a condition is not adequate)
None identified.	



**Section 14: Development
Management and
Strategic Planning**

Overview and commentary

The Lime Down Solar Park proposal would make a major contribution to both national and local climate change objectives, and its overall strategic direction is strongly supported by national planning policy and Wiltshire’s Climate Strategy. However, despite this, the council is currently unable to confirm full policy compliance because several areas of required evidence and mitigation have not yet been provided.

A principal concern is the significant loss of agricultural land that would result from the development, with 878 hectares, around 30 percent of which is Best and Most Versatile (BMV) land, being taken out of food production for at least 60 years. This would equate to an estimated loss of approximately 5,000 tonnes of crops annually, and the council still awaits essential information regarding alternative land availability, long-term soil remediation, pollution protocols, and whether grazing beneath the panels is genuinely feasible.

Cumulative landscape and visual impacts also remain a major unresolved issue. North Wiltshire has already experienced a concentration of solar and battery infrastructure, and the assessments provided by the applicant do not yet fully address the cumulative or sequential effects, particularly along the Fosse Way and key transport corridors. These omissions mean the overall landscape impact of the scheme cannot yet be properly understood.

In addition, the proposed Battery Energy Storage System raises a point of uncertainty, as the submitted documents contain an inconsistency regarding whether the fire suppression system is an integral component or merely an “optional” feature. This inconsistency requires clarification before the council can be satisfied that appropriate fire-safety measures are embedded in the design.

Overall, while the project aligns well with national and local ambitions for climate change, its acceptability in planning terms depends on resolving the significant issues relating to agricultural land loss, cumulative landscape effects, and BESS safety, as well as providing the outstanding information necessary to demonstrate full policy compliance.

Summary of main impacts

Development Management and Strategic Planning
(1) Summary of main impacts
Positive impacts – construction phase
None identified.
Positive impacts – operational
National and Local Policy Context for Low Carbon Energy Developments
The applicant sets out the legislative and planning policy context for the project in Section 6 of 7.2 Planning Statement [APP-267]. Section 8 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 detailed assessment of how the project accords with relevant policies.
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.'

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.

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.

Policies CP1 and CP2 of the Wiltshire Core Strategy relate to the spatial strategy for Wiltshire, setting the policy foundations for the promotion of sustainable development within the county. The scheme is for a standalone renewable energy installation and will not directly impact existing housing or employment sites. The scheme will result in some employment provision in the form of construction jobs but does not relate explicitly to employment development.

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 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.

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.

Wiltshire Council's Climate Strategy and delivery plans are supportive of measures to reduce the effects of climate change, 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.

In summary, the proposal will offer a significant contribution to reducing the effects of climate change, including contributions to national carbon reduction objectives and targets. In that context, 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. However, compliance with local and national planning policy cannot yet be demonstrated due to outstanding information and insufficient mitigation proposals.

Positive impacts – decommissioning phase

None identified.

Neutral impacts

None identified.

Negative impacts – construction phase

Best and Most Versatile (BMV) agricultural land

The *Overarching NPS For Energy* which was published in January 2024 is a material consideration in determining applications under the Town and Country Planning Act 1990 (TCPA) – the NPS is relevant for both NSIPs and small-scale development determined at a local level. Following its publication, in May 2024, a Written Ministerial Statement (WMS) was made by the Secretary of State for Energy Security and Net Zero. The WMS sets out further detail on balancing the competing priorities of energy security and food production including the following point:

'Due weight needs to be given to the proposed use of Best and Most Versatile land when considering whether planning consent should be granted for solar developments. For all applicants the highest quality agricultural land is least appropriate for solar development and as the land grade increases, there is a greater onus on developers to show that the use of higher quality land is necessary.'

The NPS and NPPF defines best and most versatile (BMV) agricultural land as *land in grades 1, 2 and 3a of the Agricultural Land Classification*

Footnote 65 of the NPPF expresses the following:

'Where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality.'

Paragraph 013 (ID: 5-013-20150327) of the Planning Practice Guidance (PPG) includes the following summarised guidance:

'The LPA should encourage the effective use of land by focusing large scale solar farms on previously development and non-agricultural land.'

'Solar farms are normally temporary structures and planning conditions can be used to ensure that the installations are removed when no longer in use and that the land is restored to its previous use.'

Policy CP42, criteria (viii) of the Wiltshire Core Strategy expresses the need for proposals for standalone renewable energy schemes to satisfactorily consider best and most versatile agricultural land.

The Wiltshire Climate strategy (2022-2027) includes the following objective relevant to the natural environment, food and farming:

'Efficient and environmentally sensitive use of land, providing for the needs of an increasing population and nature; food production, renewable energy generation, housing and transport alongside woodland creation and nature recovery.'

In this case 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 council has sought further evidence from the Applicant that a full and comprehensive assessment of land, at a lower level than BMV, has been conducted.

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 tonnes of combinable crops, worth in the region of £750,000 per year. To put this in context, the UK produced 20 million tonnes of combinable crops in 2024, lower than normal due to the challenging weather conditions experienced in the growing season.

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.

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.

One benefit of taking this land out of agricultural production for at least 60 years will be the improvement to soil health should this land revert to food production again, and the increased carbon sequestration that will occur compared with if it remains in its current use. The council would also anticipate an increase in biodiversity. However, at this moment in time, it is very hard to monetarise these benefits.

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'.

Another area missing from 7.15 Outline Soil Resources Management Plan [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.

In summary, the development 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. In order to assess whether the proposal will meet with local and nation planning policy, the following would need to be provided:

- 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.

Negative impacts – operational

Cumulative impacts

In the recent past, Wiltshire has been subject to multiple applications and developments of solar array, battery storage and associated infrastructure, with a concentration in the north of the county where the Lime Down development would take place. A consideration of the cumulative impacts of such development is therefore required.

In addition to providing further guidance around Protecting the Best Agricultural Land, the 2024 Written Ministerial Statement provided the following summarised comment on addressing cumulative impacts:

'[...] we are increasingly seeing geographical clustering of proposed solar developments in some rural areas. [...] When considering whether planning consent should be granted for solar development it is important to consider not just the impacts of individual proposals, but also whether there are cumulative impacts where several proposals come forward in the same locality.'

Relating primarily to visual and landscape impacts, at its full council meeting on 21 May 2024, Wiltshire Council voted to support a motion calling for further guidance over its strategy for delivering solar farms. The motion (no. 2024-03 – Solar Farms) is summarised below:

'[...] this council is increasingly concerned at the concentration of solar farms, battery storage and associated infrastructure in Wiltshire. Some villages are now completely surrounded by solar farms and their continued concentration represents a significant cumulative impact and industrialisation of the countryside.

Wiltshire Council therefore calls on the Secretary of State for the Department of Levelling Up, Housing and Communities to define more closely what is meant by 'cumulative impact' regarding solar farms and to take clear steps to ensure that solar developments are more evenly spread across the UK [...]'

No response to the motion was provided by the then Government, but revisions to the NPPF were made along with Written Ministerial Statements. Indeed, although not touching upon cumulative impacts, it should be noted that the notes accompanying the Autumn Budget (issued 30 October 2024) repeatedly references the need to invest in clean energy. In this context, this report provides some analysis and consideration of cumulative impacts of solar farms in Wiltshire.

Policy CP42 of the Wiltshire Core Strategy is explicit that assessment of factors relating to standalone renewable energy installations should include assessment of any cumulative effects.

The PPG offers the following summarised guidance in relation to assessing consideration of cumulative landscape and visual impacts of renewable energy development:

'The cumulative landscape impacts are the effects of a proposed development on the fabric, character and quality of the landscape; it is concerned with the degree to which a proposed renewable energy development will become a significant or defining characteristic of the landscape.

Cumulative visual impacts concern the degree to which proposed renewable energy development will become a feature in particular views (or sequences of views), and the impact this has upon the people experiencing those views. Cumulative visual impacts may arise where two or more of the same type of renewable energy development will be visible from the same point or will be visible shortly after each other along the same journey. [...]'

Although 'locality' as specified within the WMS is not defined, Wiltshire Council's motion indicates that separate development proposals for solar farms within, or surrounding, the same village have collectively impacted that setting.

In this case, and as is identified in the council's Landscape Officer comments, 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. The approach which has been adopted within 3.1 Draft Development Consent Order [[APP-016](#)] has been assessed by the council's Landscape Officer, with several omissions and inadequacies identified. In particular, it was of concern 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 and E; then land at Red Barn north east of Kington St Michael. It does not appear that these sequential assessments have been undertaken as part of the ES.

Fire Safety of Battery Energy Storage System (BESS)

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 Lane, Hullavington and extending to a site area of 5.5Ha.

Within the submitted 6.3 Environmental Statement Volume 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 worst 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 3.5m between blocks and 0.9m between adjacent and back-to-back containers.

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.

6.3 Environmental Statement Volume 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.

Separately, 3.1 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.

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 6.3 Environmental Statement Volume 3, Appendix 3-1 Substations and Battery Energy Storage System Description [[APP-182](#)]. 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 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 in 6.3 Environmental Statement Volume 3, Appendix 3-1 Substations and Battery Energy Storage System Description [[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.

Negative impacts – decommissioning phase

None identified.

Ranking the Development Management and Strategic Planning impacts in importance

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 approximately 50 megawatts (MW) and associated development comprising Battery Energy Storage System (BESS) Area, substations, grid connection infrastructure and other infrastructure integral to the construction, operation and maintenance, and decommissioning phases. 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).

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 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.

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 240m north.

The cable route corridor element of the application site is described as having a variable width from 50m, up to 665m 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.

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.

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 220m to the west) and the towns of Chippenham, Corsham and Melksham towards the southern section of the cable route corridor.

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. Similarly, whilst the application site is not within any ecological designation, there are four statutory internationally designated ecological sites located within 30km. 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 5km 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 2km 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 2km of the solar PV and 250m 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 2km of the Solar PV Sites.

All the local impacts identified are considered material to the ExA, but in accordance with the national guidance¹⁸ the council would indicate the following as the most significant in relation to this theme:

- The proposal will offer a **significant contribution towards reducing the impacts of climate change**, including contributions to national carbon reduction objectives and targets. In that context, 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.
- The development 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. In order to assess whether the proposal will meet with local and national planning policy, the following would need to be provided:
 - 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.
- **Cumulative impact on landscape**
In the recent past, Wiltshire has been subject to multiple applications and developments of solar array, battery storage and associated infrastructure, with a concentration in the north of the county where the Lime Down development would take place. A consideration of the cumulative impacts of such development is therefore required.

In this case, the submitted Cumulative Impact Assessment has been assessed, with several omissions and inadequacies identified. In particular, it was of concern 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 and E; then

¹⁸ National Guidance published in 2024, ‘Nationally Significant Infrastructure Projects: Advice for Local Authorities’

land at Red Barn north east of Kington St Michael. It does not appear that these sequential assessments have been undertaken as part of the ES.

- **Fire Safety of Battery Energy Storage System (BESS)**

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 6.3 Environmental Statement Volume 3, Appendix 3-1 Substations and Battery Energy Storage System Description [APP-182]. 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 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 in 6.3 Environmental Statement Volume 3, Appendix 3-1 Substations and Battery Energy Storage System Description [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.

Requirements recommended to the Examining Authority to mitigate impact

Should the ExA be minded to recommend approval of this proposal to the SoS then Wiltshire Council would request that the following requirements (conditions) be considered to mitigate the impacts identified above. For the sake of clarity, a full schedule of suggested requirements (conditions) and reasons are included in Appendix B.

Development Management and Strategic Planning		Requirement to be discharged by:	
Requirement	Reason	Secretary of State	Wiltshire Council
None identified.			

Section 106 Requirements

Sec 106 requirement	Reason (including justification for why a condition is not adequate)
None identified.	

A close-up photograph of a person's hand holding a single green leaf. The hand is positioned at the bottom left, with fingers gently gripping the leaf. The leaf is vibrant green and shows clear vein patterns. The background is a soft, out-of-focus green, suggesting a lush, natural environment. A white rectangular box is overlaid on the right side of the image, containing the text 'Section 15: Arboriculture' in a bold, dark blue font.

Section 15: Arboriculture

Overview and commentary

The proposed Lime Down Solar Park is expected to result in significant arboricultural harm, primarily due to the loss of trees, woodland edges and extensive lengths of hedgerow required for the construction of solar arrays, access tracks and the cable route corridor. The extent of hedgerow removal is uncertain and potentially substantial, as DCO Schedule 12, Part 1 to Part 3, of 3.1 Draft Development Consent Order [APP-016] does not provide measurements - even for ancient hedgerows protected under the Hedgerow Regulations 1997.

Impacts on ancient woodland, including incursions into the 15m buffer around Surrendell Wood and North Bincombe Wood, further highlight the sensitivity of the affected landscape. A central concern is that the Arboricultural Impact Assessment and Outline Arboricultural Method Statement are indicative, incomplete and non-compliant with BS 5837:2012. Key construction details, trenching locations, access points and easements will only be finalised post-DCO, meaning the true scale of tree loss and root damage cannot currently be understood. Supporting plans also lack clarity, fail to show essential buffers, and provide insufficient information on risks associated with construction methods, BESS foundations and potential soil contamination.

Given these limitations, the proposals presently do not demonstrate that arboricultural impacts have been properly assessed or mitigated. The uncertainty surrounding tree and hedgerow loss, combined with the inadequacy of supporting technical documents, represents a major issue for determination. Substantial revision, clearer commitments, and compliant arboricultural documentation will be required to ensure that harm to trees, hedgerows and ancient woodland is avoided or minimised.

Core Policy 50 – Biodiversity requires that all development should seek opportunities to enhance biodiversity. Major development in particular must include measures to deliver biodiversity gains through opportunities to restore, enhance and create valuable habitats, ecological networks and ecosystem services. Such enhancement measures will contribute to the objectives and targets of the Biodiversity Action Plan (BAP) or River Basin/Catchment Management Plan, particularly through landscape scale projects, and be relevant to the local landscape character.

Core Policy 51 – Landscape requires that development should protect, conserve and where possible enhance landscape character and must not have a harmful impact upon landscape character, while any negative impacts must be mitigated as far as possible through sensitive design and landscape measures. Proposals should be informed by and sympathetic to the distinctive character areas identified in the relevant Landscape Character Assessment(s) and any other relevant assessments and studies. In particular, proposals will need to demonstrate that aspects of landscape character have been conserved and where possible enhanced through sensitive design, landscape mitigation and enhancement measures.

Core Policy 52 - Green infrastructure requires that development shall make provision for the retention and enhancement of Wiltshire's green infrastructure network and shall ensure that suitable links to the network are provided and maintained.

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.

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.

Summary of main impacts

Arboriculture
(1) Summary of main impacts
Positive impacts – construction phase
Considering the current status of the trees within the natural environment of the proposed solar park, there are no positive impacts relating to construction or operational.
Positive impacts – operational
None identified.
Positive impacts – decommissioning phase
None identified.
Neutral impacts
None identified.
Negative impacts – construction phase
<p>The construction phase is going to result in a significant loss of both trees and hedgerows, and the impacts will differ between the construction of the Solar PV sites, the cable route corridor and BESS. Whilst tracks are being installed to make the sites accessible during operation, the construction traffic will require a more substantial area of ground for movement due to the size of some of the machinery, resulting in the loss of well-established hedgerows and trees, and subsequently canopy cover and wildlife habitat, as well as potential for loss of parts of ancient woodland.</p> <p>Despite creating a 15m buffer zone to protect the boundaries of trees and woodland, intrusion into this area will be required to accommodate construction traffic. This has potential to cause permanent damage to ancient woodland.</p> <p>Although hedgerows are discussed within the ecology section, and the Arboricultural section of the application covers impacts on trees and woodlands only, it does not go unnoticed that there are 32 pages within the Draft DCO Schedule 12, Part 1 and Part 2, of 3.1 Draft Development Consent Order [APP-016] that identifies parts of hedgerows for removal to facilitate the construction and ongoing operational requirements of the Solar Park. No measurements of removal have been provided, therefore the removal of part of a hedgerow, for example Part 2 Ancient Hedgerow Removal CRH24 “Removal of part of approximately 694m of hedgerow within the area identified by an orange line on sheet 16 of the hedgerows plan” could potentially result in the removal of 690m of ancient hedgerow as drafted. It should be noted that under the Hedgerow Regulations 1997,</p>

most hedgerows likely to be removed within Schedule 12, Part 1 to Part 2 of 3.1 Draft Development Consent Order [APP-016] would require consent from the Local Planning Authority, with sufficient reasoning and reinstatement/replacement plans provided.

The 6.3 Environmental Statement Volume 3, Appendix 10-1 Arboricultural Impact Assessment and Outline Arboricultural Method Statement [APP-206] is not currently listed within Schedule 13 of 3.1 Draft Development Consent Order [APP-016] but should be included in its own right for clarity. The Arboricultural Impact Assessment (AIA) highlights that arboricultural impacts remain uncertain because plans for trenching, permanent easements, temporary access points and visibility splays are only indicative until finalised post-DCO by the engineering team. As a result, tree removal may be required to achieve necessary working widths, trenching space, easements and construction access, with further root and canopy impacts possible where access tracks need widening or resurfacing. These effects could extend to ancient woodland, category A–C trees and potentially hedgerows along the Cable Route Corridor.

The Outline Arboricultural Method Statement (OAMS) is not written in accordance with BS5837:2012 and leaves all processes open to misinterpretation. The use of hand dig in areas where roots are likely to be present, such as within the Root Protection Area (RPA), is ambiguous and undefined, as is the methods and materials proposed for construction of every part on infrastructure that could have potential negative impacts on trees and their roots. It should be noted that the RPA is a guideline by BS5837:2012 for the prevention of the destruction of roots during excavation, and the subsequent loss of trees, however soil contamination can result outside of the RPA when using chemicals, such as concrete or bitumen, and therefore additional methods are required to prevent leaching and uptake from fibrous roots.

A temporary construction compound for the Cable Route Corridor is proposed within the 15m wide ancient woodland buffer zone of W0001 - Surrendell Wood. Whilst the existing gravel track may be compacted from use of heavy machinery, it may not be wide enough for the unusual wide and tall loads required to facilitate the construction of the cable route.

It is also noted that the 6.2 Environmental Statement Volume 2, Figure 3-4-1 to 3-4-5.2 Landscape and Ecology Mitigation Plan [APP-084] does not demonstrate Surrendell Wood in its entirety, nor the proposed adjacent temporary construction compound. There are no mitigated measures shown for this area, as suggested for the rest of the plans.

The 6.2 Environmental Statement Volume 2, Figure 10-2-1 to 10-2-23 Tree Impacts Plans [APP-134] fail to clearly identify the 15m buffer zone. The plans show proposed location of the tracks (identified on the plans as a brown line) and the field accesses and cross over points in relation to retained trees, woodlands and hedgerows. The tracks, accesses and crossover points are clearly within proximity to the RPA of many trees and hedgerows, increasing the possibility of damage to the roots during excavation and installation. By moving the tracks and access away from the trees and towards the fields by metres, it will reduce the impact on these trees and hedgerows, resulting in the possible retention of the A, B and C category trees mentioned in the Arboricultural Impact Assessment [APP-206], and reduce the amount of hedgerow removal mentioned in Schedule 12, Part 1 to Part 2, of 3.1 Draft Development Consent Order [APP-016].

The potential loss of trees and hedgerows due to the impacts of the proposed location of the tracks and accesses is not considered appropriate to be included within The Rochdale Envelope due to the irreversible reduction of the overall arboricultural footprint. The Tree Impacts Plans [APP-134] need to be revised to show that this has been achieved, and these need to be submitted prior to determination of the DCO, with sufficient time to ensure that all arboricultural features have been

given consideration. Justification for the inclusion into the RPA of each tree or hedgerow should be provided in the event that this is not achievable.

The Tree Impacts Plans [APP-134] should provide precise details of proposed Solar PV sites, associated infrastructure, the cable route, and access tracks in relation to trees, groups and woodlands. It has plotted the trees, groups, and woodlands with the Solar PV area and tree survey reference number. The category of the trees, groups, and woodlands are also identified on the plans as a small centre colour indicating the stem location, however due to the poor resolution it is not always possible to determine the colour. This requires constant relaying between the Tree Impacts Plans and the Tree Survey Schedule [APP-208], and the category should be clearly shown next to the tree survey reference number.

There is no information regarding the foundations of the BESS other than a small paragraph within 7.4 Design Principles and Parameters [APP-269] which relies on soil type for the type and depth of foundations possibly required. As these sites are limited in number, it would be hoped that the soil type and investigations would have determined the extent of the foundations and subsequently the proposed methods and materials to be used for installation. It should be noted that sufficient and appropriate impermeable membrane root barriers will be required prior to installing any type of pile and/or strip foundation.

Negative impacts – operational

The presence of the Solar PV Sites will require constant monitoring and maintenance of trees and hedgerows to ensure that they do not create a hazard to the operation of the panels, or a safety risk to those attending the site. Redirection of footpaths and bridleways will also result in long-term management and subsequently works to trees.

Negative impacts – decommissioning phase

None identified.

Ranking the Arboriculture impacts in importance

All the local impacts identified are considered material to the ExA, but in accordance with the national guidance¹⁹ the council would indicate the following as the most significant in relation to this theme:

1. Whilst predominately addressed within Ecology, 6.1 Environmental Statement Volume 1, Chapter 9 Ecology and Biodiversity [APP-061], the biggest impact on the whole site, including Solar PV sites and the cable route corridor is the potential loss of important hedgerows, the amount of which is indeterminate due to lack of information within Schedule 12 of the Draft DCO [APP-016]. Whilst loss of trees is also inevitable, the loss of wildlife habitat, visual and sound screening, and soil disruption comprises of the eradication of important features of the Wiltshire countryside. As mentioned above, these important hedgerows are protected by the Hedgerow Regulations 1997. It is not considered appropriate for the removal of important hedgerows to be associated with the Rochdale Envelope as their removal should be defined.
2. The Arboricultural Impact Assessment and Outline Arboricultural Method Statement Ref [APP-206] is not included in Schedule 13 of the 3.1 Draft DCO [APP-016] – Documents and Plans to be

¹⁹ Planning Inspectorate Advice Note 1, Local Impact Reports, Version 2, April 2012

certified Part 1. This document should be added for its own merits for clarity, rather than its contents redistributed across other sections of the DCO.

- Arboricultural impacts discussed within the AIA are ambiguous as the plans and statements provided are indicative. Given that the exact location of the trenching and permanent easement of the cable route corridor will be determined post-DCO by the engineering team, the temporary access points and visibility splays are indicative only at this stage.

As stated in the AIA, ES Volume 3, Appendix 10-1: Arboricultural Impact Assessment and Outline Arboricultural Method Statement [APP-206] removal of trees could be required to achieve the required working corridor widths, space for trenching and permanent easements around the cable to ensure no long-term interference from tree roots. Removal may also be required to achieve temporary access points and visibility splays into the Cable Route Corridor for construction machinery.

Root and canopy impacts along the Cable Route Corridor may occur should the existing access track need to be widened or resurfaced, resulting in potential RPA incursions for open cut sections of the cable route. This will affect ancient woodland, A, B and C category trees, and potentially hedgerows.

Requirements recommended to the Examining Authority to mitigate impact

Should the ExA be minded to recommend approval of this proposal to the SoS then Wiltshire Council would request that the following requirements (conditions) be considered to mitigate the impacts identified above. For the sake of clarity, a full schedule of suggested requirements (conditions) and reasons are included in Appendix B.

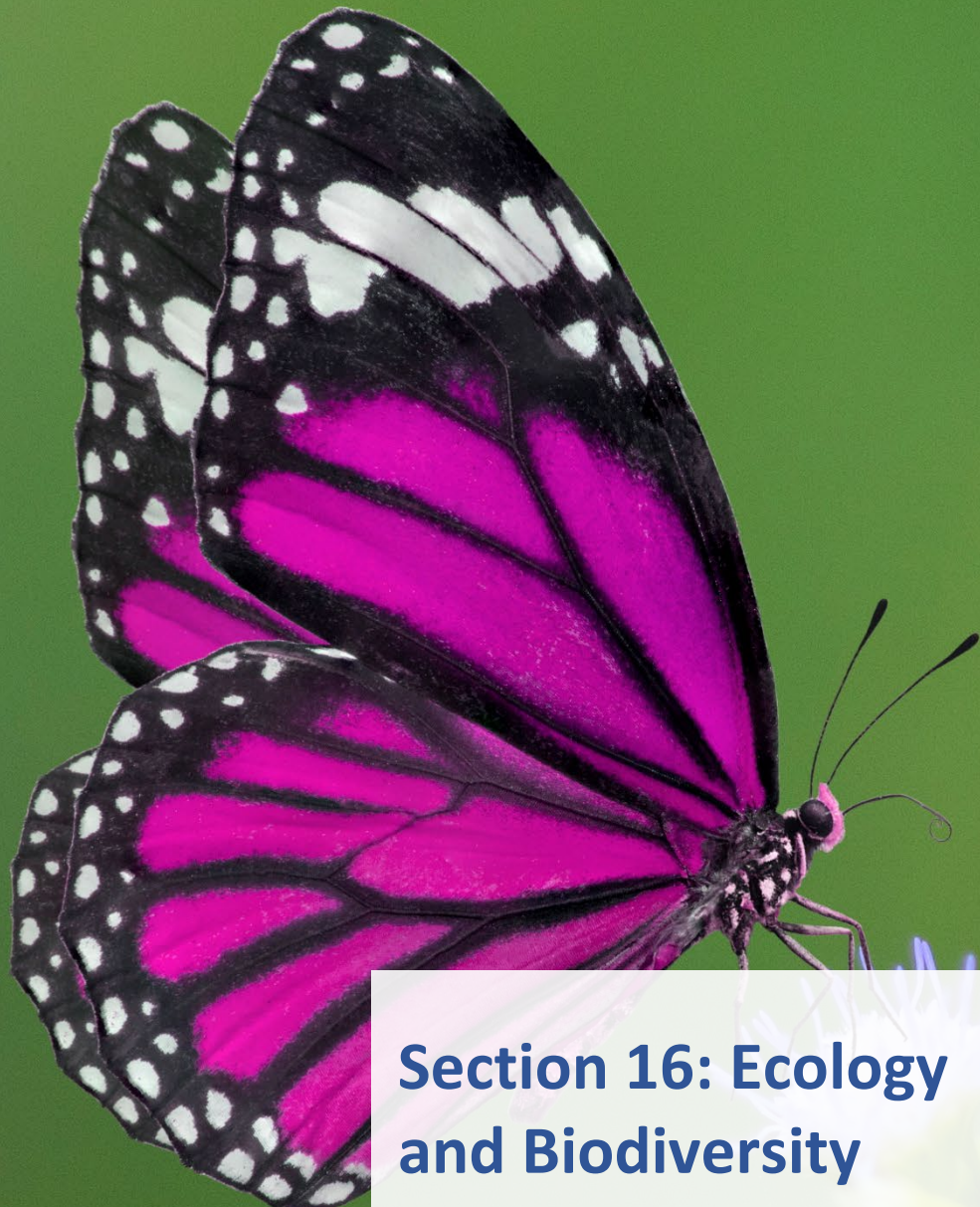
Arboriculture		Requirement to be discharged by:	
Requirement	Reason	Secretary of State	Wiltshire Council
No demolition, site clearance or development shall commence on site, and; no equipment, machinery or materials shall be brought on to site for the purpose of development, until a comprehensive Arboricultural Method Statement, prepared in accordance with British Standard 5837: 2012: "Trees in Relation to Design, Demolition and Construction - Recommendations"; and detailing all methods and materials proposed to be used for tracks, accesses, associated infrastructure, any aspect of the Solar PV Sites, and any aspect of the cable route	The OAMS submitted with the DCO application documentation contained insufficient information to enable this matter to be considered prior to granting consent and the matter is required to be agreed with the Local Planning Authority before development commences in order that the development is undertaken in an acceptable manner, to enable the Local Planning Authority to ensure the retention of trees, groups, woodlands and hedgerows on and off the site in the		Yes

Arboriculture		Requirement to be discharged by:	
Requirement	Reason	Secretary of State	Wiltshire Council
corridor, within, or in the instance of tracks and accesses on the periphery of, the RPA of any tree or group, has been submitted to and approved in writing by the Local Planning Authority.	interests of visual and ecological amenity.		
No demolition, site clearance or development shall commence on site, and; no equipment, machinery or materials shall be brought on to site for the purpose of development, until a comprehensive Arboricultural Method Statement, prepared in accordance with British Standard 5837: 2012: "Trees in Relation to Design, Demolition and Construction - Recommendations"; and detailing all methods and materials proposed to be used for the installation of each BESS, including root barriers for the prevention of leaching of chemicals, has been submitted to and approved in writing by the Local Planning Authority.	The OAMS submitted with the DCO application documentation contained insufficient information to enable this matter to be considered prior to granting consent and the matter is required to be agreed with the Local Planning Authority before development commences in order that the development is undertaken in an acceptable manner, to enable the Local Planning Authority to ensure the retention of trees, groups, woodlands and hedgerows on and off the site in the interests of visual and ecological amenity.		Yes
No demolition, site clearance or development shall commence on site, and; no equipment, machinery or materials shall be brought on to site for the purpose of development, until comprehensive Tree Protection Plans, prepared in accordance with British Standard 5837: 2012: "Trees in Relation to Design, Demolition and Construction - Recommendations"; detailing the locations and types of protective fencing and ground protection proposed, has been	The OAMS submitted with the DCO application documentation contained insufficient information to enable this matter to be considered prior to granting consent and the matter is required to be agreed with the Local Planning Authority before development commences in order that the development is undertaken in an acceptable manner, to enable the Local Planning Authority to ensure the retention of trees, groups,		Yes

Arboriculture		Requirement to be discharged by:	
Requirement	Reason	Secretary of State	Wiltshire Council
<p>submitted to and approved in writing by the Local Planning Authority.</p> <p>The protective fencing shall be erected in accordance with the approved details. The protective fencing shall remain in place for the entire development phase and until all equipment, machinery and surplus materials have been removed from the site. Such fencing shall not be removed or breached during construction operations.</p>	<p>woodlands and hedgerows on and off the site in the interests of visual and ecological amenity.</p>		
<p>No demolition, site clearance or development shall commence on site, and no equipment, machinery or materials shall be brought on to site for the purpose of development, until revised Tree Impacts Plans, prepared in accordance with British Standard 5837: 2012: "Trees in Relation to Design, Demolition and Construction - Recommendations"; labelling all trees, groups, woodlands, and hedgerows within the Order Limits appropriately, and detailing all infrastructure in relation to Lime Down Solar Park, has been submitted to and approved in writing by the Local Planning Authority.</p> <p>(This condition should be added should the plans not be submitted prior to determination)</p>	<p>The Tree Impact Plans submitted with the DCO application documentation demonstrated high-impact construction within the RPA of trees, groups, woodlands, and hedgerows to be retained, without sufficient mitigation to prevent unnecessary harm to said trees, groups, woodlands, and hedgerows. The location and mitigation is required to be agreed with the Local Planning Authority before development commences in order that the development is undertaken in an acceptable manner, to enable the Local Planning Authority to ensure the retention of trees, groups, woodlands and hedgerows on and off the site in the interests of visual and ecological amenity.</p>		<p>Yes</p>

Section 106 Requirements

Arboriculture	Reason (including justification for why a condition is not adequate)
None identified	



**Section 16: Ecology
and Biodiversity**

Note for Examining Authority and Secretary of State

This explanatory note seeks to provide a rationale for the attention and consideration of the Examining Authority (ExA) and Secretary of State (SoS) as to why there is an inconsistency between the impacts discussed within Section 16 of the LIR and the issues discussed within the council's Written Representation, both of which are for submission at Deadline 1 (1 May 2026).

As part of the Applicant's response to Procedural Deadline A on 9 March 2026, a Statutory Biodiversity Net Gain (BNG) Metric [[PDA-008](#)] was submitted to the Planning Inspectorate (PINS) as an unlocked excel spreadsheet given that this had not been provided as part of the application for a Development Consent Order (DCO) submitted to the PINS on Friday 19 September 2025. The submitted Statutory BNG Metric was published on the PINS website on 11 March 2026.

The omission of the Statutory BNG Metric as an unlocked excel spreadsheet from the DCO application and the implications in terms of this preventing a full and proper review of the DCO application, was raised in Wiltshire Council's Relevant Representation [[RR-4934](#)] submitted to PINS on 9 January 2026. The council's Ecology Officer has therefore reviewed this substantive and important recent submission provided at Procedural Deadline A, alongside the extant 7.8 Biodiversity Net Gain Assessment Report [[APP-273](#)] and the remainder of the DCO application to ensure any resulting comments necessary have been incorporated within the council's Written Representation.

Given the substantive new submission at Procedural Deadline A requiring the Ecology Officer's attention and the requirement for any observations arising from this review to be reported in the council's Written Representation within a short timeframe, this has resulted in an unavoidable inconsistency between the content of Section 16 of the LIR and the council's Written Representation. Moreover, it has impeded the council's ability to provide fully comprehensive comments and conclusions within the required timeframes.

This situation has ultimately arisen on account of the late submission of the Statutory BNG Metric in the correct format, which should have been provided at the point of submission of the application for the DCO.

It is anticipated that the discrepancy between the council's LIR and Written Representation will comprise a matter that can be resolved through the Examination process. The council therefore trusts that this note serves as satisfactory explanation for the unavoidable discrepancy between the two documents in light of the short timeframes involved, and that this will not prejudice the ExA's or SoS's consideration of these documents.

Overview and commentary

Wiltshire Council has regulatory responsibility for managing Wiltshire's natural environment. In the Wiltshire Core Strategy (Jan 2015) Policy 50 states development proposals must demonstrate how they protect features of nature conservation as part of the design rationale. There is an expectation that such features shall be retained, sufficiently buffered, and managed favourably to maintain their ecological value, connectivity and functionality in perpetuity. Where it has been demonstrated that such features cannot be retained, removal or damage shall only be acceptable in circumstances where the anticipated ecological impacts have been mitigated as far as possible and appropriate compensatory measures can be secured to ensure no net loss of the local biodiversity resource, and secure the integrity of local ecological networks and provision of ecosystem services.

Whilst it is recognised that BNG is not yet mandatory for nationally significant infrastructure projects (NSIPs) and that the Department for Environment, Food and Rural Affairs (DEFRA) announced on 15 April 2026 that it will implement a mandatory BNG framework for NSIPs from November 2026, the applicant has committed to delivering at least 10% BNG for the Lime Down Solar Park project. Furthermore, it is assumed that the applicant has used the on-site BNG post intervention projections presented in the Biodiversity Net Gain Assessment Report [APP-273] to substantiate and evidence the habitat mitigation, enhancement and creation proposals discussed and relied upon in the DCO application.

The overall impact from habitat loss, fragmentation, severance and land use change of the Lime Down Solar Park proposal is considered to be significantly negative across all phases of the project. Due to the scale of the development, there are concerns regarding substantial loss of, damage to and fragmentation of the established and important network of hedgerows across the Solar PV Sites and the extensive Cable Route Corridor (CRC), where the cabling is to be laid close to field boundaries impacting proposed buffer zones according to 6.1 Environmental Statement Volume 1, Chapter 2 The Order Limits [APP-054]. This would result in the loss of habitats of high intrinsic biodiversity value and of value to protected species, Species of Principal Importance (SPI) and Birds of Conservation Concern (BoCC). The loss of hedgerows and hedgerow trees, as well as other neutral grassland and cattle-grazed pasture within the Solar PV Sites and CRC will result in the long-term loss and fragmentation of habitat used by bats for foraging, commuting and likely for roosting. Loss of farmland and land use change within Solar PV Sites will also lead to substantive loss of breeding bird habitat and displacement of large numbers of birds during the breeding season.

The main impacts of the scheme are summarised in the table below.

Summary of main impacts identified by Wiltshire Council

Ecology and Biodiversity
(1) Summary of main impacts
Positive impacts – construction phase
None identified for the Solar PV Sites at Lime Down Areas A to E or for the Cable Route Corridor (CRC).
Positive impacts – operational
None identified. The applicant may suggest that the Scheme will deliver biodiversity net gain (BNG) during the operational phase and that this will comprise a positive impact. It is acknowledged that BNG is not yet mandatory for NSIPs and that DEFRA postponed the commencement date from November 2025 to May 2026, and then on 15 April 2026 a further update was published, which specified that DEFRA will implement a mandatory BNG framework for NSIPs from November 2026. This proposed commencement date will be post the Examination of the DCO application. Nevertheless, the applicant has committed to ensuring that the Lime Down Solar Park project attains at least 10% BNG. A BNG Assessment Report [APP-273] and Biodiversity Net Gain Assessment Appendix Statutory Biodiversity Metric Calculation [APP-274] was submitted as part of the DCO application. However, APP-274 was not submitted in the requisite form which constitutes an unlocked excel version of the Statutory Biodiversity Metric but instead was submitted as a pdf document with screenshots of pages from the metric. Therefore, the council’s more detailed comments on the BNG submission in the correct format [PDA-008], are contained within the council’s Written Representation, which will also be submitted at Deadline 1. In summary, there are a number of queries and concerns raised by the

council is respect of the submitted Statutory BNG metric and as a result, the council is unable to thoroughly review or verify the metric calculations.

Positive impacts – decommissioning phase

None identified.

Neutral impacts

None identified.

Negative impacts – construction phase

Habitat Loss, Damage and Fragmentation

Hedgerows, Trees and Woodland

Section 9.9 of the 6.1 Environmental Statement Volume 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. Paragraph 3.3.65 of 6.1 Environmental Statement Volume 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 removal of sections of hedgerows as required, e.g. for visibility splays.’*

Nonetheless, Schedule 12 (‘Hedgerows to be Removed’) Part 1 of the 3.1 Draft Development Consent Order [APP-016] comprises a table that lists hedgerows which will be subject to removal work according to the title of Schedule 12 and the ‘Extent of removal’ descriptions specified in column (2) against each of the hedgerows; and Schedule 12 Part 2 comprises a table that extends over numerous pages and lists the important hedgerows which will be subject to removal work according to the title of Schedule 12 and the ‘Extent of removal’ descriptions specified in column (2) against each of the hedgerows.

It is recognised that Part 6 (Miscellaneous and General) of the Draft DCO stipulates in paragraph (4) of Article 40: *‘The undertaker may, for the purposes of the authorised development or in connection with the authorised development and subject to paragraph (2), remove the hedgerows specified in the table in Part 1 and the table in Part 2 of Schedule 12 (hedgerows to be removed) to the extent set out in the landscape and ecological management plan approved pursuant to requirement 7 in Schedule 2 (requirements).’*

Nonetheless, the council is concerned that Schedule 12 Part 1 and 2 appears to list every hedgerow within the Order Limits and that this affords the applicant too much flexibility regardless of the aforementioned stipulation in Part 6. It is therefore possible that the proposed buffers may in actuality afford less protection to the established network of native hedgerows and semi-mature and mature in-hedgerow trees throughout the Solar PV Sites and the CRC than is suggested within the DCO application if the many kilometres of hedgerows, including ‘important hedgerows’ and species-rich hedgerows, listed in Schedule 12 of the Draft DCO are subject to partial removal as is suggested by column (2) of the tables in Part 1 and 2 of Schedule 12. Removal of substantive extents of hedgerow and ‘important hedgerow’, the latter being legally protected by means of the Hedgerow Regulations 1997, has not been wholly assessed in 6.1 Environmental Statement Volume 1, Chapter 9 Ecology and Biodiversity [APP-061]. Instead, the ES has assumed that such removal and tree felling would be minimised with such habitats being largely retained and protected by means of buffers.

The network of hedgerows throughout the Order Limits have intrinsic ecological value and comprise priority habitats / habitats of principal importance (HPI) listed under Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006. The hedgerows and hedgerow trees are also important ecological networks and wildlife corridors that serve a vital function within the landscape for wildlife, including a range of protected species and species of conservation concern (SoCC). Removal of such a considerable extent of hedgerow will therefore have substantive adverse effects on numerous species of fauna that rely on these wildlife corridors for foraging, commuting, roosting, nesting, refuge and hibernation, and will result in habitat fragmentation and loss / reduction of functional habitat connectivity. As such, in accordance with the mitigation hierarchy, hedgerows and hedgerow trees should be retained and protected in accordance with Section 40 of the NERC Act 2006, paragraph 192 clauses (a) and (b) of the National Planning Policy Framework (NPPF) and Core Policy 50 (CP50) of the Wiltshire Core Strategy (WCS).

It is assumed that the proposal to implement buffers from field boundary habitats and other ecological features which is detailed in Section 9.9 of the 6.1 Environmental Statement Volume 1, Chapter 9 Ecology and Biodiversity [APP-061], as aforementioned, also applies to the CRC. However, it is stated in ES 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 APP-061, given that to undertake the works in this way would not permit the implementation of buffers to important ecological features along field boundaries. 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.

In addition, paragraph 3.3.58 of 6.1 Environmental Statement Volume 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 Chapter 9 Ecology and Biodiversity [APP-061]. If so, Wiltshire Council considers that the approach to the cable routing works detailed in ES Chapter 2 The Order Limits [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.

During construction, even with proposed avoidance and mitigation measures in place, there is potential for adverse impacts to ancient woodland which lie directly adjacent to the boundary of the Order Limits, e.g. ancient woodland that is surrounded by Lime Down E and Bincombe Wood bordering Lime Down E and woodland to the immediate north of Lime Down D.

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.

Lowland Calcareous Grassland

In terms of the Solar PV Sites, the council awaits corrected BNG submissions and condition assessments to be able to corroborate Chapter 9 of the ES (please see comments in Written Representation), which indicates that there are no areas of lowland calcareous grassland that qualify as priority habitat / HPI within the Sites. However, there are areas of lowland calcareous grassland priority habitat / HPI immediately adjacent to the Order Limits bordering Lime Down A and Lime Down E. It is possible, given the close proximity of these habitats to the works footprint, that even with mitigation measures in place, the habitats could be adversely affected during the construction phase.

Other Neutral Grassland

The council is concerned about the potential for adverse impacts upon other neutral grassland within the CRC because it is not clear from the ES and baseline report, whether any of the areas of this habitat which will be affected during construction, qualify as priority habitat / HPI. In respect of the CRC, paragraph 3.2.45 of 6.3 Environmental Statement Volume 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.

Paragraph 3.2.46 of 6.3 Environmental Statement Volume 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.**'*

The council considers that the omission of further detail and analysis of the other neutral grassland habitat 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 as being of local importance and must assume that construction could result in loss off and / or degradation to other neutral grassland priority habitat / HPI especially considering that the CRC will be up to approximately 665m wide at some locations along its circa 22km extent.

Arable and Pasture

The loss of farmland within the Solar PV Sites and within the CRC, notably areas of arable, during the construction phase will have an adverse effect on lowland farmland breeding birds, especially ground nesting species such as skylark. Significant areas of breeding habitat equating to a considerable number of territories, will be lost during construction. As the construction progresses, depending on the time of year, ground nesting birds and other species will be subject to disturbance through in increase in noise, human activity and artificial lighting at night and will be displaced as the work progresses and nesting habitat is no longer available.

The CRC is up to 665m in some locations and there is insufficient certainty in terms of the potential for adverse effects on breeding birds as no survey has been undertaken and there has been no habitat survey of 17ha of the CRC area.

Loss and fragmentation of agricultural land within the Solar PV Sites and CRC will also likely have adverse effects on overwintering birds. In respect of the Solar PV Sites, 6.3 Environmental Statement Volume 3, Appendix 9-1 Ecological Baseline Report [APP-198] details that wintering bird surveys have recorded a diverse assemblage of birds, including a moderate diversity of 36 SoCC. However, no wintering bird surveys have been conducted within the CRC and so the potential for effects cannot be fully known.

Areas of cattle-grazed pasture within the Solar PV Sites and the CRC afford foraging habitat for horseshoe bat species, particularly greater horseshoe bats. The installation of solar arrays in areas of this habitat within the Solar PV Sites will reduce suitability for horseshoe bats.

Impacts to cattle-grazed pasture within the CRC would likely adversely affect horseshoe bats, especially if proposed construction compounds which will have external artificial lighting, were to be located close to such habitat, as well as hedgerows. The potential for adverse effects within the CRC is especially significant where approximately 10.5ha of the 4km greater horseshoe bat consultation zone around the Box Mine component of the Bath and Bradford-on-Avon Bats Special Area of Conservation (SAC) coincides with the CRC. It should be assumed that this area comprises land that is functionally linked to the SAC and loss and / or degradation of cattle-grazed pasture within this area would need to be assessed under the Habitats Regulations. It is recognised that paragraph 8.2.3 of the 7.10 Habitats Regulations Assessment (HRA) Report [APP-275] states: *“In order to avoid temporary loss of FLL for greater horseshoe bats, all Temporary Construction Compounds will be sited outside of the Wiltshire Impact Zones for Bat Species. This will be secured as part of the Works Plan (ES Volume 2, 2.3 Works Plan [EN010168/APP/2.3]),...”*

Rivers and Streams

Potential for adverse effects during the construction phase to the river running through Lime Down D and its riparian habitat. This habitat comprises priority habitat / HPI and likely supports a range of wildlife including protected species and SoCC, although there has been relatively limited dedicated survey.

Killing and Injury of Fauna, including Protected Species and SoCC

There is potential for wildlife, including legally protected species, to be injured or even killed across both the Solar PV Sites and the CRC during the construction works, such as when hedgerow removal or tree felling takes place, if adequate avoidance and mitigation isn't implemented. This is a concern for the council, particularly in respect of the CRC given the lack of species-specific survey within the CRC.

The potential for killing of / injury to individuals of the European Protected Species (EPS) great crested newt (GCN) is a particular concern because at present there is no certainty that adequate and appropriate mitigation and compensation will be secured and implemented. 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 C and E. GCN have also been recorded within a further 14 ponds located within 250 m of the Solar PV Sites. However, paragraph 3.3.57 of 6.3 Environmental Statement Volume 3, Appendix 9-1 Ecological Baseline Report [APP-198] specifies that it has not been possible to survey a further 41 ponds within 250 of the Solar PV Sites due to a lack of access permission.

In terms of the CRC, Appendix 9-1 Ecological Baseline Report [APP-198] to the ES specifies that 130 'waterbodies have been identified within the CRC and surrounding 250m. These ponds have not been subject to any survey and the DCO application does not put forward a GCN mitigation strategy for the CRC.' Paragraph 3.3.59 goes on to state: 'District Level Licensing (DLL) 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.'

Although the applicant indicates intention to use Natural England's GCN DLL Scheme in respect of the CRC, the Examining Authority should be aware 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. 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 of the ES [APP-061] specifies that there is intention to apply to use the DLL but does not appear to stipulate that an application has been submitted to date.

Signalling the intention to use NE's DLL Scheme does not in itself provide evidence that sufficient and adequate mitigation and compensation will be implemented to address potential adverse effects on GCN, including the killing of, and injury to, newts. In the absence of an IACPC from Natural England and a mitigation strategy for the CRC, there cannot be certainty of delivery of mitigation to protect GCN and to also compensate for the loss of and impacts to GCN habitat. The Solar PV Sites and the CRC cover a very large area and so this comprises an important issue which clearly should be resolved prior to the approval of the Scheme.

As indicated above, the potential for harm to species of fauna within the Solar PV Sites and CRC during the construction phase is not limited to GCN but this discussion has been provided to serve as a pertinent example.

Disturbance to and Displacement of Fauna, including Protected Species and SoCC

The adverse effects to habitats throughout the Order Limits during the construction phase discussed above will in turn have an adverse effect on species of fauna that utilise and rely on these habitats. Loss, fragmentation and degradation of hedgerows, trees and woodland will have adverse effects on foraging, commuting and roosting bats as well as nesting birds, GCN and other species likely leading to a reduction in use of the habitats by these species, especially when also subject to increased disturbance due to an increase in noise, human activity and artificial lighting. This extends to greater horseshoe bats associated with the Bath and Bradford-on-Avon Bats SAC in respect of the CRC.

Buildings within the Solar PV Sites could support roosting bats and nesting birds. These species groups would potentially be adversely affected during the construction phase as a result of an increase in noise, human activity and lighting / light spill and in turn this could result in displacement / buildings being abandoned by these species groups.

Displacement of ground nesting birds, such as skylark, or overwintering birds will likely occur during the construction phase, depending on the timing of the works due to a reduction in available habitat. Over such a large scale, this could have considerable adverse effects on certain bird species.

Disturbance impacts to riparian protected species of fauna, such as otter, could occur during the construction phase when works take place in proximity to the river that flows through Lime Down D. In respect of otter, adverse effects as a result of disturbance could also occur if otter are using any suitable areas away from but close to the river, for laying up / holts/ dens, such as in pockets of woodland in the vicinity of the river. Riparian species that are legally protected and / or

comprise SPI could also be adversely affected as a result of works in proximity to other watercourses within the Solar PV Sites and CRC.

Negative impacts – operational

Habitat Loss, Damage and Fragmentation

Hedgerows, Trees and Woodland

Where the removal of hedgerow and trees during the construction phase will not be offset by means of new hedgerow planting, ‘gapping up’ of existing hedgerows that were subject to works or tree planting, the adverse effects as a result of loss of this habitat will be long-term for the lifetime of the Scheme or possibly even permanent if replacement habitat is not provided as part of the decommissioning phase. Therefore, impacts on the species that use these habitats which comprise important wildlife corridors and ecological networks, will also continue into and throughout the operational phase on account of habitat loss and fragmentation, for example, removal of considerable extents of hedgerow will loss and severance of linear commuting and foraging habitat for bats. Provision of BNG is not a substitute for the loss of important and established species-rich hedgerows, including ‘important hedgerows’ and hedgerow trees, certainly not in the short to medium term because newly planted hedgerows and trees take considerable time to establish and mature.

There could be some further loss of, and /or damage to hedgerows and trees throughout the operational phase if and when removal or cutting back is necessary to provide new or improved accesses into the Solar PV Sites for the purposes of maintenance and to facilitate access of machinery / vehicles needed to undertake solar array and BESS battery unit replacements. These impacts could also occur within the CRC when maintenance works are required to the cabling.

Modified Grassland Beneath and Around Solar Panels

Throughout the operational phase there will be continued access into and across the whole of the Solar PV Sites for the purposes of maintaining, cleaning and replacing the solar panels and replacing BESS battery units. Given the need to use vehicles and machinery to undertake these works and to traverse alongside the rows of solar panels, this will inevitably disturb the soil, causing compaction, and damage ground flora, especially when the ground is wet. This in turn will reduce the potential for a more diverse assemblage of ground flora to establish and instead species that can survive disturbance are more likely to succeed. For these reasons and on account of shading effects associated with the solar panels, it was specified in the council’s Statutory Consultation response to the PEIR that it should be assumed that only modified grassland of poor condition can be achieved underneath and between the solar panels and that the potential adverse effects associated with the operational activities should be reflected in BNG projections.

The council is yet to provide detailed comments on the 7.8 BNG Assessment Report [[APP-273](#)] and 7.9 Biodiversity Net Gain Assessment Appendix Statutory Biodiversity Metric Calculation [[APP-274](#)] submitted as part of the DCO application because APP-274 was not been submitted in the requisite form (detailed comments are provided in the council’s Written Representation). From an initial review, it is apparent, however, that the need to assume only modified grassland can be attained under and between the solar panels is recognised in the BNG Assessment Report whereas the 6.1 ES Chapter 9 Ecology and Biodiversity [[APP-061](#)] (notably paragraphs 9.12.31 - 9.12.32 relating to additional mitigation for breeding birds) specifies the intention to deliver “...large-scale creation of optimal foraging habitat in the form of diverse grassland types under / between Solar PV Panels and within buffer zones.” Refer to the council’s Relevant Representation [[RR-4934](#)] for further details on this disparity and the implications in terms of the soundness of the assessment conclusions presented in Chapter 9 of the ES.

Regardless of the aforementioned inconsistency between the documents submitted in support of the DCO application, in terms of impacts during the operational phase, it is considered that the maintenance, cleaning and occasional replacement of solar panels will have adverse effects on the diversity, condition and value of the ground flora beneath and around the panels and also potentially upon flora within buffer zones where these are encroached upon by machinery / vehicles as it is deemed likely this will occur to some degree in practice.

Killing and Injury of Fauna, including Protected Species and SoCC

There is a risk that cleaning of and maintenance to solar panels, and maintenance / replacement of cabling within the CRC, as well as the replacement of solar panels and BESS battery units could result in injury to, or even the killing of, species of fauna as a result of use of vehicles and machinery, presumably including tracked machinery, and removal of vegetation. Impacts could also include damage to, or destruction of habitat in the form of, for example, nests, refugia and roosts. Although avoidance and mitigation measures should be implemented during such activities throughout the operational phase to reduce the likelihood of adverse effects occurring, the risk cannot be entirely eliminated.

Disturbance to and Displacement of Fauna, including Protected Species and SoCC

Breeding and Overwintering Birds

Loss of, and changes to habitat across the Solar PV Sites will result in the loss of a large area of breeding habitat for nesting bird species of lowland farmland for the duration of the operational phase. Notwithstanding the comments regarding the breeding bird survey methodology provided in the council's Relevant Representation [\[RR-4934\]](#) on the DCO application, Chapter 9 Ecology and Biodiversity of the ES [\[APP-061\]](#) has attempted to quantify the impacts and estimated the number of skylark territories that will be displaced. 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...*'

Paragraphs 9.12.31-9.12.32 [\[APP-061\]](#) goes on to propose additional mitigation to address the loss of ground nesting bird habitat and displacement of breeding birds, and as discussed above, suggests that diverse grassland habitat can be created under and between the solar panels and within the buffer zones. The council considers this to be unachievable for the reasons detailed above and the council is concerned that assumption of delivery of the additional mitigation for breeding birds proposed in the Ecology and Biodiversity chapter of the ES [\[APP-061\]](#) has skewed the impact assessment, conferring greater assumed benefits than will be delivered on the ground.

Furthermore, in terms of breeding birds, the ES primarily focuses on impacts to ground nesting birds and whilst the council concurs that this does merit considerable attention, it also deems the potential for adverse impacts to birds that nest in hedgerows and trees to likewise be important given the potential for substantive removal of hedgerows across the Order Limits. The council considers the loss of breeding bird habitat, displacement of breeding birds and impacts on bird populations, particularly certain species such as skylark and yellow wagtail, throughout the operational phase to be considerable.

The loss of agricultural land and change of land use within the Solar PV Sites will also likely have adverse effects on overwintering birds during the operational phase that will not be entirely mitigated.

Breeding and overwintering birds may also be subject to disturbance during the operational phase as a result of an increase in noise, human activity and vehicle and machinery use during maintenance and cleaning activities within the Solar PV Sites and CRC. During such activities birds could be flushed and displaced, and this may be temporary with birds returning once activities cease, but it could also be longer term or permanent in some cases.

Bats

The loss of hedgerows and hedgerow trees, as well as other neutral grassland and cattle-grazed pasture within the Solar PV Sites and CRC will result in the long-term loss and fragmentation of habitat used by bats for foraging, commuting and roosting. Severance of commuting and foraging habitat will reduce functional habitat connectivity across the Order Limits but also beyond the Order Limits where existing habitats are contiguous with bat habitat offsite throughout the operational phase. This is a significant concern for the council given the vast scale of the Scheme and the many kilometres of hedgerow which could be removed according to Schedule 12 Part 1 and 2 of the 3.1 Draft DCO [APP-016]. It is also pertinent as approximately 10.5ha of the CRC falls within the 4km greater horseshoe bat consultation zone around the Box Mine component of the Bath and Bradford-on-Avon Bats SAC and this area should be assumed to contain habitat that is functionally linked to the SAC.

Although the 6.1 Environmental Statement Volume 1, Chapter 9 Ecology and Biodiversity [APP-061] assumes that impacts within the CRC will be largely restricted to the construction phase and therefore temporary, and that any removed hedgerows will be reinstated, in order to be suitably precautionary, it should be assumed that some reinstated habitats could take time to establish and fully recover and that therefore adverse effects could continue to be felt into the operational phase. Furthermore, despite the avoidance and mitigation measures proposed, it is conceivable that there will be longer term adverse effects to some habitats within the CRC due to the scale of works and types of activities proposed, such as at the locations where temporary construction compounds will be sited.

In addition, although Chapter 9 of the ES [APP-061] specifies that buffer zones will be implemented, the council nonetheless, considers that there will be impacts on bat populations throughout the operational phase and that there will likely be a reduction in foraging, commuting and also possibly roosting within the Solar PV Sites.

Other Faunal Species

Habitat loss, fragmentation, severance and land use change will likely continue to give rise to adverse effects upon other species of fauna, as well as birds and bats, during the operational phase. In addition, increases in human activity, vehicle and machinery use during operational activities as well as any additional vegetation clearance required to facilitate solar panel and BESS battery unit replacement as well as any works to cabling within the CRC will also lead to adverse effects on a number of other species that currently utilise habitats across the Solar PV Sites and CRC such as GCN, reptiles and otter.

Negative impacts – decommissioning phase

Similar to construction phase, however, insufficient information provided / details known at this stage to facilitate provision of fully informed comments.

Ranking the Ecology and Biodiversity impacts in importance

All the local impacts identified are considered material to the ExA, but in accordance with the national guidance²⁰ the council would indicate the following as the most significant in relation to this theme:

1. According to Schedule 12 Part 1 and 2 of the 3.1 Draft DCO [APP-016], there could be substantial loss of, damage to and fragmentation of the established and important network of hedgerows across the Solar PV Sites and CRC. Across the Order Limits, kilometres of legally protected ‘important hedgerow’, species-rich and ancient hedgerow could be removed to facilitate the Scheme. Refer to the council’s Relevant Representation [RR-4934] to view further discussion and analysis regarding perceived reasons why the applicant has opted to include such extensive lists of hedgerows for removal and how this relates to the ‘Rochdale Envelope’ approach. In summary, it is assumed that the applicant has listed all these hedgerows to provide flexibility and to allow for removal of however much hedgerow it transpires is required at the detailed design stage, with a reliance on use of the ‘Rochdale Envelope’ approach and the need to set out the worst-case scenario to justify the content of Schedule 12. This doesn’t appear to align with the assessment in 6.1 Environmental Statement Volume 1, Chapter 9 Ecology and Biodiversity [APP-061] however, as the assessment doesn’t appear to have been based on the worst-case scenario as represented in Schedule 12, or taken into consideration that such extensive lengths of hedgerow could be removed.

As well as much of the hedgerow network across the Order Limits qualifying as ‘important hedgerow’ under the Hedgerow Regulations 1997, hedgerows comprise priority habitats / HPI. Numerous semi-mature and mature trees also exist within the hedgerows across the Order Limits, a number of which comprise veteran trees and some may also comprise ancient trees. The Scheme could result in loss of these habitats of high intrinsic biodiversity value which also provide important ecological networks and corridors for a range of species including EPS, bats, most likely including Annex II bat species.

It is also evident that there will be encroachment into proposed buffer zones along field boundary hedgerows and trees within the CRC to enable the cabling to be laid close to field boundaries. This will likely lead to damage, degradation and loss / removal of hedgerow and hedgerow trees contrary to what is considered in ES Chapter 9 [APP-061] as the assessment therein assumes that these important habitats within the CRC will be retained and protected in the main.

2. Loss of farmland and land use change within Solar PV Sites leading to substantive loss of breeding bird habitat and displacement of large numbers of birds during the breeding season and associated adverse effects on bird populations, including Birds of Conservation Concern (BoCC) and also possibly Schedule 1 species.
3. Adverse impacts to bats, including Annex II bats, notably greater horseshoe bats functionally linked to the Bath and Bradford-on-Avon Bats SAC, due to habitat loss particularly hedgerows and

²⁰ National Guidance published in 2024, ‘Nationally Significant Infrastructure Projects: Advice for Local Authorities’

hedgerow trees and cattle-grazed pasture and siting of temporary construction compounds which will have artificial lighting, throughout the CRC. It is recognised that the HRA [APP-275] specifies that temporary construction compounds will not be located within the section of the CRC that coincides with the 4km greater horseshoe bat consultation around the Box Mine component of the Bath and Bradford-on-Avon Bats SAC. It is expected that the Scheme will probably result in a reduction in bat foraging, commuting and roosting activity within the Solar PV Sites and potentially also within the CRC. Given that no bat survey has been conducted within the CRC despite a section falling within a greater horseshoe bat consultation zone around a SAC component site and 17ha of land within the CRC has not been subject to habitat survey and the need to apply the precautionary principle, the council cannot at present corroborate the conclusion of the submitted Habitats Regulations Assessment (HRA).

4. Potential for adverse effects upon and damage to ancient woodland within and adjacent to the Order Limits, such as North Bincombe Wood which has been subsumed into the Order Limits boundary since the targeted consultation conducted in June 2025. In turn this would likely lead to adverse effects upon species that use these habitats.
5. Potential for killing of / injury to a number of species and disturbance to and displacement of a number of species including EPS, protected species and SoCC such as GCN and reptiles. In terms of GCN, the DCO application currently lacks a confirmed and demonstrable mitigation strategy for the CRC given that a IACPC from NE has not been submitted alongside the DCO application, and it has not been stipulated whether an IACPC has been attained or whether an application to acquire an IACPC has even been made to date.
6. Potential for adverse impacts upon / loss of other neutral grassland within the CRC given that it is not currently evident from the DCO application documentation, whether any areas of this habitat which will be affected during construction, qualify as priority habitat / HPI. The council is particularly concerned that works within the CRC could result in the loss of and /or damage to other neutral grassland that meets the qualifying criteria for priority habitat / HPI. Insufficient baseline information regarding the other neutral grassland within the CRC has accompanied the DCO application. This is pertinent as the CRC will be up to approximately 665m wide at some locations along its circa 22km extent.
7. Potential for adverse effects upon the river running through Lime Down D and aligning riparian habitat and associated faunal species, such as otter, particularly during the construction phase.
8. Potential for adverse impacts upon lowland calcareous grassland priority habitat / HPI immediately adjacent to the order limits e.g. adjacent to Lime Down A and Lime Down E especially during the construction phase. Although the Scheme boundary has been adjusted to exclude these habitats in the main, the removal of field boundary hedgerow proposed by means of Schedule 12 Parts 1 and 2 of the Draft DCO [APP-016] could leave these adjacent habitats more exposed and vulnerable to damage during construction activities.

Requirements recommended to the Examining Authority to mitigate impact

Should the ExA be minded to recommend approval of this proposal to the SoS then Wiltshire Council would request that the following requirements (conditions) be considered to mitigate the impacts identified above. For the sake of clarity, a full schedule of suggested requirements (conditions) and reasons are included in Appendix B.

Ecology and Biodiversity		Requirement to be discharged by:	
Requirement	Reason	Secretary of State	Wiltshire Council
<p>1. Compliance with Submitted Documents</p> <p>The development will be carried out in <u>strict</u> accordance with the following documents and plans:</p> <ol style="list-style-type: none"> 1. Landscape and Ecology Mitigation Plans (Environmental Statement Volume 2, Figure 3-4-1 to 3-4-5.2). 2. Final Ecological Protection and Mitigation Strategy (EPMS). 3. Hedgerow Removal Plan embedded within and comprising Annex A of the EPMS. 4. Schedule of Protective Ecological Buffers. 5. Habitats Regulations Assessment Report. 6. Final Detailed Landscape and Ecology Management Plan LEMP (LEMP). 7. Final Construction Environmental Management Plan (CEMP). 8. Habitat Management and Monitoring Plan (HMMP). 9. Lighting Strategy (covering construction and operational / maintenance phases). 10. Decommissioning and Restoration Plan / Strategy. <p><i>Note: This is not an exhaustive list and the ExA should include any other technical drawings, and/or relevant sections of reports relating to mitigation they deem appropriate within this DCO requirement if minded to approve the application.</i></p>	<p>For the avoidance of doubt and for the protection, mitigation and enhancement of biodiversity</p>		<p>Yes</p>
<p>2. (Final) Detailed Landscape and Ecology Management Plan LEMP (LEMP)</p> <p>Prior to the start of each phase of construction, a final Landscape and Ecology Management Plan (LEMP)</p>	<p>To ensure the long-term management of landscape and ecological features retained and created by the development, for the</p>		<p>Yes</p>

Ecology and Biodiversity		Requirement to be discharged by:	
Requirement	Reason	Secretary of State	Wiltshire Council
<p>shall be submitted to and approved in writing by the Local Planning Authority. The LEMP will include long term objectives and targets, management responsibilities and maintenance schedules for each ecological feature within the development, together with a mechanism for monitoring success of the management prescriptions, incorporating review and necessary adaptive management in order to attain targets.</p> <p>The LEMP shall be implemented in full and for the lifetime of the development in accordance with the approved details.</p>	<p>benefit of visual amenity and biodiversity for the lifetime of the scheme.</p>		
<p>3. (Final) Construction Environmental Management Plan (CEMP) Prior to the commencement of each phase of the works, including demolition, ground works/excavation, site clearance, vegetation clearance and boundary treatment works, a final Construction Environmental Management Plan (CEMP) shall be submitted to the local planning authority for approval in writing. The CEMP shall provide details of the avoidance, mitigation and protective measures to be implemented before and during the construction phase, including but not necessarily limited to, the following:</p> <p>a. Identification of ecological protection areas/buffer zones and tree root protection areas and details of physical means of protection, e.g. exclusion fencing.</p> <p>b. Working method statements for protected/priority species, such as nesting birds and reptiles.</p> <p>c. Mitigation strategies already agreed with the local planning authority</p>	<p>To ensure adequate protection and mitigation for ecological receptors prior to and during construction, and that works are undertaken in line with current best practice and industry standards and are supervised by a suitably licensed and competent professional ecological consultant where applicable.</p>		<p>Yes</p>

Ecology and Biodiversity		Requirement to be discharged by:	
Requirement	Reason	Secretary of State	Wiltshire Council
<p>prior to determination, such as for great crested newts, dormice or bats; this should comprise the pre-construction/construction related elements of strategies only.</p> <p>d. Schedules for activities with specific timing requirements in order to avoid/reduce potential harm to ecological receptors; including details of when a licensed ecologist and/or ecological clerk of works (ECoW) shall be present on site.</p> <p>e. Key personnel, responsibilities and contact details (including Site Manager and ecologist/ECoW). Development shall be carried out in strict accordance with the approved CEMP.</p>			
<p>4. Biodiversity Net Gain (BNG): Habitat Management and Monitoring Plan (HMMP)</p> <p>Prior to the commencement of each phase of the works, a Habitat Management and Monitoring Plan (the HMMP), prepared in accordance with the statutory Biodiversity Gain Plan and including:</p> <ol style="list-style-type: none"> 1. a non-technical summary; 2. the roles and responsibilities of the people or organisation(s) delivering the HMMP; 3. the planned habitat creation and enhancement works to create or improve habitat to achieve the biodiversity net gain in accordance with the statutory Biodiversity Gain Plan and schedule for implementation; 4. the management measures to maintain habitat in accordance with the statutory Biodiversity Gain Plan for a period of 30 years from the completion of development; and 	<p>To ensure the development delivers a biodiversity net gain on site in accordance with Schedule 7A of the Town and Country Planning Act 1990.</p>		<p>Yes</p>

Ecology and Biodiversity		Requirement to be discharged by:	
Requirement	Reason	Secretary of State	Wiltshire Council
<p>5. the monitoring methodology and specification of a Monitoring Pack (to include but not exclusively up to date Management Actions Logs, Habitat Condition Assessment Reports, metric calculation; and corresponding post intervention Habitat Map) which shall be submitted to the Local Planning Authority in years 2 (two) 5 (five) 10 (ten) 15 (fifteen) 20 (twenty) and 30 (thirty) of the Maintenance Period, has been submitted to, and approved in writing by, the local planning authority.</p> <p>The created and/or enhanced habitat shall be managed and maintained in accordance with the statutory HMMP at all times thereafter.</p>			
<p>5. (Final) Ecological Protection and Mitigation Strategy (EPMS)</p> <p>Prior to the commencement of each phase of the works, a final Ecological Protection and Mitigation Strategy (EPMS) shall be submitted to and approved in writing by the Local Planning Authority.</p> <p>Development shall be carried out in strict accordance with the approved EPMS.</p>	<p>To ensure adequate protection and mitigation for ecological receptors prior to and during construction and operation, and that works are undertaken in line with current best practice and industry standards and are supervised by a suitably licensed and competent professional ecological consultant where applicable.</p>		Yes
<p>6. Lighting Strategy (covering construction and operational / maintenance phases)</p> <p>In relation to the Cable Route Corridor (CRC) where it coincides with the 4km greater horseshoe bat consultation zone around the Box Mine component area of the Bath and Bradford on Avon Bats Special Area of Conservation (SAC). No external light fixture or</p>	<p>To avoid illumination of habitat used by bats.</p>		Yes

Ecology and Biodiversity		Requirement to be discharged by:	
Requirement	Reason	Secretary of State	Wiltshire Council
<p>fitting will be installed within the application site unless details of existing and proposed new lighting have been submitted to and approved by the Local Planning Authority in writing. The submitted details will demonstrate how the proposed lighting will impact on bat habitat compared to the existing situation.</p> <p>The plans will be in accordance with the appropriate Environmental Zone standards set out by the Institution of Lighting Professionals (ILP) Guidance Notes on the Avoidance of Obtrusive Light (GN 01/2021) and Guidance note GN08/23 "Bats and artificial lighting at night", issued by the Bat Conservation Trust and Institution of Lighting Professionals.</p>			
<p>7. Decommissioning and Restoration Plan / Strategy</p> <p>Not later than 12 months before each phase of the planned decommissioning of the solar park a scheme for decommissioning and the restoration of the site must be submitted to the Local Planning Authority and approved in writing. The scheme will be based on update ecological surveys and must make provision for the removal of the solar arrays and the associated above ground structures, equipment and foundations, to a depth of at least one metre below finished ground level. The scheme must include the management and timing of any works; a traffic management plan; an environmental management plan including measures to protect wildlife.</p>	<p>To ensure adequate protection and mitigation for ecological receptors during the decommissioning phase and to ensure compliance with legislation in respect of protected habitats and species, planning policy and best practice</p>		<p>Yes</p>

Section 106 Requirements

Ecology and Biodiversity	Reason (including justification for why a condition is not adequate)
<p>Developer contribution to be secured by means of a S106 for the LPA to monitor the delivery of significant on-site BNG gains over a period of 30 years. The S106 should reflect the HMMP which should set out how it will be monitored and the frequency of reporting from the applicant to the LPA.</p>	<p>The LPA will be responsible for monitoring over the 30 year period.</p> <p><u>Explanatory Note:</u> Calculation of the developer contribution is considered to constitute a matter for the Examination, and potentially for an Issue Specific Hearing, should one be held in relation to ecology and biodiversity.</p> <p>This is because Wiltshire Council’s Schedule of Fees and Charges, which sets out standard fees for monitoring on-site Biodiversity Net Gain, are not applicable to complex, phased developments. Instead, developments of that type necessitate calculation of a bespoke monitoring fee that is index linked and secured by means of a legal agreement.</p> <p>In addition, for complex phased developments delivering significant on-site enhancements the council would prefer submission of a habitat management and monitoring plan (HMMP) with the application in accordance with guidance from DEFRA (Creating a habitat management and monitoring plan for BNG - GOV.UK). The HMMP should provide details that would serve to inform the calculation of the bespoke monitoring fee. This DCO application has not been accompanied by a HMMP, however, and as such it is deemed this matter will need to be resolved through the Examination process.</p> <p>It is therefore considered that to calculate the developer contribution at this juncture, and in advance of advice from the Examining Authority, would be premature</p>
<p>Developer contribution to be secured towards the LPA monitoring the measures set out in the LEMP, which should cover the construction and operational phases.</p>	<p>The LPA will be responsible for monitoring over the lifetime of the Scheme, which is proposed to be at least 60 years.</p> <p><u>Explanatory Note:</u> Calculation of the developer contribution is considered to constitute a matter for the Examination, and potentially for an Issue</p>

Ecology and Biodiversity	Reason (including justification for why a condition is not adequate)
	<p>Specific Hearing, should one be held in relation to ecology and biodiversity.</p> <p>Although Wiltshire Council's Schedule of Fees and Charges stipulates an hourly rate used to calculate developer contributions for the monitoring of habitat and species mitigation delivery, given that the mitigation strategy requirements for this DCO application may be subject to change through the Examination process, it is deemed prudent for the bespoke developer contribution amount to be determined once the mitigation strategies and ecological monitoring matters detailed in the Outline Landscape and Ecological Management Plan [APP-283] have been agreed. The bespoke monitoring fee will need to be index linked and secured by means of a legal agreement.</p> <p>Furthermore, it is considered a matter to be resolved through the Examination on account of there being a number of outstanding issues regarding the Scheme to be addressed through the Examination process, which in turn would facilitate determination of the developer contribution. It is therefore considered that to calculate the developer contribution at this juncture, and in advance of advice from the Examining Authority, would be premature.</p>



**Section 17: Minerals
and Waste**

Overview and commentary

The proposed development has minimal impact on minerals and waste. The cable route crosses safeguarded mineral areas, including Monks Park Mine and a sand and gravel resource zone, but due to shallow trenching and peripheral location, the effect on mineral resources is negligible. No permitted waste sites are affected, and construction waste will be managed through standard practices and the Site Waste Management Plan, with reuse of excavated material under the CL:AIRE DoW CoP framework. Operational waste is negligible, and decommissioning will prioritise reuse and recycling.

The headline issues are safeguarding mineral resources and ensuring sustainable waste management. Recommended requirements include a Construction Environmental Management Plan, Operational Environmental Management Plan, Site Waste Management Plan, and Decommissioning Strategy to secure mitigation and compliance throughout the project lifecycle.

Summary of main impacts

Minerals and Waste
(1) Summary of main impacts
Positive impacts – construction phase
None identified.
Positive impacts – operational
None identified.
Positive impacts – decommissioning phase
None identified.
Neutral impacts
<p>Minerals:</p> <p>The Cable Route Corridor running south from the Solar PV Sites to the National Grid Melksham Substation crosses a Mineral Safeguarding Area identified in the Wiltshire and Swindon Minerals Core Strategy between Corsham and Whitley. The Cable Route Corridor passes over Monks Park Mine, where building stone is mined below ground. However, with the building stone mined at depths of 20+ metres below the surface and the cable trench being no more than 2 metres deep, the impact on the mineral resource would be negligible.</p> <p>The Cable Route Corridor as it approaches the National Grid Melksham Substation affects part of a Mineral Resource Zone identified in the Wiltshire and Swindon Minerals Core Strategy as a suitable area for future sand and gravel supply. However, it is considered that the affected area being small, on the periphery of the mineral deposit and constrained by existing land uses is unlikely to be worked. If in the future the area should be worked for minerals, any remaining cable ducts would not unduly impact on extraction operations.</p> <p>The relevant local planning policies listed in Appendix A (namely, MCS6 of the Minerals Core Strategy and MDC4 of the Minerals Development Control Policies) have been complied with as mineral resources have been safeguarded from unnecessary sterilisation.</p> <p>Waste:</p> <p>No permitted waste management site is impacted by the project boundary.</p>

During the project construction phase standard waste management practices would be implemented to control and manage waste sustainably. The 7.16 Outline Site Waste Management Plan [APP-281] sets out the arrangements that would be employed to reduce waste arisings. Reuse of excavated materials from installation of cabling would be facilitated under the 'CL:AIRE DoW CoP' framework, resulting in less material disposed of by landfill. The submitted assessment of the impact of the waste arising from the project on the capacity of waste management facilities concludes this would be of negligible impact.

During operation, the impacts of waste generation would be minimal, as solar PV panels do not generate any direct waste as part of the energy production process.

The 7.14 Outline Decommissioning Strategy [APP-279] confirms how at the end of the project's operation phase the components would be re-used or recycled to minimise impacts.

The relevant local planning policies listed in Appendix A (namely, WCS6 of the Waste Core Strategy) have been complied with as sufficient regard has been had to minimising and managing waste.

Negative impacts – construction phase

None identified.

Negative impacts – operational

None identified.

Negative impacts – decommissioning phase

None identified.

Ranking the Minerals and Waste impacts in importance

All the local impacts identified are considered material to the ExA, but in accordance with the national guidance²¹ the council would indicate the following as the most significant in relation to this theme:

Minerals:

The impact of the project on identified and safeguarded mineral resources is limited to the Cable Route Corridor which crosses two mineral deposits between Corsham and Whitley. The impact of the grid connection cables on the identified mineral resources is negligible.

Waste:

Waste generated during site preparation and construction would be managed in accordance with relevant regulations and code of practice. Operational impacts would be minimal as solar PV panels do not generate any direct waste as part of the energy production process. At the end of the project's operation the components will be decommissioned and the land restored to its original use and condition.

²¹ National Guidance published in 2024, 'Nationally Significant Infrastructure Projects: Advice for Local Authorities'

Requirements recommended to the Examining Authority to mitigate impact

Should the ExA be minded to recommend approval of this proposal to the SoS then Wiltshire Council would request that the following requirements (conditions) be considered to mitigate the impacts identified above. For the sake of clarity, a full schedule of suggested requirements (conditions) and reasons are included in Appendix B.

Minerals and Waste		Requirement to be discharged by:	
Requirement	Reason	Secretary of State	Wiltshire Council
Construction Environmental Management Plan (CEMP) - As included within the draft DCO [APP-016]	To secure the relevant mitigation measures.		Yes
Operational Environmental Management Plan (OEMP) - As included within the draft DCO [APP-016]	To ensure the sustainable management of waste.		Yes
Site Waste Management Plan (SWMP) - As included within the draft DCO [APP-016]	To ensure waste is managed in accordance with regulatory and good practice requirements.		Yes
Decommissioning Strategy (DS) - As included within the draft DCO [APP-016]	To secure removal of plant and structures at the end of the project.		Yes

Section 106 Requirements

Sec 106 requirement	Reason (including justification for why a condition is not adequate)
None identified.	

Appendix A

Lime Down Solar Park – Local Policy Context

	Fully complies with policy (subject to implementation of requirements identified in this paper)
	Mainly complies with policy on balance (subject to implementation of requirements identified in this paper)
	Conflicts with policy

Plan	Relevant Policy	Comment	Compliance with relevant plan or policy
Wiltshire Core Strategy (January 2015)			
Core Policy 41: Sustainable Construction and Low carbon Energy	<p>Climate change adaptation New development, building conversions, refurbishments and extensions will be encouraged to incorporate design measures to reduce energy demand. Development will be well insulated and designed to take advantage of natural light and heat from the sun and use natural air movement for ventilation, whilst maximising cooling in the summer.</p> <p>Sustainable construction New homes (excluding extensions and conversions) will be required to achieve at least Level 4 (in full) of the Code for Sustainable Homes.</p> <p>Conversions of property to residential use will not be permitted unless Building Research Establishment Environmental Assessment Method's (BREEAM) Homes "Very Good" standards are achieved.</p>	While the Lime Down proposals align with Core Policy 41 in principle through the provision of renewable electricity, there are fundamental shortcomings in carbon performance. The submitted evidence indicates an exceptionally long and potentially unachievable carbon payback period, an overly narrow and methodologically weak assessment of greenhouse gas emissions, and very substantial construction-phase emissions occurring during critical carbon budget periods. The absence of clear evidence demonstrating a credible net carbon benefit, together with reliance on	

Plan	Relevant Policy	Comment	Compliance with relevant plan or policy
	<p>All non-residential development will be required to achieve the relevant BREEAM “Very Good” standards, rising to the relevant BREEAM “Excellent” standards from 2019.</p> <p>Existing buildings</p> <p>Retrofitting measures to improve the energy performance of existing buildings will be encouraged in accordance with the following hierarchy:</p> <ul style="list-style-type: none"> i. Reduce energy consumption through energy efficiency measures ii. Use renewable or low-carbon energy from a local/district source iii. Use building-integrated renewable or lowcarbon technologies. <p>Opportunities should be sought to facilitate carbon reduction through retrofitting at whole street or neighbourhood scales to reduce individual costs, improve viability and support coordinated programmes for improvement.</p>	<p>future mitigation measures, means the proposals fail to meet the substantive requirements of Core Policy 41.</p>	
<p>Core Policy 42: Standalone Renewable Energy Installations</p>	<p>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:</p> <ul style="list-style-type: none"> 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, odour, visual amenity and safety viii. Best and most versatile agricultural land. 	<p>The principle of proposals for renewable energy development receives broad support from Policy CP42 to the Wiltshire Core Strategy, 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. However, compliance with local and national planning policy cannot yet be demonstrated due to</p>	

Plan	Relevant Policy	Comment	Compliance with relevant plan or policy
	Applicants will not be required to justify the overall need for renewable energy development, either in a national or local context.	outstanding information and insufficient mitigation proposals.	
Core Policy 50: Biodiversity and Geodiversity	<p>Protection</p> <p>Development proposals must demonstrate how they protect features of nature conservation and geological value as part of the design rationale. There is an expectation that such features shall be retained, buffered, and managed favourably in order to maintain their ecological value, connectivity and functionality in the long-term. Where it has been demonstrated that such features cannot be retained, removal or damage shall only be acceptable in circumstances where the anticipated ecological impacts have been mitigated as far as possible and appropriate compensatory measures can be secured to ensure no net loss of the local biodiversity resource, and secure the integrity of local ecological networks and provision of ecosystem services.</p> <p>All development proposals shall incorporate appropriate measures to avoid and reduce disturbance of sensitive wildlife species and habitats throughout the lifetime of the development.</p> <p>Any development potentially affecting a Natura 2000 site must provide avoidance measures in accordance with the strategic plans or guidance set out in paragraphs 6.75-6.77 above where possible, otherwise bespoke measures must be provided to demonstrate that the proposals would have no adverse effect upon the Natura 2000 network. Any development that would have an adverse effect on the integrity of a</p>	The proposal fails to demonstrate, as part of the design rationale, the effective protection, retention, buffering and favourable long-term management of biodiversity and geodiversity features. Wiltshire Council considers that mitigation relies heavily on future management plans, does not overcome habitat fragmentation and connectivity harm at landscape scale, and does not deliver demonstrable protection outcomes for the lifetime of the development.	

Plan	Relevant Policy	Comment	Compliance with relevant plan or policy
	<p>European nature conservation site will not be in accordance with the Core Strategy.</p> <p>Biodiversity enhancement</p> <p>All development should seek opportunities to enhance biodiversity. Major development in particular must include measures to deliver biodiversity gains through opportunities to restore, enhance and create valuable habitats, ecological networks and ecosystem services. Such enhancement measures will contribute to the objectives and targets of the Biodiversity Action Plan (BAP) or River Basin/ Catchment Management Plan, particularly through landscape scale projects, and be relevant to the local landscape character.</p> <p>Local sites</p> <p>Sustainable development will avoid direct and indirect impacts upon local sites through sensitive site location and layout, and by maintaining sufficient buffers and ecological connectivity with the wider environment. Damage or disturbance to local sites will generally be unacceptable, other than in exceptional circumstances where it has been demonstrated that such impacts: i. cannot reasonably be avoided ii. are reduced as far as possible iii. are outweighed by other planning considerations in the public interest iv. where appropriate compensation measures can be secured through planning obligations or agreements.</p>		

Plan	Relevant Policy	Comment	Compliance with relevant plan or policy
	Development proposals affecting local sites must make a reasonable contribution to their favourable management in the long-term.		
Core Policy 51: Landscape	<p>Development should protect, conserve and where possible enhance landscape character and must not have a harmful impact upon landscape character, while any negative impacts must be mitigated as far as possible through sensitive design and landscape measures. Proposals should be informed by and sympathetic to the distinctive character areas identified in the relevant Landscape Character Assessment(s) and any other relevant assessments and studies. In particular, proposals will need to demonstrate that the following aspects of landscape character have been conserved and where possible enhanced through sensitive design, landscape mitigation and enhancement measures:</p> <ol style="list-style-type: none"> i. The locally distinctive pattern and species composition of natural features such as trees, hedgerows, woodland, field boundaries, watercourses and waterbodies. ii. The locally distinctive character of settlements and their landscape settings. iii. The separate identity of settlements and the transition between man-made and natural landscapes at the urban fringe. iv. Visually sensitive skylines, soils, geological and topographical features. v. Landscape features of cultural, historic and heritage value. vi. Important views and visual amenity. vii. Tranquillity and the need to protect against intrusion from light pollution, noise, and motion. viii. Landscape functions including places to live, work, relax and recreate. 	<p>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 17 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</p>	

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	<p>ix. Special qualities of Areas of Outstanding Natural Beauty (AONBs) and the New Forest National Park, where great weight will be afforded to conserving and enhancing landscapes and scenic beauty.</p> <p>Proposals for development within or affecting the Areas of Outstanding Natural Beauty (AONBs), New Forest National Park (NFNP) or Stonehenge and Avebury World Heritage Site (WHS) shall 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 AONB that is sufficiently prominent (in terms of its siting or scale) to have an impact on the area's special qualities (as set out in the relevant management plan), must also demonstrate that it would not adversely affect its setting.</p>	<p>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.</p>	
Core Policy 52: Green Infrastructure	<p>Development shall make provision for the retention and 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:</p> <ul style="list-style-type: none"> 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 longterm 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. 	<p>The proposals do not comply because they would fragment and degrade the function, connectivity and multifunctional value of the existing green infrastructure network. Wiltshire Council considers that the scale of the development would harm ecological, landscape and recreational GI functions, and that proposed mitigation and planting measures do not deliver meaningful enhancement or compensate for network fragmentation. Green infrastructure is not protected or strengthened as required by the policy, but instead</p>	

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	<p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p>	<p>reduced to residual mitigation around large-scale infrastructure.</p>	
Core Policy 55: Air Quality	<p>Development proposals, which by virtue of their scale, nature or location are likely to exacerbate existing areas of poor air quality, will need to demonstrate that measures can be taken to effectively mitigate emission levels in order to protect public health, environmental quality and amenity. Mitigation measures should demonstrate how they will make a positive contribution to the aims of the Air Quality Strategy for Wiltshire</p>	<p>The Lime Down proposals comply with Wiltshire Core Strategy Core Policy 55. The development is not located within or adjacent to an Air Quality Management Area, and while construction activities would generate</p>	

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	<p>and where relevant, the Wiltshire Air Quality Action Plan. Mitigation may include:</p> <ul style="list-style-type: none"> i. landscaping, bunding or separation to increase distance from highways and junctions ii. possible traffic management or highway improvements to be agreed with the local authority iii. abatement technology and incorporating site layout/separation and other conditions in site planning iv. traffic routing, site management, site layout and phasing v. where appropriate, contributions will be sought toward the mitigation of the impact a development may have on levels of air pollutants. 	<p>temporary emissions, these are capable of being satisfactorily mitigated through standard construction management measures. Operational impacts on air quality would be negligible, and Wiltshire Council does not identify air quality as a constraint or reason for objection.</p>	
Core Policy 56: Contaminated Land	<p>Development proposals which are likely to be on or adjacent to land which may have been subject to contamination will need to demonstrate that measures can be taken to effectively mitigate the impacts of land contamination on public health, environmental quality, the built environment and amenity.</p> <p>Developers will be required to demonstrate that the development site is, or will be, made suitable for the proposed final use and will need to provide one or more of the following documents:</p> <ul style="list-style-type: none"> i. Detailed site history identifying possibly contaminative uses. ii. Site characterisation: The nature and extent of any contamination and the hazards and risks posed. iii. Detailed remediation scheme: Including methodology and quality assurance. iv. Methodology to report unexpected contamination. 	<p>The development is located on predominantly agricultural land with no identified contamination constraints, and any potential risks arising from construction activities can be appropriately assessed and, where necessary, remediated through standard investigation and mitigation measures. Wiltshire Council does not identify contaminated land as a concern, and the policy's requirements can be satisfied without difficulty.</p>	

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	<p>v. Methodology to ensure verification of remedial works. vi. Details of long term monitoring and maintenance proposals (where necessary).</p> <p>The need for, type and complexity of reports will depend on the specific site.</p>		
Core Policy 57: Ensuring High Quality Design and Place Shaping	<p>A high standard of design is required in all new developments, including extensions, alterations, and changes of use of existing buildings. Development is expected to create a strong sense of place through drawing on the local context and being complementary to the locality. Applications for new development must be accompanied by appropriate information to demonstrate how the proposal will make a positive contribution to the character of Wiltshire through:</p> <ul style="list-style-type: none"> i. enhancing local distinctiveness by responding to the value of the natural and historic environment, relating positively to its landscape setting and the existing pattern of development and responding to local topography by ensuring that important views into, within and out of the site are to be retained and enhanced ii. the retention and enhancement of existing important landscaping and natural features, (e.g. trees, hedges, banks and watercourses), in order to take opportunities to enhance biodiversity, create wildlife and recreational corridors, effectively integrate the development into its setting and to justify and mitigate against any losses that may occur through the development iii. responding positively to the existing townscape and landscape features in terms of building layouts, built form, height, mass, scale, building line, plot size, elevational design, materials, streetscape and rooflines to effectively integrate the building into its setting 	Wiltshire Council considers that the scale, form and cumulative impacts of the development fail to deliver high-quality design or positive place-shaping outcomes. The scheme does not respond appropriately to local context or reinforce landscape and settlement identity, relying instead on mitigation to offset harm rather than embedding design quality within the proposal's structure.	

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	<ul style="list-style-type: none"> iv. being sympathetic to and conserving historic buildings and historic landscapes v. the maximisation of opportunities for sustainable construction techniques, use of renewable energy sources and ensuring buildings and spaces are orientated to gain maximum benefit from sunlight and passive solar energy, in accordance with Core Policy 41 (Sustainable Construction and Low Carbon Energy) vi. making efficient use of land whilst taking account of the characteristics of the site and the local context to deliver an appropriate development which relates effectively to the immediate setting and to the wider character of the area vii. having regard to the compatibility of adjoining buildings and uses, the impact on the amenities of existing occupants, and ensuring that appropriate levels of amenity are achievable within the development itself, including the consideration of privacy, overshadowing, vibration, and pollution (e.g. light intrusion, noise, smoke, fumes, effluent, waste or litter) viii. incorporating measures to reduce any actual or perceived opportunities for crime or antisocial behaviour on the site and in the surrounding area through the creation of visually attractive frontages that have windows and doors located to assist in the informal surveillance of public and shared areas by occupants of the site ix. ensuring that the public realm, including new roads and other rights of way, are designed to create places of character which are legible, safe and accessible in accordance with Core Policy 66 (Strategic Transport Network) 		

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	<ul style="list-style-type: none"> x. the sensitive design of advertisements and signage, which are appropriate and sympathetic to their local setting by means of scale, design, lighting and materials xi. taking account of the needs of potential occupants, through planning for diversity and adaptability, and considering how buildings and space will be used in the immediate and long term future xii. the use of high standards of building materials, finishes and landscaping, including the provision of street furniture and the integration of art and design in the public realm xiii. the case of major developments, ensuring they are accompanied by a detailed design statement and masterplan, which is based on an analysis of the local context and assessment of constraints and opportunities of the site and is informed by a development concept, including clearly stated design principles, which will underpin the character of the new place xiv. meeting the requirements of Core Policy 61 (Transport and New Development) 		
Core Policy 58: Ensuring the Conservation of the Historic Environment	<p>Development should protect, conserve and where possible enhance the historic environment.</p> <p>Designated heritage assets and their settings will be conserved, and where appropriate enhanced in a manner appropriate to their significance, including:</p> <ul style="list-style-type: none"> i. nationally significant archaeological remains ii. World Heritage Sites within and adjacent to Wiltshire iii. buildings and structures of special architectural or historic interest iv. the special character or appearance of conservation areas 	The approach to archaeological assessment and mitigation is mostly complied with, however the evaluation assessments are not complete and the full details of the mitigation has not yet been agreed.	

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	<p>v. historic parks and gardens vi. important landscapes, including registered battlefields and townscapes.</p> <p>Distinctive elements of Wiltshire’s historic environment, including non-designated heritage assets, which contribute to a sense of local character and identity will be conserved, and where possible enhanced. The potential contribution of these heritage assets towards wider social, cultural, economic and environmental benefits will also be utilised where this can be delivered in a sensitive and appropriate manner in accordance with Core Policy 57 (Ensuring High Quality Design and Place Shaping).</p> <p>Heritage assets at risk will be monitored and development proposals that improve their condition will be encouraged. The advice of statutory and local consultees will be sought in consideration of such applications.</p>		
Core Policy 61: Transport and New Development	<p>New development should be located and designed to reduce the need to travel particularly by private car, and to encourage the use of sustainable transport alternatives.</p> <p>As part of a required transport assessment, the following must be demonstrated:</p> <p>i. That consideration has been given to the needs of all transport users, where relevant, according to the following hierarchy:</p> <p>a. Visually impaired and other disabled people b. Pedestrians c. Cyclists</p>	Core Policy 61 is considered to be mainly complied with on balance, subject to the effective implementation of transport mitigation measures. Wiltshire Council raises significant concerns regarding the scale, duration and residual impacts of construction traffic on rural roads and vulnerable users, but does not identify an inherent policy conflict; impacts are	

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	<ul style="list-style-type: none"> d. Public transport e. Goods vehicles f. Powered two-wheelers g. Private cars <ul style="list-style-type: none"> ii. That the proposal is capable of being served by safe access to the highway network. iii. That fit for purpose and safe loading/unloading facilities can be provided where these are required as part of the normal functioning of the development. <p>Where appropriate, contributions will be sought towards sustainable transport improvements, and travel plans will be required to encourage the use of sustainable transport alternatives and more sustainable freight movements.</p>	potentially capable of mitigation in principle.	
Core Policy 62: Development Impacts on the Transport Network	<p>Developments should provide appropriate mitigating measures to offset any adverse impacts on the transport network at both the construction and operational stages.</p> <p>Proposals for new development should not be accessed directly from the national primary route network outside built-up areas, unless an overriding need can be demonstrated.</p>	Core Policy 62 is considered to be mainly complied with on balance. Wiltshire Council raises significant concerns regarding the scale, duration and residual impacts of construction traffic on the transport network, but does not identify an inherent policy conflict; impacts are potentially capable of mitigation in principle, subject to effective implementation.	

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Core Policy 67: Flood Risk	<p>Development proposed in Flood Zones 2 and 3 as identified within the Strategic Flood Risk Assessment will need to refer to the Strategic Housing Land Availability Assessment when providing evidence to the local planning authority in order to apply the sequential test in line with the requirements of national policy and established best practice.</p> <p>All new development will include measures to reduce the rate of rainwater run-off and improve rainwater infiltration to soil and ground (sustainable urban drainage) unless site or environmental conditions make these measures unsuitable.</p>	<p>The development incorporates a number of embedded mitigation measures which, if implemented as proposed, would limit the likelihood and severity of adverse flood risk and water quality effects relative to uncontrolled construction or operation. These include construction-phase drainage controls, operational drainage associated with substations and battery energy storage systems (BESS), and the use of SuDS-based features and sealed drainage with automatic isolation to limit uncontrolled discharges during abnormal events. The scheme would also remove agricultural fertiliser application across the site, reducing nutrient runoff pressures relative to the pre-development baseline. However, notwithstanding these measures, the information submitted does not yet demonstrate that flood risk and drainage effects can be adequately managed across all phases of development. In particular, there remains uncertainty regarding the management of sediment-laden or</p>	

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		hydrocarbon-contaminated runoff during construction, the absence of a defined SuDS retirement strategy at decommissioning, and unresolved matters relating to exceedance routing and long-term drainage performance. Additional evidence gaps relate to the absence of a defined Flood Zone 3b, the potential implications of introducing additional impermeable areas, and the need to demonstrate that controlled discharges would not increase flood risk to receiving watercourses downstream.	
Core Policy 68: Water Resources	<p>Development must not prejudice the delivery of the actions and targets of the relevant River Basin or Catchment Management Plan, and should contribute towards their delivery where possible.</p> <p>Non-residential development will be required to incorporate water efficiency measures. Developers will be expected to submit details of how water efficiency has been taken into account during the design of proposals.</p> <p>Development proposals within a Source Protection Zone, Safeguard Zone or Water Protection Zone must assess any risk to groundwater resources and groundwater quality and</p>	Core Policy 68 is considered to be mainly complied with on balance. Wiltshire Council does not identify water resources as an inherent constraint to development but notes that compliance is contingent on the effective assessment and management of groundwater risks, the implementation of construction-phase pollution controls, and the incorporation of appropriate water-efficiency measures within non-residential elements of the scheme.	

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	demonstrate that these would be protected throughout the construction and operational phases of development.		
Saved Policies of the North Wiltshire Local Plan 2011			
NE12: Woodland	<p>The creation, conservation, enhancement and positive management of woodlands across the district will be supported. In particular, areas of ancient and seminatural woodland should be protected. The retention of the visual amenity and nature conservation value will be sought in particular at the following:</p> <ul style="list-style-type: none"> i. Bird's Marsh Wood, Chippenham ii. Vincient's Wood, Chippenham iii. Pockeredge Drive Wood, Corsham iv. Woodland within Braydon Forest. 	The Lime Down proposals conflict with saved Policy NE12 because they fail to adequately protect the visual amenity, ecological function and setting of ancient and semi-natural woodland, including within the wider Braydon Forest landscape. Wiltshire Council considers that the scale of development and associated disturbance would result in long-term harm that cannot be satisfactorily mitigated or compensated.	
NE14: Trees and the Control of New Development	<p>Permission will not be granted for proposals that would result, or be 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.</p> <p>Planning conditions will be imposed and Tree Preservation Orders made, for safeguarding single and small groups of trees in the interests of public amenity.</p>	The Lime Down proposals conflict with saved Policy NE14 because they would result in the loss and functional degradation of trees and hedgerows that could otherwise be retained and incorporated into the scheme. Wiltshire Council considers that the scale, layout and associated disturbance would harm the amenity and ecological value of these features, contrary to the policy's protective requirements.	

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NE18: Noise and Pollution	Development will only be permitted where it would not generate, or itself be subject to, harm upon public health or cause pollution to the environment by the emission of excessive noise, light intrusion, smoke, fumes, other forms of air pollution, heat, radiation, effluent or vibration.	Saved Policy NE18 is considered to be mainly complied with on balance, as the Lime Down proposals do not give rise to inherent noise or pollution constraints but would generate significant construction-phase impacts that require effective mitigation and control to protect residential amenity.	
T5: Safeguarding	<p>Development affecting public rights of way, cycle and pedestrian routes will only be permitted where satisfactory provision, in terms of safety, attractiveness and convenience, is made to retain or divert the existing or proposed route. Land for the following transport proposals is safeguarded on the proposals map:</p> <ul style="list-style-type: none"> • Chippenham Bus Station • Corsham Railway Station • Cotswold Water Park Eastern Spine Road • Dualling of A350, North of Chippenham • Frogwell to Bumpers Farm Bus only link • Local Transport Plan Cycle Network Plans • Pockeredge Farm, Peel Circus, Local Distributor • Link Road • Purton Railway Station • Spring Quarry Access Road • Swindon and Cricklade Railway • Swindon North Distributor Road 	Policy T5 is considered to be mainly complied with on balance, as the Lime Down proposals do not prejudice safeguarded transport schemes and impacts on public rights of way are capable of mitigation. However, compliance is contingent on the effective implementation of measures to maintain safety, attractiveness and convenience of routes throughout construction and operation.	

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	<ul style="list-style-type: none"> • Thames and Severn Canal • Wilts and Berks Canal • Wootton Bassett Railway Station. 		
Wiltshire and Swindon Minerals Core Strategy 2006-2026 (adopted 2009)			
MCS6: Safeguarding Mineral Resources, Railhead Facilities and Mineral Recycling Facilities	<p>In establishing, monitoring and reviewing Mineral Safeguarding Areas (MSAs) the councils will work with the minerals and waste industries, land owners and other local planning authorities to safeguard the following assets from potential sterilisation by other forms of development:</p> <ul style="list-style-type: none"> • Mineral Resource Zones; • All existing active and dormant minerals sites; • Land within 1km of active and dormant mineral sites; • Sites for future mineral working allocated within DPDs; • Operational land associated with existing and proposed Mineral Recycling Facilities; and • Operational land associated with the existing Rail Aggregate Depot at Wootton Bassett and any proposed new rail-head facilities and sidings. 	The Lime Down proposals are considered to comply with Minerals Core Strategy Policy MCS6 on balance as mineral resources have been safeguarded from unnecessary sterilisation.	
MDC4: Safeguarding Mineral Resources, Railhead Facilities and Mineral Recycling Facilities	<p>Proposals for development within Mineral Safeguarding Areas, as defined on the Proposals Map, that may prevent or adversely affect current or possible future mineral extraction and/or associated ancillary operations, rail-head facilities, and mineral recycling facilities within Wiltshire and Swindon will be opposed unless:</p> <ul style="list-style-type: none"> • An appropriate quantity of mineral can be reasonably extracted prior to or in phase with the proposed non-mineral development 	The Lime Down proposals are considered to comply with Policy MCS6 on balance as mineral resources have been safeguarded from unnecessary sterilisation.	

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	<p>such that the extraction does not unreasonably prevent or hinder the non-minerals development; or</p> <ul style="list-style-type: none"> • It can be proven that the mineral deposit is unlikely to be worked due to its quality or quantity; or • The development is of a temporary nature and can be completed and the site restored to a condition that does not inhibit extraction within the timescale that the mineral is likely to be needed; or • There is an overriding need for the proposed non-minerals development to commence without delay. 		
<p>Wiltshire and Swindon Waste Core Strategy 2006-2026 (adopted 2009)</p>			
<p>WCS6: Waste Reduction and Auditing</p>	<p>Proposals for developments that meet the criteria below will be required to design and provide facilities for occupiers of the development to recycle / compost waste (bring systems) and / or facilities within individual or groups of properties or premises for the source separation and storage of different types of waste for recycling and / or composting.</p> <ul style="list-style-type: none"> • any development providing 10 or more dwelling units; • any new development of shopping centres or facilities where the total gross floorspace amounts to 500 square metres or more; • any development of business, industrial, distribution or storage development where the gross floorspace / increase in gross floorspace amounts to 300 square metres or more; • transport, leisure, recreation, tourist, community, or educational facilities including public car parks and park and ride facilities. <p>Such provision will be expected to have regard to the existing capacity of facilities already available and to the existing Recycling Plan or Municipal</p>	<p>Policy WCS6 is considered to be mainly complied with on balance, as the Lime Down proposals are capable of incorporating appropriate construction and operational waste-reduction, recycling and auditing measures. Compliance is contingent on the provision and implementation of detailed waste audits and management arrangements, but no inherent conflict with the policy is identified.</p>	

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	<p>Waste Management Strategy relevant to the area. Proposals for the developments identified above must also be accompanied by a waste audit, which must include:</p> <ul style="list-style-type: none"> a) the type and volume of waste that the development process will generate (the development process comprises the construction process and any other operations necessary to bring the development into being); b) the steps to be taken to reduce, re-use and recycle any waste that is produced through the development process; c) the steps to be taken to reduce the production of hazardous wastes in the development process; d) the steps to be taken to minimise the use of raw materials in the development process; e) the steps to be taken to reduce the use of hazardous materials in the development process; f) the steps to be taken to minimise the pollution potential of unavoidable waste; g) the steps to be taken to dispose of unavoidable waste in an environmentally acceptable manner; h) the steps to be taken to ensure maximum waste recovery (e.g. recycling and composting) once the development is completed/occupied; and i) proposals for the transport of waste created during the development process and subsequent use of the site. <p>Development proposals outside of the thresholds above will be required to demonstrate that they have had sufficient regard to minimising waste</p>		

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	produced as part of the development process and to the waste hierarchy in identifying a chosen management method for wastes that are produced as part of the development process.		
Neighbourhood Plan Accordance Tables			
Hullavington Neighbourhood Plan 2016 - 2026 (made 2019)			
Policy 1: Settlement Boundary	<p>The settlement boundary is identified in the Proposals Map. Development proposals will be supported WITHIN the settlement boundary, subject to compliance with Policy 3 in the Neighbourhood Development Plan and other relevant policies of the Development Plan.</p> <p>Development proposals OUTSIDE the settlement boundary will be supported where:</p> <ul style="list-style-type: none"> • they are in accordance with the Development Plan Policies in respect of appropriate uses in the countryside; • they relate to necessary utilities infrastructure and where no reasonable alternative location is possible; and • they are in compliance with Policy 3 within this Neighbourhood Development Plan 	The Lime Down proposals include solar array land and associated infrastructure within the Hullavington Neighbourhood Plan area. The Lime Down proposals conflict with Hullavington Neighbourhood Plan Policy 1. The development lies outside the settlement boundary, does not demonstrate that the scale and location of utilities infrastructure is necessary with no reasonable alternative, and fails to comply with Policy 3, which is a prerequisite for support under Policy 1.	
Policy 3: Planning applications in the Parish, apart from Site 690	<p>All proposals for development or redevelopment, where appropriate having regard to the size and scale of the development, will be expected to:</p> <ol style="list-style-type: none"> 1. deliver predominantly 2 and 3 bed properties unless it can be demonstrated through robust, up to date market evidence an 	The Lime Down proposals conflict with Hullavington Neighbourhood Plan Policy 3. The scale and form of the development fail to respect the village's rural landscape and historic	

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	<p>alternative mix is required, including the appropriate number of affordable housing as required by WCS CP43; and ensure that any new affordable housing is allocated in line with Wiltshire Council's Affordable Housing allocation policies and procedures current at the time of any planning application;</p> <ol style="list-style-type: none"> 2. deliver high quality, well designed homes that use traditional external materials, where possible; designed to be in keeping with the historic buildings and layout of the village; referencing the 'Design Concept for Development' Appendix 3. Designs should be locally distinctive reflecting style and scale proportionate to the historic central spine of Hullavington (which can be seen in Fig. 11 on page 7); 3. strongly encourage the incorporation of sustainable design features facilitating accessible and adaptable dwellings; 4. actively support opportunities for maximizing energy efficiency in terms passive and active design approaches to sustainable development; 5. be designed to take account of both: Wiltshire's Landscape Character Assessment and Historic Landscape Characterisation; so as to respect the village's wider rural landscape and historic setting; 7. provide high quality boundary treatments, which reflect the character of the Parish, referring to the 'Design Concept for Development' Appendix 3, using traditional materials, such as dry stonewalling, where possible, to keep the development in context with both the village and wider Parish. Where new green landscaping boundaries are planted, they shall be comprised of native or wildlife enhancing hedgerow species, to encourage biodiversity; 	<p>setting, do not deliver high-quality locally distinctive design, adversely affect green infrastructure, biodiversity and public rights of way, and do not adequately protect residential amenity or address traffic impacts.</p>	

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	<p>8. include landscaping within the development that reflects the traditional, rural context of the village and any new green landscaping shall be of native or wildlife enhancing species, to encourage biodiversity;</p> <p>9. protect and where possible enhance wildlife habitats and corridors, encouraging biodiversity by conserving the network of green infrastructure that contributes towards increasing biodiversity, providing appropriate buffers to existing natural spaces that have community, biodiversity and heritage significance, applicants are encouraged to submit a biodiversity action plan with any application;</p> <p>10. contribute to the provision, extension and maintenance of accessible green space, including green space for sport and children’s play space for the enjoyment of residents, in accordance with Wiltshire Council’s Open Space Standards;</p> <p>11. where possible, retain historic on-site public right of ways within an attractive setting. Any unavoidable loss of quality or extent should be compensated for locally offsite, such that there is no net detriment to the quality or extent of the public right of way network;</p> <p>12. ensure proposals that may impact on a heritage asset, whether designated or non-designated, should be accompanied by an assessment of the significance of the asset and the impact of the proposal upon its significance, using appropriate expertise, where necessary. In the case of a heritage asset with archaeological interest, a desk top assessment should be submitted and, where necessary, a field evaluation carried out;</p>		

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	<p>13. protect the residential amenity of adjoining occupiers; 13. demonstrate that there is adequate parking to meet the current minimum standards and show how the car parking will be integrated within any landscaping scheme for the proposed development so as not to dominate the street scene;</p> <p>14. provide an appropriate level of private external amenity space to include refuse, recycling and cycle storage to ensure a high quality and a well-managed property and streetscape;</p> <p>15. provide accessible pedestrian and cycle connections to the surrounding countryside and village, with particular focus to those who are using a pushchair, wheelchair, walking aid or mobility scooter; and</p> <p>16. demonstrate traffic generation and parking does not adversely affect road and pedestrian safety.</p>		
<p>Sherston Neighbourhood Plan 2006 to 2026 (made 2019)</p>			
<p>Policy 1: Protection of Community Services, Facilities and Business Premises</p>	<p>Facilities, services, shops and local businesses recognised as important to the local community are shown on Maps 5A and 5B and listed below. The loss of community facilities or services, or the change of use of businesses to non- business or non-community uses, will be resisted.</p> <p>Where a change of use that would result in the loss of a community asset or service, or the change of use of a business to a nonbusiness or non-community use is proposed, this should demonstrate why the benefits arising from the proposal outweighs the harm to the community in respect of the loss of a local asset and must be supported by evidence to demonstrate that the existing use of the asset is no longer viable, including at least six months active marketing for an alternative</p>	<p>Policy 1 only applies if a proposal would result in the loss or change of use of specific listed community facilities or businesses. Lime Down does not affect any of those assets, so the policy is complied with and is effectively neutral in decision-making terms.</p>	

Plan	Relevant Policy	Comment	Compliance with relevant plan or policy
	<p>community or business use, taking full account of local market conditions.</p> <p>Facilities/premises to be protected:</p> <ul style="list-style-type: none"> a. Village Hall b. Scout Hut c. British School Room d. The Methodist Chapel e. Carpenter Arms PH f. The Rattlebone PH g. The Angel (hotel and restaurant) h. Grays Garage i. The Old School (shops and offices) j. Tucks k. The Tolsey Surgery l. Apples and Pears m. The Wine Shop n. Stretchline Premises o. Pinkney Park Business Units p. B & W Equine Vets at Willesley 		
<p>Policy 2: Protection of Open Spaces and Open Areas</p>	<p>The Village Hall field, the Recreation Ground and the Allotments, shown on Map 6, are designated as Local Green Space, where new development is ruled out other than in very special circumstances.</p> <p>Development must respect the character and appearance of the land identified on Map 7, at Avon river valleys, Manor Farm and Grove Wood.</p>	<p>The Lime Down proposals do not involve development within any Local Green Space designated on Map 6, nor do they physically extend into the open areas identified on Map 7. Accordingly,</p>	

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		<p>there is no direct loss or encroachment onto land protected by Policy 2. While Policy 2 also requires development to respect the character and appearance of the Map 7 areas, the absence of physical overlap and the separation between the site and those locations means no material harm to their character or appearance has been demonstrated. Wider landscape effects are addressed elsewhere in the assessment.</p>	
<p>Policy 9: Protection of Sports Facilities</p>	<p>The loss of existing open space, sports and recreational buildings and land, including playing fields, will be resisted unless it can be clearly demonstrated that the open space, buildings or land is surplus to requirements; or the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quality and quantity in a suitable location; or the development is for alternative sports and recreation provision, the need for which clearly outweighs the loss.</p>	<p>Policy 9 is complied with, as the Lime Down proposals do not result in the loss of any sports or recreational facilities or land. The policy's tests for resisting loss are therefore not engaged.</p>	
<p>Adopted Malmesbury Neighbourhood Plan (2015) and Draft Neighbourhood Plan (2022)</p>			
<p>Policy 13 (same for both plans)</p>	<p>The Neighbourhood Plan Design Guide as set out in Volume II of this Plan should be taken into consideration in all developments to ensure a high quality of design that respects the specific character of Malmesbury Town and the surrounding area.</p>	<p>The Lime Down proposals conflict with Policy 13 of the Malmesbury Neighbourhood Plan. Although the Lime Down proposals are not within the town itself, their scale, spread and</p>	

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		<p>industrial character would introduce significant change into the surrounding landscape that forms part of Malmesbury's setting. The proposals do not demonstrate how this change would respect the spatial, visual and landscape context identified in the Design Guide.</p> <p>The scale and industrial form of the proposals undermine the objectives of both the adopted and draft neighbourhood plans.</p>	
Joint Melksham Neighbourhood Plan 2 (2025)			
Policy 1: Sustainable Design and Construction	<p>As appropriate to their scale, nature and location, development proposals should demonstrate how they have mitigated and been designed to adapt to the impacts of climate change. This includes:</p> <ol style="list-style-type: none"> a. the submission of a Sustainable Energy Strategy to demonstrate how carbon emissions are minimised, with the target of zero carbon in operation (regulated and unregulated energy); b. embedding the Energy Hierarchy within the design of buildings by prioritising fabric first, orientation, design, and landscaping, to minimise energy demand for heating, lighting, and cooling, as well as maximising renewable energy generation. Proposals should respond positively to opportunities to improve space heating and energy consumption by considering a range of low-carbon and renewable technologies; 	<p>Joint Melksham Neighbourhood Plan 2 Policy 1 is considered to be mainly complied with on balance. The Lime Down proposals include a Sustainable Energy Strategy and deliver zero-carbon electricity generation in operation; however, elements relating to the energy hierarchy, place-based design responses and reduced reliance on private vehicle travel are only partially achieved, given the nature and location of the development.</p>	

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	<ul style="list-style-type: none"> c. demonstrating good connections to existing services and facilities, and/or a mix of uses that minimises the need to travel by private vehicle; d. using carbon sequestration and other sustainable approaches such as shade; and e. the retention of existing buildings where practicable, and the incorporation of associated retrofitting measures to improve the energy performance of existing buildings. 	Compliance is therefore contingent on effective implementation.	
Policy 2: Local Renewable and Low Carbon Energy Generation	<ul style="list-style-type: none"> 1. Proposals for renewable energy, low carbon energy generation projects/developments, and associated infrastructure, including Battery Energy Storage Systems (BESS), will be supported where it can be demonstrated that: <ul style="list-style-type: none"> a. the siting and scale of the proposal is appropriate to its setting; b. the proposal will not result in adverse impacts on the local environment which cannot be satisfactorily mitigated; c. the proposal does not create an unacceptable impact on the amenity and safety; and d. the proposal does not have an unacceptable degree of impact on a feature of natural or biodiversity importance. Proposals for stand alone, ground mounted solar photovoltaic development should demonstrate, where possible that some form of agricultural activity will continue, and/or there are biodiversity improvements around arrays; and, e. the proposal, when taking into consideration other renewable and low carbon energy developments and associated infrastructure in the area, will not result in an unacceptable cumulative impact. 	The Lime Down proposals conflict with Policy 2. Although renewable energy generation and storage are supported in principle, the development fails to demonstrate that its siting and scale are appropriate to the setting, that environmental, amenity and biodiversity impacts can be satisfactorily mitigated, or that cumulative effects are acceptable.	

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	<p>2. Schemes which result in direct benefits to the local community such as energy supplied directly, or financial benefits, will be supported. Proposals for community energy generation projects (with full or partial ownership and/or control by a local community) will be strongly supported. In addition, schemes where the energy produced can be used on or near the generation site/where energy storage is incorporated will be supported. In both cases, proposals should comply with the criteria in the first part of this policy.</p>		
<p>Policy 3: Flood Risk and Natural Flood Management</p>	<p>Natural flood management works to conserve and enhance the ecological flood storage value of the water environment, including watercourse corridors and catchments, will be supported. Development proposals in locations with known flooding issues should include appropriate mitigation and construction methods, and, where appropriate, contributions towards wider catchment projects.</p> <p>As appropriate to their scale, nature and location, development proposals should demonstrate how flood risk is mitigated. This approach should include measures to reduce the amount of rainwater run-off and incorporate Sustainable Drainage Systems.</p>	<p>JMNP2 Policy 3 is considered to be mainly complied with on balance. Within the neighbourhood plan area, the Lime Down proposals are limited to grid-connection infrastructure, which does not result in increased flood risk, incorporates appropriate mitigation and construction practices, and avoids permanent changes to drainage or floodplain function. While the scope does not lend itself to wider catchment-level natural flood management measures, the policy's objectives are met on a proportionate basis subject to implementation controls.</p>	

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Policy 5: Community Engagement	Development proposals should be prepared with early, proactive, proportionate and effective engagement. Developers are therefore encouraged to follow the approach set out in the Melksham Community Engagement Protocol and the Wiltshire Council Statement of Community Involvement.	The scheme has been consulted on in line with statutory requirements and the Council’s Statement of Community Involvement, so Policy 5 is not breached. However, concerns remain locally about how effective that engagement was in shaping the proposals, which means it is best described as mainly complied with on balance rather than fully complied with.	
Policy 11: Sustainable Transport and Active Travel	<p>As appropriate to their scale, nature and location, development proposals should complement the Sustainable Transport Hierarchy, including provision for ultra-low emission vehicles. Proposals for major development should demonstrate through a proportionate Travel Plan how sustainable transport modes are maximised and that safe and suitable movement can be achieved for all people.</p> <p>As a key element in the local sustainable transport network, proposals that would achieve further improvements to the accessibility and quality of the links between the wider town and Melksham railway station will be supported. Improvements to the quality of the public realm around the station will also be supported.</p>	Policy 11 is considered to be mainly complied with on balance. While the Lime Down proposals are constrained by their rural location and cannot deliver broader active-travel or rail-station connectivity benefits, a proportionate Travel Plan and site-specific measures can be implemented to manage travel demand and ensure safe and suitable movement. Compliance is therefore contingent on effective implementation and attracts limited positive weight.	

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Policy 12: Green and Blue Infrastructure	<ol style="list-style-type: none"> 1. Development that will result in the creation of new Green and Blue Infrastructure (GBI) and/or contribute to the protection, management, enhancement and connectivity of existing GBI will be supported; the potential for GBI within the Neighbourhood Area is illustrated diagrammatically in Figure 12. 2. As appropriate to their scale, nature and location, development proposals for major developments must: <ol style="list-style-type: none"> a. identify the existing GBI within and around the development site, and b. demonstrate how GBI has been incorporated into the proposal, and c. assess and address how the proposal will benefit the function and connectivity of GBI through the site and beyond. 	JMNP2 Policy 12 is considered to be mainly complied with on balance. Within the neighbourhood plan area, the Lime Down proposals are limited to grid-connection infrastructure, which identifies existing green and blue infrastructure, avoids permanent impacts on its function or connectivity, and provides for reinstatement following construction. While the scope does not lend itself to significant new GBI creation or enhancement, the policy's objectives are met on a proportionate basis.	
Policy 13: Biodiversity	<p>Development proposals, including those for field based solar farms. will be expected to deliver at least a 10% improvement in biodiversity value within and, where appropriate, beyond the site in order to deliver tangible benefits for biodiversity, including specific attention for protected species. Proposals which deliver a higher Biodiversity Net Gain will be particularly supported.</p> <p>Where appropriate, development proposals should demonstrate sensitive responses to statutory and non-statutory nature conservation sites (as shown on Figure 13), such as accommodating a buffer zone.</p>	JMNP2 Policy 12 (Biodiversity) is considered to be mainly complied with on balance. Within the neighbourhood plan area, the Lime Down proposals are limited to grid-connection infrastructure which avoids permanent habitat loss, addresses protected species through proportionate controls, and provides for reinstatement following construction.	

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		While the scope does not lend itself to significant local biodiversity enhancement, the policy's objectives are met on a proportionate basis.	
Policy 14: Open Spaces	<p>Development proposals that involve the whole or partial loss of an existing open space (other than the designated Local Green Spaces) should demonstrate through an assessment of open space provision, using the quantity and access standards for open space as set out by Wiltshire Council, that:</p> <ul style="list-style-type: none"> a. there is a surplus in the catchment area of open space beyond that required to meet both current and forecast need, and full consideration has been given to all functions that the open space performs, or b. a replacement open space (or enhancement of the remainder of the existing site) provides a net benefit to the community in terms of the quantity, quality and accessibility of the open space including by walking and cycling. 	The Lime Down proposals comply with Joint Melksham Neighbourhood Plan 2 Policy 14, as they do not involve the loss of any existing open space. The policy's assessment and replacement requirements are therefore not engaged.	
Policy 15: Community Facilities	<ul style="list-style-type: none"> 1. Development proposals that involve the loss, in whole or part, of a community facility (as identified in Figure 14a, b & c, and detailed in the Community Facilities Report) must demonstrate that: <ul style="list-style-type: none"> a. adequate alternative provision exists or will be provided in an equally accessible or more accessible location, including by walking and cycling, within the catchment area of the facility; or b. it would not be economically viable, feasible or practicable to retain the building or site for use as a community facility; redevelopment for noncommunity use will only be considered as a last resort and where all other options have been exhausted. 	The Lime Down proposals comply with Joint Melksham Neighbourhood Plan 2 Policy 15, as they do not result in the loss, in whole or part, of any identified community facility. The policy's requirements relating to alternative provision, viability or replacement facilities are therefore not engaged.	

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	<p>2. Proposals for new community facilities in the Plan area will be supported where the applicant can demonstrate the need and benefits of the proposed facility, or where replacement or enhanced facilities are proposed as mitigation against the loss of any community facilities within the Plan area.</p> <p>New or replacement community facilities should be located where there is a choice of travel options and should be accessible to all members of the community.</p>		
Policy 16: Designation of Local Green Spaces	<p>The sites shown on figure 15, and listed on page 95, are designated as Local Green Spaces.</p> <p>Development proposals within the identified LGSs will only be supported in very special circumstances.</p>	The Lime Down proposals comply with Joint Melksham Neighbourhood Plan 2 Policy 16, as they do not involve development within any designated Local Green Space. The policy's restrictive tests are therefore not engaged.	
Policy 17: Trees and Hedgerows	<p>1. Ancient and Veteran Trees:</p> <p>To be supported, development proposals should ensure that there will be no loss or deterioration of the irreplaceable habitats of ancient woodlands (as shown in Figure 12) and ancient or veteran trees found outside ancient woodland, unless the need for and benefits of the development in that location clearly outweigh the loss. In accordance with current guidance a minimum buffer of at least 15 metres in width should be maintained between ancient woodland and any development</p>	Within the neighbourhood plan area, the Lime Down proposals are limited to grid-connection infrastructure which avoids permanent loss or deterioration of trees and hedgerows, applies appropriate protective measures, and provides for reinstatement following construction. While the scope does not allow for a demonstrable net increase	

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	<p>boundary. A buffer zone around an ancient or veteran tree should be at least 15 times larger than the diameter of the tree.</p> <p>2. Other Existing Trees and Hedgerows:</p> <p>To be supported, development proposals should ensure that there is no damage to or loss of trees of good arboricultural and amenity value. Existing trees and hedgerows on development sites should be retained where possible and incorporated as placemaking features in new development. Where there is an unavoidable loss of trees on site, the number and type of replacement trees should be informed by the quality and size of trees lost. Integration of existing hedgerows into private curtilage must be avoided where possible.</p> <p>3. Increased Tree Canopy:</p> <p>Wherever practicable, development proposals on sites outside of the town centre, and greater than 0.5 ha in size, should deliver an increase in site tree canopy cover. This should be demonstrated through a tree planting plan, and should be delivered through the retention of existing trees and /or the planting of new trees in public areas and in private gardens. Where this approach is not practicable, other green infrastructure features (such as green roofs) appropriate to the site should be provided.</p>	<p>in canopy cover locally, the policy's objectives are met on a proportionate basis subject to implementation controls.</p>	
Policy 18: Landscape Character	As appropriate to their scale, nature, and location, development proposals will be expected to:	Within the neighbourhood plan area, the Lime Down proposals are limited to grid-connection infrastructure which	

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	<p>a. integrate natural features such as trees, hedgerows and the local river systems that contribute to both the landscape character and setting of the development;</p> <p>b. demonstrate that the whole scheme, including hard landscape and planting proposals, draws on local landscape characteristics and features through reference to relevant existing landscape and historic landscape assessments, supplemented by any additional site specific assessments, and</p> <p>c. respond sensitively to the transition between settlement edge and countryside and maintain the separate identity of settlements; and conserve or enhance the character, openness, tranquillity and amenity of the open countryside.</p>	<p>avoids permanent change to landscape character, respects settlement edges, and conserves openness and tranquillity following reinstatement. While opportunities for landscape enhancement are limited by the nature of the works, the policy’s objectives are met on a proportionate basis subject to implementation controls.</p>	
<p>Policy 19: Separation of Settlements</p>	<p>Development proposals should respect the separation between the following settlements:</p> <ul style="list-style-type: none"> • Whitley and Shaw; • Shaw and Melksham; • Beanacre and Melksham; and • Berryfield and Semington. <p>Proposals for development between the settlements listed above should:</p> <p>a. be in conformity with development plan policies;</p> <p>b. demonstrate that they would deliver economic, community and/or environmental benefits which would outweigh any harm to the role and function of the area between the two settlements (individually or cumulatively) as set out in section 1 of this policy, and as detailed in the Green Gap and Wedge Study (2023);</p>	<p>Within the neighbourhood plan area, the Lime Down proposals are limited to underground grid-connection infrastructure which does not result in the loss of, or an unacceptable reduction in, the land’s contribution to maintaining separation between settlements. The policy is therefore not engaged</p>	

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	<p>c. minimise and mitigate their urbanising effects, such as artificial lighting and traffic movements; and</p> <p>d. where practicable, retain trees and hedgerows and, as appropriate to their scale and nature, incorporate additional screening trees and hedgerows as edge features to minimise the impact of development on the separation of the settlements concerned.</p> <p>Development proposals which would result in the loss of, or an unacceptable reduction of the contribution which it makes to the separation of the settlements concerned will not be supported.</p>		
Policy 20: Locally Distinctive, High Quality Design	<p>Development proposals should contribute positively to the conservation, enhancement and extension of the quality and local distinctiveness of the neighbourhood area.</p> <p>In addition to having regard to the National Design Guidance and Wiltshire Design Guide, development proposals must demonstrate how they have been informed by the adopted Melksham Design Guidelines and Codes, therefore how they have responded positively to the history and character of the area in which the site is located.</p> <p>Proposals for major development must demonstrate through a masterplan through a Design and Access Statement how the proposed development layout, density, access proposals and building design approach complement and extend the positive characteristics of Melksham and Melksham Without's settlements and landscape, both historic and topographic.</p>	As the works are underground and temporary in the Neighbourhood Plan area, they cannot meaningfully improve local character or create new places. However, they avoid lasting harm and restore the area once complete. Given the limited nature of the works, this is a proportionate and acceptable way of meeting the policy, provided the agreed safeguards are carried out.	

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Policy 21: Local Heritage	<p>Proposals for development within the Melksham Conservation Area must show how they preserve or enhance the setting, characteristics and special qualities that make up the architectural and historic character.</p> <p>For other assets of local heritage importance, including archaeological importance, and buildings or structures identified as Non-designated Heritage Assets (as set out in the 2023 Locally Valued Non-Designated Heritage Asset Report or subsequent updates), mapped on Figure 19 (including notable buildings as shown on Figure 20) development proposals should demonstrate that appropriate consideration has been given to:</p> <ol style="list-style-type: none"> a. the significance of the heritage asset; b. its most distinctive and important features; c. the elements of its setting and immediate surrounds that contribute to its significance, and d. the contribution the asset and its setting makes to the character of the local area (whether in the Conservation Area or not) e. any planning application must not only consider heritage issues but show that they have been fully taken into account via a heritage statement. Archaeological surveys of a particular site may also be required prior to the determination of an application. 	<p>The development does not take place within the Melksham Conservation Area, and appropriate heritage and archaeological assessments have been submitted for locally valued and non-designated heritage assets. These assessments consider asset significance and setting and provide a proportionate framework for further evaluation and mitigation where necessary. On the evidence available, no direct harm to the significance or essential setting of local heritage assets has been demonstrated.</p>	

Plan	Relevant Policy	Comment	Compliance with relevant plan or policy
Chippenham Without Neighbourhood Plan 2022 – 2036 (published 2023)			
Policy CWoNP – HE1	All new development within the Neighbourhood Plan Area must demonstrate good quality design by demonstrating a positive response to the local character of the historic rural landscape.	Within the Chippenham Without NP area, the Lime Down proposals are limited to an underground cable corridor with temporary construction impacts only. No solar arrays, BESS, substations or permanent above-ground infrastructure are proposed. Following reinstatement, there would be no long-term change to the character, openness or historic rural landscape. The proposal therefore demonstrates an appropriate response and does not conflict with Policy CWoNP-HE1.	
Policy CWoNP – HE2	All new developments within the Neighbourhood Plan Area must demonstrate good quality design by responding to the local character of the historic built and natural environment.	The cable corridor avoids permanent alteration to the historic built or natural environment and does not result in lasting harm to the setting of historic assets. Archaeological interest is addressed through proportionate assessment and mitigation. As a result, the proposals preserve historic character in outcome and do not conflict with Policy CWoNP-HE2	

Plan	Relevant Policy	Comment	Compliance with relevant plan or policy
Policy CWoNP – HE3	All new developments should conserve and preserve historic assets in the Parish commensurate with their historic status.	Within the Chippenham Without Neighbourhood Plan area, development is limited to an underground cable corridor with temporary construction impacts only, and there is no permanent harm to historic assets or their settings. Proportionate archaeological assessment and mitigation ensure that heritage interests are conserved in outcome.	
Policy CWoNP – NE1	Where appropriate development proposals must: <ul style="list-style-type: none"> a. Demonstrate how proposals consider the landscape character of Allington, Sheldon and Lanhill including setting and visual impacts. b. Protect existing rights of way and link in new routes to offer the community opportunities for additional countryside access routes and cycleways where possible. c. Include landscape enhancements of appropriate species mix and character. 	Within the Chippenham Without Neighbourhood Plan area, the proposals are limited to an underground electricity cable corridor, with temporary construction works and reinstatement. There are no solar arrays, BESS, substations or permanent above-ground structures within the NP boundary. As a result, no long-term change to landscape character, setting or visual impact on Allington, Sheldon or Lanhill arises following reinstatement. The cable corridor alignment avoids permanently severing public rights of	

Plan	Relevant Policy	Comment	Compliance with relevant plan or policy
		way. Appropriate restoration is proposed using suitable landscape treatments	
Policy CWoNP – NE2	<p>All new development must seek to contribute to sustainable development. Where appropriate, proposals should:</p> <ul style="list-style-type: none"> a. Deliver biodiversity net gains. b. Protect geodiversity where possible. c. Adopt best practice in sustainable urban drainage. 	Policy CWoNP–NE2 is complied with. Within the Chippenham Without Neighbourhood Plan area, the Lime Down proposals are limited to a temporary underground cable corridor with reinstatement, resulting in no lasting harm to biodiversity or geodiversity and adopting proportionate best-practice surface-water management during construction.	
Policy CWoNP – BE3	<p>Development proposals must be of a high quality which respects the Local character, and it must be demonstrated that:</p> <ul style="list-style-type: none"> a. New development is of a scale that is appropriate within both its immediate context as well as the character of the local area. b. Materials used within new developments are appropriate and respond to the local vernacular. c. The form of new development must respect the existing character of the area. d. Designated Heritage Assets and their settings must be thoroughly considered where appropriate. 	Within the Chippenham Without Neighbourhood Plan area, the Lime Down proposals are limited to a temporary underground cable corridor that results in no lasting change to scale, form or materials and preserves the character of the area and the settings of heritage assets following reinstatement.	

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Policy CWoNP – E4	<p>Proposals for community facilities that are of an appropriate scale will be supported. Existing community facilities are as follows:</p> <ul style="list-style-type: none"> • Allington Farm Shop and Café • Texaco Garage and Shop • Chippenham Rugby Club and Allington Cricket Club Golf Driving Range . <p>Any development proposal that would result in the loss of community facilities must clearly demonstrate that the use is not viable. Development proposals which would result in the loss of a community facility but are able to demonstrate that the facility will be replaced in an alternative location within the Neighbourhood Plan Area will be supported.</p>	Policy CWoNP–E4 is complied with, as the Lime Down proposals do not involve the provision of new community facilities and do not result in the loss, relocation, or reduced viability of any existing community facilities identified in the Chippenham Without Neighbourhood Plan. The policy’s protection and replacement tests are therefore not engaged.	
Chippenham Neighbourhood Plan May 2024)			
Policy SCC3 – Standalone Renewable Energy	Proposals for standalone renewable energy developments, including renewable energy storage, will be supported where it can be robustly demonstrated that: 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,	The principle of proposals for renewable energy development receives broad support from policy SCC3 to the Chippenham Neighbourhood Plan, provided that they are suitably located and sufficiently mitigate any adverse development specific and cumulative environmental effects. However, compliance with local and national planning policy cannot yet be demonstrated due to outstanding	

Plan	Relevant Policy	Comment	Compliance with relevant plan or policy
	<p>economic or environmental benefits which benefit the local community over the lifetime of the project are provided; In addition, proposals for ground mounted solar photovoltaic development will be expected to make most effective use of the land around arrays through demonstrating that agricultural use will continue, and/or achieving a minimum of 10% biodiversity net gain on site. Proposals for community energy projects where there is full or partial community ownership involvement will be strongly supported</p>	<p>information and insufficient mitigation proposals.</p>	
<p>Corsham Neighbourhood Plan 2016 - 2026 (made 2019)</p>			
<p>Policy CNP E1</p>	<p>Otherwise acceptable proposals for development which protect and, where possible, enrich the habitat of the protected bat species associated with the Bath and Bradford on Avon Bats Special Area of Conservation (SAC) will be supported.</p> <p>Applicants will need to demonstrate how their proposals would contribute to the delivery of the Corsham Batscape Strategy, including details of measures to preserve and, where possible, enhance wildlife corridors, (especially with regard to foraging areas), priority flight lines and maternity roosts.</p> <p>Proposals that enhance the biodiversity of Corsham will be supported.</p>	<p>No element of the Lime Down proposals lies within the Corsham Neighbourhood Plan area. Neither the solar park nor the associated underground grid connection passes through Corsham parish, and Corsham Neighbourhood Plan policies are therefore not engaged by the development.</p>	
<p>Policy CNP E2</p>	<p>All new development should seek to contribute to the achievement of sustainable development. Proposals should:</p> <ul style="list-style-type: none"> a) Safeguard and, where possible, enhance biodiversity and geodiversity; b) Adopt best practice in sustainable urban drainage; 	<p>As above.</p>	

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	<p>c) Reduce flood risk and ensure that the design and location of new development is resilient to the effects of flooding</p> <p>Proposals are encouraged to demonstrate:</p> <p>d) Innovative design which seeks to achieve low carbon sustainable design;</p> <p>e) The promotion of the efficient use of natural resources, the re-use and recycling of resources, and the production and consumption of renewable energy;</p> <p>f) Grey water re-use; and</p> <p>g) The development of low and zero carbon energy through a range of technologies</p>		
Policy CNP E3	<p>Development proposals should protect, conserve and where possible enhance the special qualities of the Cotswold AONB and the distinctive characteristics of the Landscape Setting of the Corsham Rolling Lowlands. Development should:</p> <p>a) Maintain existing woodland cover and hedge trees wherever possible;</p> <p>b) Restore field boundaries around settlements where there is gapping or degradation wherever possible;</p> <p>c) Demonstrate how the proposal relates to Corsham in terms of landscape, setting and visual effects;</p> <p>d) Create new woodland cover where necessary to mitigate the landscape or visual impact of new development; and</p> <p>e) Protect existing Public Rights of Way and link in new routes to offer local people recreational opportunities in terms of countryside access routes and cycleways.</p>	As above.	

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	All proposed landscaping must be of an appropriate species mix and of local provenance		
Policy CNP E4	Development that results in the loss of green infrastructure identified on Figure 5 (on page 28) or that results in any harm to their character, setting, appearance, general quality or amenity value would only be permitted if, as a minimum, the community would gain equivalent benefit from the provision of suitable replacement green infrastructure.	As above.	
Policy CNP HW1	Development proposals should seek to protect, improve and extend Corsham’s green infrastructure network as identified on Figure 5 (on page 28) to support a healthy community. Innovative proposals that contribute to sustainable pedestrian/cyclist linkages between the town and its rural setting will be supported.	As above.	
Policy CNP HW3	Community green space (including formal and informal sports pitches) identified in Figure 5 (on page 28 and shown in more detail on Maps A1 to A4 in Appendix 2) will be safeguarded and enhanced through new development proposals. Developers must engage with Corsham Town Council at an early opportunity to discuss and potentially secure the long-term management of the open spaces in the public interest.	As above.	
Policy CNP HE1	All new development within the Corsham Neighbourhood Plan Area must demonstrate good quality design. This means responding to and integrating with local surroundings and landscape context as well as the existing built environment. Good design for Corsham means: <ul style="list-style-type: none"> a) Achieving high quality design that respects the scale, character and historic built fabric of existing and surrounding buildings; b) Respecting established building plot arrangements, widths and architectural rhythm of the street scene including front gardens, railings,walls and hedges; 	As above.	

Plan	Relevant Policy	Comment	Compliance with relevant plan or policy
	<p>c) Establishing ‘gateways’ into the town (shown in Figure 10 on page 34) at:</p> <ul style="list-style-type: none"> i. Cross Keys, ii. Pickwick, iii. Pound Pill, <p>to reinforce the identity of the historic centre and enhance the visitor awareness and experience;</p> <p>d) Using good quality materials that complement the existing historic vernacular of Corsham whilst respecting the individual context of each proposal; and</p> <p>e) Taking into account the key views identified in Figures 12 and 13 and ensuring that any development within these views respects the key features of the views.</p> <p>Planning permission will not be granted for development that undermines these core design principles and fails to improve the form and function of the Corsham Neighbourhood Plan Area.</p>		
Policy CNP T1	Development proposals that generate a significant amount of traffic movement must be accompanied by evidence that sets out the transport issues relating to the development including the measures to be taken to deal with the anticipated transport impacts of the scheme. If the impact cannot be satisfactorily mitigated the proposal will be resisted.	As above.	

Appendix B – Consolidated List of Suggested Requirements with Reasons

Socio-Economics, Tourism and Recreation Economic Development		Requirement to be discharged by:	
Requirement	Reason	Secretary of State	Wiltshire Council
No part of the authorised development may commence until a comprehensive business survey recording both positive and negative impacts of the scheme has been agreed with Wiltshire Council.	To direct targeted business support to the right sectors in the local area, and to produce an evidence base for use with other similar sized schemes going forward.		Yes
No part of the authorised development may commence until a business response plan has been submitted to and approved by the relevant planning authority. The business response plan must be implemented as approved.	To ensure agreed plans are in place and ready to be implemented to support local businesses, if needed.		Yes
No battery storage facilities should be installed until Wiltshire Council are satisfied, on advice from Wiltshire and Dorset Fire Service, that fire suppression measures are adequate.	To minimise pollution, minimise impact on businesses and residents should a battery fire occur.		Yes
No part of the scheme should be commenced until a visitor centre providing information on the benefits of the various forms of renewable energy has been approved by Wiltshire Council Economic Development and Development Management teams.	To help encourage local acceptance of the project by; de-mystifying renewable technology, increasing awareness of biodiversity, building trust through school visits, and potentially minimising negative impacts of the scheme on local tourism.		Yes

Archaeology		Requirement to be discharged by:	
Requirement	Reason	Secretary of State	Wiltshire Council
<p>No development shall commence within the area indicated by application until:</p> <p>A Detailed Archaeological Management Strategy (DAMS), setting out a methodology for the excavation and recording of archaeological sites during the construction phase of the development, has been submitted to and approved by the Local Planning Authority. <i>(If such a document has not already become a certified document as part of the application, as is Wiltshire Council's preferred position).</i></p>	<p>To secure an agreed archaeological strategy and methodology in response to impacts upon the archaeological resource from the proposed development.</p>		<p>Yes</p>
<p>No development shall commence within the area indicated by the application until:</p> <p>a) A written programme of archaeological investigation, which should include on-site work and off-site work such as the analysis, publishing and archiving of the results, has been submitted to and approved by the Local Planning Authority; and</p> <p>b) The approved programme of archaeological work has been carried out in accordance with the approved details. This programme is to be completed within 3 years after the completion of on-site archaeological work.</p>	<p>To enable the recording of any matters of archaeological significance.</p>		<p>Yes</p>

Archaeology		Requirement to be discharged by:	
Requirement	Reason	Secretary of State	Wiltshire Council
<p>No development shall commence within the area indicated by application until:</p> <p>a) An Archaeological Management Plan, setting out a methodology for protecting archaeological sites that have been scoped out of the development as well as those within the development footprint that need to be protected during the construction phase of the development, has been submitted to and approved by the Local Planning Authority; and</p> <p>b) The programme of protection has been carried out in accordance with the approved details.</p>	To enable the protection and preservation of sites of archaeological significance.		Yes

Highways – Development Management		Requirement to be discharged by:	
Requirement	Reason	Secretary of State	Wiltshire Council
<p><i>CONDITION - CTMP</i></p> <p>No development shall commence on the specific Lime Down PV sites until detailed Construction Traffic Management Plans (CTMP), together with site plans, have been submitted to, and approved in writing by, the Local Planning Authority. These shall include the following:</p> <ol style="list-style-type: none"> 1. provision for the on-site parking of vehicles for site operatives and visitors. 2. provision for the loading and unloading of plant and materials, including turning areas sufficient for accommodating 	<p>REASON:</p> <p>To minimise detrimental effects to the neighbouring amenities, the amenities of the area in general, detriment to the natural environment through the risks of pollution and dangers to highway safety, during the construction phase.</p>		Yes

Highways – Development Management		Requirement to be discharged by:	
Requirement	Reason	Secretary of State	Wiltshire Council
<p>articulated HGVs and AIL vehicles as required.</p> <ol style="list-style-type: none"> 3. provision for the storage of plant and materials used in constructing the development. 4. the erection and maintenance of security hoarding including decorative displays and facilities for public viewing, where appropriate. 5. locations of wheel washing facilities. 6. measures to control the emission of dust and dirt during construction. 7. a scheme for recycling/disposing of waste resulting from demolition and construction works. 8. measures for the protection of the natural environment. 9. hours of construction, including delivery schedules. 10. traffic routeing signs and HGV turning warning signs (including signage drawing(s)), and associated trimming of vegetation. 11. pre-condition photo surveys (See Informative). 12. details of the proposed highway works proposed in any access route lengths defined as ‘Highway Improvement Areas’ (HIA). <p>NOTE: The proposed extent of the HIA lengths in the draft DCO and potential passage mitigation for two HGVS which might be needed on minor roads outside of this is a point of contention as noted.</p> <p>The development shall not be carried out otherwise than in accordance with the approved construction traffic management plans without the prior written permission of the local planning authority.</p> <p>INFORMATIVE <i>Pre-condition Survey Extents</i> Photographic pre-condition highway surveys are to be carried out for the following lengths of highway with copies of pre and post</p>			

Highways – Development Management		Requirement to be discharged by:	
Requirement	Reason	Secretary of State	Wiltshire Council
<p>condition surveys to be supplied to Wiltshire Council:</p> <ul style="list-style-type: none"> • Lime Down A-C: Alderton Road, Fosse Way and the unnamed road between the Lime Down A access points 5 and 6 and the junction with Fosse Way. • Lime Down D: The route from Dyson Roundabout via Bradfield Cottages to the Lime Down D access points 7, 8 and 20 <p>The applicant should be informed that the Highway Authority will pursue rectification of any defects identified by the highway condition survey which can be attributed to the site construction traffic under the provision of S59 of the Highways Act 1980. As such, the undertaker will be required to enter into a bespoke s59 Agreement with the Highway Authority to formalise arrangements.</p>			
<p><i>CONDITION - Solar PV Sites: Construction Accesses</i></p> <p>No existing or proposed accesses to be used for construction of the Solar PV sites (Lime Down areas A-E) shall be brought into use for such purpose until full details have been submitted to and approved in writing by the Local Planning Authority.</p> <p>These details shall include any proposed re-instatement works where any access or the upgrade works to it is deemed temporary and so needs to be returned to the pre-construction state at the end of the Construction Phase.</p> <p>INFORMATIVE</p> <p>This applies to access references 1-4, 4a, 4b, 5-17, 17a, 17b, 18-21 as shown on 6.2 Environmental Statement Volume 2, Figure 13-11 Construction</p> <p>Access Locations: Solar PV Sites [APP-156]</p>	<p>REASON: In the interests of highway safety.</p>		<p>Yes</p>

Highways – Development Management		Requirement to be discharged by:	
Requirement	Reason	Secretary of State	Wiltshire Council
<p><i>CONDITION - Solar PV Sites: Operational Only Accesses</i></p> <p>None of the additional Operational Only accesses to the Solar PV sites (Lime Down areas A-C and E) shall be brought into use for such purpose until full details have been submitted to and approved in writing by the Local Planning Authority.</p> <p>INFORMATIVE</p> <p>This applies to access references 201-209 as shown on 6.2 Environmental Statement Volume 2, Figure 13-13 Operational Only Access Locations: Solar PV Sites [APP-158].</p>	<p>REASON: In the interests of highway safety.</p>		<p>Yes</p>

Highways - Network Management		Requirement to be discharged by:	
Requirement	Reason	Secretary of State	Wiltshire Council
<p>None identified at this stage due to the expectation that the impacts identified above will be addressed through the inclusion of protective provisions for the benefit of the local highway authority within the draft DCO and through further amendments to the proposed management plans. However, should these negotiations prove unsuccessful, the council reserves the right to seek additional requirements during the examination. Amended provision is required in relation to:</p> <ul style="list-style-type: none"> • The permitting scheme and any possible future Lane Rental Scheme • The Council's network management duties 	<p>To ensure all the normal rules and regulations are in place to protect the highway asset and that coordination with all the normal works across the network are undertaken in the usual thorough way – the council cannot have two sets of different rules for works on its network and must ensure any reinstatements are undertaken to the specified standard to protect the public purse from early failure of trenches.</p>		<p>Yes</p>

Highways - Network Management		Requirement to be discharged by:	
Requirement	Reason	Secretary of State	Wiltshire Council
<ul style="list-style-type: none"> • Adherence to Specification for Reinstatement of Openings of Highways • Adherence to Inspection Code of Practice • Adherence to Section 14 of the Road Traffic Regulation Act 1984 			

Public Rights of Way		Requirement to be discharged by:	
Requirement	Reason	Secretary of State	Wiltshire Council
<p>No part of works may commence until detailed design has been submitted to and approved by the LPA showing all stiles removed from within the red line of Lime Down A,B,C,D and E to be replaced by gates only if livestock is present. The authorised development must be carried out in accordance with the approved details.</p>	Reason: To meet Wiltshire Council's Equalities Act obligations.		Yes
<p>No part of works may commence until detailed design has been submitted to and approved by the LPA showing bridges over natural and man-made water courses to be replaced with more accessible solutions. The authorised development must be carried out in accordance with the approved details.</p>	Reason: To meet Wiltshire Council's Equalities Act obligations.		Yes
<p>No part of works may commence until detailed design has been submitted to and approved by the LPA showing</p>	Reason: To allow easy navigation of the Public Rights of Way network.		Yes

Public Rights of Way		Requirement to be discharged by:	
Requirement	Reason	Secretary of State	Wiltshire Council
waymarking to be installed at any change of direction and entry points where a permissive path or Public Right of Way is located. The authorised development must be carried out in accordance with the approved details.			
No part of works may commence until detailed design has been submitted to and approved by the LPA showing a pre-condition survey is to be carried out of any Public Right of Way or unsealed public highway prior to commencement of the development. The authorised development must be carried out in accordance with the approved details.	Reason: To monitor the surface condition of the PRoW and identify any areas where reinstatement/repair of the surface is required during the life of the development which can be attributed to damage caused by the applicant undertaking activities required for the construction and ongoing maintenance of the solar park as well as its decommissioning.		Yes
No part of works may commence until detailed design has been submitted to and approved by the LPA showing regular passing bays to be provided on any Public Bridleway or unclassified road which is being used by construction traffic. The authorised development must be carried out in accordance with the approved details.	Reason: In the interests of public safety by providing a safe place for more vulnerable users to wait for vehicles to pass and vice versa.		Yes
No part of works may commence until detailed design has been submitted to and approved by the LPA showing bridges over natural watercourses to be upgraded where appropriate.	To address the likelihood of quicker surface water runoff from the proposal to meet Wiltshire Council's Equalities Act obligations.		Yes

Public Rights of Way		Requirement to be discharged by:	
Requirement	Reason	Secretary of State	Wiltshire Council
The authorised development must be carried out in accordance with the approved details.			

Landscape and Visual		Requirement to be discharged by:	
Requirement	Reason	Secretary of State	Wiltshire Council
<p>1. (Final) Landscape and Ecology Mitigation Plan/s</p> <p>(3) No part of the authorised development within Lime Down Areas A, B, C, D or E, or the Cable Route Corridor (CRC) or other areas included within the DCO limits may commence until a Final Landscape and Ecology Mitigation Plan/s has been submitted to and approved in writing by the LPA.</p> <p>(4) The approved Final Landscape and Ecology Mitigation Plan/s shall be submitted to and approved in writing by the LPA prior to any separate application seeking detailed landscape design approval/s for that same area.</p>	<p>The DCO application is submitted under 'Rochdale Envelope' principles and contains insufficient levels of detail, or a final development proposal upon which to base a clearly defined 'Landscape and Ecology Mitigation Plan'. A Final Landscape and Ecology Mitigation Plan is necessary to spatially define the mitigating requirements and principles prescribed within the LVIA and the ecological assessments based on a final development proposal for planning certainty.</p>		Yes
<p>2. Detailed Landscape Design approval</p> <p>(5) No part of the authorised development within Lime Down Areas A, B, C, D or E, or the Cable Route Corridor (CRC) or other areas included within the DCO limits may commence until a Detailed Landscape Design for that area or phased sub-area or CRC or phased section of the</p>	<p>The DCO application is submitted under 'Rochdale Envelope' principles and contains insufficient outline levels of information and/or final development proposal. This matter is required to be agreed with the Local Planning Authority before development commences in order that the</p>		Yes

Landscape and Visual		Requirement to be discharged by:	
Requirement	Reason	Secretary of State	Wiltshire Council
<p>CRC, or other DCO area has been submitted to and approved in writing by the LPA.</p> <p>(6) The Detailed Landscape Design must be consistent with the design principles and parameters, the (Final) approved Landscape and Ecology Mitigation Plans and the (Final) approved LEMP.</p> <p>(7) The Detailed Landscape Design plans shall be prepared at a suitable scale and include:</p> <ul style="list-style-type: none"> • location and current canopy spread of all existing trees and hedgerows on the land; • clearly identify any trees or hedgerows/sections of hedgerow proposed for removal from the land; • full details of any trees and hedgerows to be retained, together with measures for their protection during the course of development; • detailed planting plans and specifications showing all plant species, seed mixes, planting locations, planting and seeding densities, supply provenance, plant stock sizes, and means of protection from livestock grazing and deer / rabbit browsing; • finished levels and contours including for earth bunds identified to be necessary for noise attenuation functions, pollution control, or long-term soil storage for land restoration purposes; • means of enclosure including, fences, gates and security measures; 	<p>development is undertaken in an acceptable manner, to ensure mitigation measures are appropriately designed and specified, that a satisfactory landscaped setting for the development is provided, and existing important landscape /ecological features are adequately protected during the course of development, and to provide a sufficiently detailed landscaping scheme for future monitoring and planning enforcement purposes.</p>		

Landscape and Visual		Requirement to be discharged by:	
Requirement	Reason	Secretary of State	Wiltshire Council
<ul style="list-style-type: none"> • maintenance tracks, service compounds and car park layouts; • other vehicle and pedestrian access and circulation areas, including required highway safety visibility splays; • all hard and soft surfacing materials; • minor artefacts and structures (e.g. signage, refuse and other storage units, signs, lighting, CCTV poles and cameras etc.); • proposed and existing functional services above and below ground (e.g. drainage, power, communications, cables, pipelines, indicating lines, manholes, supports etc.) alongside details of any relevant utility easements that restrict tree planting; • existing and proposed ponds, drainage ditches and other surface water drainage features; • retained historic landscape features (e.g. dry-stone walls, stone styles, etc.) and proposed protection or restoration, where relevant; • Location and heights of screening vegetation acting as visual mitigation identified in the LVIA; • PRow and access enhancements; and • Ecological compensation, mitigation and BNG proposals. <p>(8) The authorised development must be carried out in accordance with the approved Detailed Landscape Design for</p>			

Landscape and Visual		Requirement to be discharged by:	
Requirement	Reason	Secretary of State	Wiltshire Council
each part or phased sub-part of development.			
<p>3. Landscaping to be carried out and maintained</p> <p>(4) All soft landscaping comprised in the approved detailed landscape design shall be implemented in the first planting and seeding season following the commissioning of the development or relevant phase or sub-phase of development unless otherwise agreed in writing with the LPA.</p> <p>(5) All soft landscaping shall be maintained free from weeds and shall be protected from damage by vermin and stock and maintained for a minimum of five years' establishment from completion of each relevant phase or sub-phase. Any trees or plants which die, are removed/missing, or become seriously damaged or diseased shall be replaced in the next planting season with others of a similar size and species, unless otherwise agreed in writing by the LPA.</p> <p>(6) Long term management of the approved detailed landscaping scheme shall be carried out in accordance with the approved final LEMP for the life of development.</p>	<p>To ensure the short-term establishment and long-term management of landscape and ecological features and habitats retained and created by the development, for the benefit of visual amenity and biodiversity for the lifetime of the scheme.</p>		Yes
<p>4. (Final) Landscape and Ecological Management Plan (LEMP)</p> <p>(4) No part of the authorised development may commence until a Final LEMP for the whole</p>	<p>The DCO application is submitted under 'Rochdale Envelope' principles and the outline LEMP is not based on a final development proposal. This</p>		Yes

Landscape and Visual		Requirement to be discharged by:	
Requirement	Reason	Secretary of State	Wiltshire Council
<p>of the DCO order limits has been submitted to and approved in writing by the LPA. This shall include detailed landscape and ecological management recommendations and monitoring for each of the Lime Down Areas A, B, C, D, E and the CRC.</p> <p>(5) The final LEMP must be substantially in accordance with the Outline LEMP and include:</p> <ul style="list-style-type: none"> • objectives and management prescriptions for each habitat and feature during construction, operation and decommissioning. • success criteria, monitoring methods and frequencies, and triggers for remedial measures; [Monitoring must record survival rates, canopy cover, hedgerow structure, sward composition, habitat condition and any failures against the success criteria in the final LEMP]. • governance, competencies and responsibilities, including appointment of an Ecological Clerk of Works during construction; • budget and resourcing for the operational life of the development; • data management and reporting protocols; and • arrangements for co-ordination with any BNG Management and Monitoring Plan required as separate requirement(s). • objectives and management prescriptions to achieve embedded landscape enhancement and visual 	<p>matter is required to be agreed with the Local Planning Authority before development commences to ensure landscape and ecological features retained and created by the development, are appropriately established, and maintained to deliver the embedded mitigation and enhancement measures for visual amenity and biodiversity for the operational lifetime of the development.</p>		

Landscape and Visual		Requirement to be discharged by:	
Requirement	Reason	Secretary of State	Wiltshire Council
<p>screening measures identified within the LVIA for landscape and visual mitigation purposes.</p> <ul style="list-style-type: none"> appropriately scaled supporting plans to illustrate the spatial arrangement and location of each habitat or feature to be managed with clear cross reference to final LEMP management objectives and prescriptions. <p>(6) The undertaker must undertake landscape and habitat condition monitoring in years 1, 2, 3, 5 and 10, and at five-year intervals thereafter for the duration of the authorised development. Where monitoring indicates success criteria are not met, adaptive management measures must be implemented within six months, with any remedial actions agreed with the LPA.</p> <p>(7) A Landscape Monitoring Report must be submitted to the LPA within three months of each monitoring year.</p> <p>(8) The authorised development must be carried out and maintained in accordance with the approved Final LEMP and shall be implemented in full and for the lifetime of the development in accordance with the approved details or any necessary subsequent adaptive management measures agreed in writing with the LPA.</p>			
<p>5. (Final) Soil Resource and Management Plan</p>	<p>The necessary level of required detail is not provided within 7.15</p>		<p>Yes</p>

Landscape and Visual		Requirement to be discharged by:	
Requirement	Reason	Secretary of State	Wiltshire Council
<p>4) No part of the authorised development may commence until a final Soil Resource and Management Plan (SRMP) has been submitted to and approved in writing by the LPA. The Final SRMP must be substantially in accordance with the Outline SRMP.</p> <p>5) The plan must set out methodologies for soil stripping, soil handling - including compaction avoidance, separation of topsoil from subsoil, soil storage details (including maximum storage heights and locations for temporary and long-term storage for future land restoration at decommissioning stage).</p> <p>6) The authorised development must be carried out in accordance with the final approved Soil Resource and Management Plan.</p>	<p>Outline Soil Resources Management Plan [APP-280].</p> <p>The final detailed SRMP is required to safeguard and sustainably manage all on-site soil resources in accordance with recognised current best practice, to ensure soil health and condition is maintained or improved during the development phases and demonstrate that the reinstatement of land back to baseline agricultural values or agreed agri-environment uses following decommissioning is achievable.</p>		
<p>6. Arboricultural method statement(s) and tree protection</p> <p>These are highlighted to be necessary, but it is understood the Council's tree officer(s) have already provided the technical requirements and reasons for these.</p>			Yes
<p>7. Glint and glare assessment and mitigation</p> <p>(4) No part of the authorised development may commence until a Glint and Glare Assessment, and any associated mitigation plan have been</p>	<p>The application does not provide a final detailed scheme layout. This condition is necessary to ensure that no unacceptably harmful glint and glare effects will arise from the final design and</p>		Yes

Landscape and Visual		Requirement to be discharged by:	
Requirement	Reason	Secretary of State	Wiltshire Council
<p>submitted to and approved in writing by the LPA.</p> <p>(5) The assessment and mitigation must consider residential receptors, highways, PRoW and aviation receptors and address panel finishes, layout/orientation, finished levels and effectiveness of vegetative screening.</p> <p>(6) The authorised development must be carried out in accordance with the approved mitigation plan.</p>	<p>layout of solar PV panel arrays and areas, or where adverse effects are identified for specific visual receptors that impacts can be acceptably mitigated.</p>		
<p>8. (Final) Public Rights of Way and Access Enhancement Plan</p> <p>(5) No part of the authorised development may commence until a final PRoW and Access Enhancement Plan has been submitted to and approved in writing by the LPA.</p> <p>(6) The plan must identify diversions, improvements, surfacing, gates, viewpoints and interpretation, and demonstrate how opportunities to enhance PRoW and public access have been maximised through design and layout.</p> <p>(7) The PRoW and Access Enhancement Plan must be implemented before operation of the first arrays in the relevant part, unless otherwise agreed in writing by the LPA.</p>	<p>To ensure that Public Rights of Way are appropriately managed during all stages of development and that opportunities to enhance public access are identified and implemented to help achieve objectives of sustainable development.</p>		Yes
<p>9. Community access, interpretation and PRoW condition</p>	<p>To ensure that Public Rights of Way are appropriately managed during all stages of development and that</p>		Yes

Landscape and Visual		Requirement to be discharged by:	
Requirement	Reason	Secretary of State	Wiltshire Council
(3) Prior to operation of the first arrays, the undertaker must install interpretation boards, viewpoints and wayfinding in locations identified in the PRow and Access Enhancement Plan and maintain them in good repair for the duration of the authorised development.	opportunities to enhance public access are identified and implemented to help achieve objectives of sustainable development.		
(4) Annual PRow condition checks must be included within the Landscape Monitoring Report.			
10. Construction Environmental Management Plan (CEMP): Landscape and Ecology			
(4) No part of the authorised development may commence until a CEMP: Landscape and Ecology has been submitted to and approved in writing by the LPA.			
(5) The CEMP: Landscape and Ecology must include: g) roles and responsibilities, including Ecological Clerk of Works (ECoW) oversight and toolbox talks; h) protective fencing and buffer zones for retained habitats and trees; i) invasive non-native species control measures; j) dust, noise and lighting controls; k) soil and water management; and l) temporary landscape works and early planting measures to achieve screening.	To ensure important landscape features and ecological habitats are appropriately protected from construction activities and temporary works during development.		Yes
(6) The authorised development must be carried out in			

Landscape and Visual		Requirement to be discharged by:	
Requirement	Reason	Secretary of State	Wiltshire Council
accordance with the approved CEMP: Landscape and Ecology.			
<p>11. Landscape Phasing and early establishment</p> <p>(4) No part of the authorised development may commence until a Landscape Phasing Plan has been submitted to and approved in writing by the LPA.</p> <p>(5) The Phasing Plan must provide for advance planting and habitat creation to be undertaken at the earliest practicable stage for priority receptor groups identified in the LVIA and coordinate with grid connection works.</p> <p>(6) Planting and habitat creation in each phase must be implemented in the first planting season following completion of construction works in that phase.</p>	To ensure timely and co-ordinated delivery of embedded landscape and visual, and ecological mitigation proposals at the earliest opportunity.		Yes
<p>12. Design change control</p> <p>(3) The authorised development must be carried out in accordance with the design principles and parameters; any material departure requires approval of the relevant planning authority accompanied by an addendum assessing any change in landscape and visual effects.</p> <p>(4) A Design Commitments Register must be maintained for examination and post consent governance and made available to the relevant planning authority on request.</p>	The DCO application is submitted under 'Rochdale Envelope' principles and is subject to change, during the course and lead up to examination. The assessment of landscape and visual effects should be based on up to date and worse case development scenarios to inform planning judgements, and future governance and enforcement actions.		Yes

Landscape and Visual		Requirement to be discharged by:	
Requirement	Reason	Secretary of State	Wiltshire Council
<p>13. Lighting</p> <p>(4) Prior to operation of any part of the authorised development, a Lighting Strategy must be submitted to and approved in writing by the LPA.</p> <p>(5) The Lighting Strategy must minimise artificial light spill and avoid upward light spill, use downward directed, motion activated luminaires where practicable, to protect integrity of existing dark corridors for wildlife, and to conserve the intrinsic dark skies special quality of the Cotswold National Landscape.</p> <p>(6) The authorised development must be operated in accordance with the approved Lighting Strategy.</p>	<p>To mitigate as far as practicable against all unnecessary effects of artificial light pollution associated with the development, to protect important dark corridors for wildlife, and to safeguard the dark skies 'special quality' of the Cotswold National Landscape.</p>		<p>Yes</p>
<p>14. BNG delivery and monitoring (NSIP regime)</p> <p>(4) Where the statutory BNG regime for NSIPs is in force, the undertaker must achieve and maintain the biodiversity gain objective across the order limits or via registered off-site biodiversity units or statutory credits, calculated with the applicable statutory biodiversity metric.</p> <p>(5) Habitats created for the purpose of achieving BNG must be managed for the duration of development.</p> <p>(6) A BNG Management and Monitoring Plan must be</p>	<p>To ensure the development contributes towards nature recovery targets and delivers sustainable development.</p>		<p>Yes</p>

Landscape and Visual		Requirement to be discharged by:	
Requirement	Reason	Secretary of State	Wiltshire Council
<p>submitted to and approved prior to operation of the authorised development and must include annual reporting to the relevant planning authority and, where applicable, updates to any national register.</p> <p>(8) Where irreplaceable habitat is affected, bespoke compensation must be delivered in accordance with the applicable policy framework.</p>			
<p>15. Vegetation management beneath arrays</p> <p>(4) Prior to operation of any part of the authorised development, a Vegetation Management Plan for that part must be submitted to and approved in writing by the LPA.</p> <p>(5) The plan must set out mowing/topping regimes, compatible sheep grazing prescriptions (including stocking densities and exclusion periods), and no spray buffer zones adjacent to hedgerows and watercourses.</p> <p>(6) The authorised development must be operated in accordance with the approved Vegetation Management Plan.</p>	<p>It is not clear from the information submitted to date how the grassland/vegetation (both existing and proposed) located beneath solar panel areas will be managed, to achieve the landscape and ecological benefits stated.</p>		Yes
<p>16. Invasive non-native species</p> <p>(3) The undertaker must prepare and implement an Invasive Non-Native Species Management Plan for the order limits covering construction and operation, including surveillance, treatment and biosecurity measures.</p>	<p>To safeguard the integrity of existing native habitats and species present across the large site areas.</p>		Yes

Landscape and Visual		Requirement to be discharged by:	
Requirement	Reason	Secretary of State	Wiltshire Council
(4) The plan must be submitted to and approved in writing by the LPA before commencement.			
<p>17. Decommissioning and restoration</p> <p>(5) Not less than 12 months before cessation of renewable energy generation within any part of the authorised development, the undertaker must submit a Decommissioning and Restoration Plan (DRP) for that part to the LPA for approval in writing.</p> <p>(6) The DRP should include details of planned sequenced phased removal of all renewable energy infrastructure components from the land, and phased restoration of all DCO farmland back to baseline condition(s).</p> <p>(7) The DRP must provide for:</p> <ul style="list-style-type: none"> removal of panels, BESS, all structures, fencing, maintenance tracks and hardstanding's and underground infrastructure where it can be achieved without undue environmental harm. soil reinstatement and restoration to agricultural use compatible with baseline land capability or retention/transition of successful habitats where agreed; measures to prevent introduction or spreading of any non-native species during all decommissioning and restoration activities. 	To ensure that following the cessation of temporary long-term renewable energy use, all development will be removed from the land and the land restored back to productive farming, or other agreed agri-environment use(s), necessary for planning certainty.		Yes

Landscape and Visual		Requirement to be discharged by:	
Requirement	Reason	Secretary of State	Wiltshire Council
<ul style="list-style-type: none"> • restoration and re-planting of hedgerows where these were removed to facilitate either construction access or operational maintenance accesses, or additionally required for removal. • to facilitate the removal of energy infrastructure and maintenance tracks as part of decommissioning works. • removal of highway improvement areas/HGV passing places, and restoration back to rural highway verges, unless otherwise agreed in writing with the LPA. • retention of PRoW enhancements where agreed; and • details of post restoration monitoring arrangements for a period of five years. <p>(8) Decommissioning must be completed within 24 months of cessation of energy generation, storage or transfer, unless otherwise agreed in writing by the LPA.</p>			

Built Heritage		Requirement to be discharged by:	
Requirement	Reason	Secretary of State	Wiltshire Council
<p>Prior to the commencement of works in respect of Lime Down E, design details for the highway improvement works to the site access track from the South West of Rodbourne (which shall include details for mitigation of impact on the character and appearance of the conservation area) shall be submitted to and approved in writing by the LPA. The detailed design must be implemented as approved.</p> <p>Alternatively, details for the reinstatement of the track following the construction phase could be conditioned.</p>	<p>To secure appropriate mitigation of the heritage impact resulting from the upgrading of the construction access to Site E on the character and appearance of Rodbourne Conservation Area.</p>		<p>Yes</p>

Public Health		Requirement to be discharged by:	
Requirement	Reason	Secretary of State	Wiltshire Council
<p>No part of the authorised development may commence until a communication strategy be submitted and approved, with measurable and accountable outcomes for the mitigation on community identity and resilience impacts.</p>	<p>To ensure the community engagement and the safeguarding of community wellbeing</p>		<p>Yes</p>
<p>No part of the authorised development may commence until a Decommissioning Strategy is submitted and approved, to include mitigations for the impact on community identity and resilience.</p>	<p>To ensure the community engagement and the safeguarding of community wellbeing</p>		<p>Yes</p>

Public Protection		Requirement to be discharged by:	
Requirement	Reason	Secretary of State	Wiltshire Council
Not Required. Once the OCEMP and OEMP issues have been resolved then further conditions will not be necessary.			Yes

Flood Risk and Drainage		Requirement to be discharged by:	
Requirement	Reason	Secretary of State	Wiltshire Council
<p>Detailed Construction Environmental Management Plan (CEMP) No development shall commence until a CEMP: Water and Pollution Control has been submitted to and approved by the LPA. The CEMP shall include:</p> <ul style="list-style-type: none"> (i) phased temporary drainage layouts (swales, cutoff drains, check-dams, settlement tanks) sized to control the 1 in 10-year event with mapped exceedance to safe locations; (ii) wheel-wash locations and maintenance; (iii) bunded fuel storage and designated refuelling zones; (iv) turbidity/oil sheen trigger levels and stop-work thresholds; (v) inspection frequencies, incident response and reporting. 	To secure temporary drainage, pollution prevention, and sediment control measures during construction. This requirement amends and supplements the draft DCO Construction Environmental Management Plan requirement by specifying minimum flood-risk-critical content that must be included within the CEMP.		Yes
<p>Pre- and Post-Construction Exceedance Flow Routing Plan Prior to commencement, a plan showing pre- and post-construction exceedance routes for the 1 in 100-year +</p>	To manage overland flow paths during extreme rainfall events and prevent concentrated runoff.		Yes

Flood Risk and Drainage		Requirement to be discharged by:	
Requirement	Reason	Secretary of State	Wiltshire Council
climate change event shall be submitted to and approved by the LPA, demonstrating that overland flow would be directed away from receptors (dwellings, highways, watercourses) during temporary works and operational phases.			
<p>Horizontal Directional Drilling (HDD) Method Statement and Frac-Out Contingency</p> <p>No trenchless crossing within 20 m of an ordinary watercourse shall commence until an HDD method statement and frac-out contingency plan is has been submitted to and approved in writing by the LPA. The approved details shall confirm how LLFA principles will be applied where ordinary watercourse consent would ordinarily be required (notwithstanding any DCO disapplication and the applicability of Protective Provisions). The authorised works shall thereafter be carried out in accordance with the approved details.</p>	To control the risk of drilling fluid breakout and subsurface migration associated with trenchless crossings near ordinary watercourses, and to prevent contamination of watercourses or groundwater that could result in flood-risk or water-quality impacts.		Yes
<p>Operational Drainage Inspection, Testing and Maintenance Plan</p> <p>Prior to operation of the authorised development, an asset register and Operational Inspection, Testing and Maintenance Plan shall be submitted to and approved in writing by the LPA for all SuDS and sealed and lined drainage systems, including those</p>	To ensure that SuDS and sealed drainage systems are inspected, tested and maintained over the operational lifetime of the development, preventing blockages, system failure and associated localised flood risk.		Yes

Flood Risk and Drainage		Requirement to be discharged by:	
Requirement	Reason	Secretary of State	Wiltshire Council
<p>serving substations and battery energy storage systems. The approved plan shall include details of access points, inspection intervals, isolation valve automatic testing frequency, alarm and fail-safe arrangements, and KPI-based response times for blockages. The drainage systems shall thereafter be operated and maintained in accordance with the approved plan.</p>			
<p>Flood Zone 3b Definition and Compliance Plan Prior to detailed layout approval, the applicant shall map Flood Zone 3b within the Order limits (using best available EA/LLFA guidance) and whether layout, levels, SuDS and access arrangements comply with functional floodplain policy; any assets within or interfacing with 3b must show resilience and no loss of flood storage. This should be submitted to the LPA alongside any application for detailed design consent.</p>	<p>To ensure site layout and operational infrastructure comply with flood risk policy for functional floodplain.</p>		Yes
<p>SuDS Retirement and Decommissioning Drainage Plan At least 12 months before decommissioning of any phase, a plan must be submitted to the LPA for approval identifying every SuDS/sealed system with its end-state (retain/ remove/ backfill), procedures to drain, sample and dispose of residual fluids/liners via licensed facilities, and sequencing of temporary drainage during removal.</p>	<p>To clarify the removal, retention or backfilling of drainage features at decommissioning, and to ensure the safe drainage, sampling and disposal of sealed systems so as to avoid residual flood risk or pollution pathways.</p>		Yes

Flood Risk and Drainage		Requirement to be discharged by:	
Requirement	Reason	Secretary of State	Wiltshire Council
Decommissioning shall thereafter be carried out in accordance with the approved plan.			
<p>Soil Reinstatement Targets and Verification</p> <p>The Decommissioning Plan shall define soil reinstatement performance targets (e.g. bulk density ranges, infiltration rates, surface roughness and vegetation cover), together with a verification regime including field and laboratory testing, to demonstrate recovery of greenfield hydrological performance following decommissioning.</p>	To ensure that soils are reinstated to a standard that restores infiltration capacity and greenfield runoff characteristics, avoiding residual increases in surface water runoff or flood risk following decommissioning.		Yes
<p>Decommissioning Water-Quality Monitoring</p> <p>No part of the authorised development shall be decommissioned until a Decommissioning Water-Quality Monitoring Plan has been submitted to and approved in writing by the LPA. The plan shall specify monitoring locations upstream and downstream of works, parameters to be monitoring (including, but not limited to, total suspended solids, pH and hydrocarbons), monitoring frequency, trigger levels and reporting arrangements. Decommissioning shall thereafter be carried out in accordance with the approved plan, with monitoring results report to the LPA, the Environment Agency and the LLFA.</p>	To evidence that sediment and pollution are effectively controlled during decommissioning, protecting watercourses and groundwater from adverse impacts during asset removal and restoration.		Yes

Flood Risk and Drainage		Requirement to be discharged by:	
Requirement	Reason	Secretary of State	Wiltshire Council
<p>Firewater and Spill Containment (Decommissioning) No part of the authorised development shall be decommissioned until details of firewater and spill containment have been submitted to and approved in writing by the LPA. The approved details shall include capacity calculations demonstrating adequate containment of firewater and spill volumes during dismantling activities, together with details of tested isolation valves, off-take points for removal and disposal, and on-site contingency storage. Decommissioning shall thereafter be carried out in accordance with the approved details.</p>	<p>To ensure that abnormal events during decommissioning, including firewater release or accidental spills, are effectively contained, preventing uncontrolled discharges and associated flood risk or pollution impacts.</p>		Yes
<p>Substation and BESS Containment Performance Prior to operation of any substation or battery energy storage system, evidence demonstrating containment performance shall be submitted to and approved in writing by the LPA. The submitted evidence shall demonstrate that sealed and lined drainage systems and automatic isolation valves at substations and battery energy storage systems are capable of containing the greater of 110% of the largest vessel volume or the design rainfall event until removal, and shall include details of routine function testing and record keeping.</p>	<p>To ensure that substations and battery energy storage systems are designed and operated with adequate containment capacity to prevent uncontrolled release of firewater, fuel or contaminated runoff, thereby avoiding residual flood risk and pollution impacts to land and watercourses.</p>		Yes

Flood Risk and Drainage		Requirement to be discharged by:	
Requirement	Reason	Secretary of State	Wiltshire Council
The authorised development shall thereafter be operated in accordance with the approved containment measures.			
<p>Hydraulic modelling (1D–2D) and exceedance assessment</p> <p>No development shall commence until a single, integrated Hydraulic Modelling and Exceedance Assessment has been submitted to and approved in writing by the LPA. The assessment shall be prepared in accordance with the Environment Agency’s “Using modelling for flood risk assessments” and river modelling technical standards and shall:</p> <p>(a) Provide 2D surface-water modelling for the pre-construction, construction (temporary works), operational and decommissioning states for each PV area (A–E) and hydrologically connected land within the Order limits, together with an appropriate buffer (minimum 100 m), merged into contiguous domains where flow connectivity exists;</p> <p>(b) Include 1D–2D coupled fluvial modelling for all ordinary watercourses within or adjacent to the Order limits, to define Flood Zone 3b (functional floodplain) and interactions with site works;</p> <p>(c) Assess, as a minimum, the 1 in 30-year, 1 in 100-year and 1 in 100-year plus climate</p>	To demonstrate that the authorised development would not alter flood-risk behaviour, including exceedance, and to support confirmation of compliance with functional floodplain and surface water flood-risk policies.		Yes

Flood Risk and Drainage		Requirement to be discharged by:	
Requirement	Reason	Secretary of State	Wiltshire Council
<p>change events, including sensitivity testing for rainfall duration, culvert blockage and ground-condition roughness for pre-works, temporary works and operational states;</p> <p>(d) Demonstrate how exceedance routes are identified and safeguarded away from sensitive receptors (including dwellings, highways, watercourses and Public Rights of Way), and that the proposed drainage and earthworks would not increase flood risk elsewhere;</p> <p>(e) Provide model outputs including depth, velocity, hazard mapping and flow vectors, together with GIS layers; and</p> <p>(f) Include a quality assurance statement demonstrating compliance with Environment Agency modelling standards, together with a Model Review Note responding to Environment Agency and LLFA comments.</p> <p>Where the Applicant demonstrates that a specific parcel of land is hydrologically isolated and does not influence Flood Zone 3b definition or exceedance routing, the LPA may agree a proportionate reduction in model coverage for that parcel.</p>			

Climate Change		Requirement to be discharged by:	
Requirement	Reason	Secretary of State	Wiltshire Council
Development must not commence until the management plans have been approved, to include measures that minimise greenhouse gas emissions, especially during the construction phase, through the Construction Environmental Management Plan, Operational Environmental Management Plan and Decommissioning Strategy, especially around the use of ultra-low emissions vehicles, and embodied carbon.	To reduce GHG emissions as much as possible		Yes
Development must not commence until the management plans have been approved, to include measures relating to recycling of panels. E.g. work with circular economy organisations to ensure recycling of panels and other materials, collaborating on innovative approaches as necessary, working with local organisations and finding local solutions where possible.	Minimise environmental impact, GHG emissions and in particular embodied carbon and improve circularity of materials use.		Yes

Soils and Agriculture		Requirement to be discharged by:	
Requirement	Reason	Secretary of State	Wiltshire Council
No part of the scheme should commence until a pollution incident plan has been submitted to and approved by the local planning authority	To minimise the impact of any pollution incidents		Yes
If during the lifetime of the scheme any of the land that is a part of the scheme is to be used for livestock, then Wiltshire Council would need to be consulted and agree on fencing/protective equipment required. This should be submitted and approved by the local planning authority through the detailed design requirement.	To eliminate any damage that could be caused by livestock during the operational phase to equipment and the general public. This should be incorporated into the initial construction phase.		Yes

Soils and Agriculture		Requirement to be discharged by:	
Requirement	Reason	Secretary of State	Wiltshire Council
No part of the scheme should be started until a comprehensive soil sampling scheme has been submitted to and approved by the local planning authority in writing, to include inspection of subsurface for signs of compaction using test manually dug holes	To ensure the soil is in a fit state to resume agricultural production after decommissioning is completed.		Yes

Arboriculture		Requirement to be discharged by:	
Requirement	Reason	Secretary of State	Wiltshire Council
No demolition, site clearance or development shall commence on site, and; no equipment, machinery or materials shall be brought on to site for the purpose of development, until a comprehensive Arboricultural Method Statement, prepared in accordance with British Standard 5837: 2012: "Trees in Relation to Design, Demolition and Construction - Recommendations"; and detailing all methods and materials proposed to be used for tracks, accesses, associated infrastructure, any aspect of the Solar PV Sites, and any aspect of the cable route corridor, within, or in the instance of tracks and accesses on the periphery of, the RPA of any tree or group, has been submitted to and approved in writing by the Local Planning Authority.	The OAMS submitted with the DCO application documentation contained insufficient information to enable this matter to be considered prior to granting consent and the matter is required to be agreed with the Local Planning Authority before development commences in order that the development is undertaken in an acceptable manner, to enable the Local Planning Authority to ensure the retention of trees, groups, woodlands and hedgerows on and off the site in the interests of visual and ecological amenity.		Yes

Arboriculture		Requirement to be discharged by:	
Requirement	Reason	Secretary of State	Wiltshire Council
No demolition, site clearance or development shall commence on site, and; no equipment, machinery or materials shall be brought on to site for the purpose of development, until a comprehensive Arboricultural Method Statement, prepared in accordance with British Standard 5837: 2012: "Trees in Relation to Design, Demolition and Construction - Recommendations"; and detailing all methods and materials proposed to be used for the installation of each BESS, including root barriers for the prevention of leaching of chemicals, has been submitted to and approved in writing by the Local Planning Authority.	The OAMS submitted with the DCO application documentation contained insufficient information to enable this matter to be considered prior to granting consent and the matter is required to be agreed with the Local Planning Authority before development commences in order that the development is undertaken in an acceptable manner, to enable the Local Planning Authority to ensure the retention of trees, groups, woodlands and hedgerows on and off the site in the interests of visual and ecological amenity.		Yes
No demolition, site clearance or development shall commence on site, and; no equipment, machinery or materials shall be brought on to site for the purpose of development, until comprehensive Tree Protection Plans, prepared in accordance with British Standard 5837: 2012: "Trees in Relation to Design, Demolition and Construction - Recommendations"; detailing the locations and types of protective fencing and ground protection proposed, has been submitted to and approved in writing by the Local Planning Authority. The protective fencing shall be erected in accordance with the approved details. The protective fencing shall remain	The OAMS submitted with the DCO application documentation contained insufficient information to enable this matter to be considered prior to granting consent and the matter is required to be agreed with the Local Planning Authority before development commences in order that the development is undertaken in an acceptable manner, to enable the Local Planning Authority to ensure the retention of trees, groups, woodlands and hedgerows on and off the site in the interests of visual and ecological amenity.		Yes

Arboriculture		Requirement to be discharged by:	
Requirement	Reason	Secretary of State	Wiltshire Council
in place for the entire development phase and until all equipment, machinery and surplus materials have been removed from the site. Such fencing shall not be removed or breached during construction operations.			
No demolition, site clearance or development shall commence on site, and no equipment, machinery or materials shall be brought on to site for the purpose of development, until revised Tree Impacts Plans, prepared in accordance with British Standard 5837: 2012: "Trees in Relation to Design, Demolition and Construction - Recommendations"; labelling all trees, groups, woodlands, and hedgerows within the Order Limits appropriately, and detailing all infrastructure in relation to Lime Down Solar Park, has been submitted to and approved in writing by the Local Planning Authority. (This condition should be added should the plans not be submitted prior to determination)	The Tree Impact Plans submitted with the DCO application documentation demonstrated high-impact construction within the RPA of trees, groups, woodlands, and hedgerows to be retained, without sufficient mitigation to prevent unnecessary harm to said trees, groups, woodlands, and hedgerows. The location and mitigation is required to be agreed with the Local Planning Authority before development commences in order that the development is undertaken in an acceptable manner, to enable the Local Planning Authority to ensure the retention of trees, groups, woodlands and hedgerows on and off the site in the interests of visual and ecological amenity.		Yes

Ecology and Biodiversity		Requirement to be discharged by:	
Requirement	Reason	Secretary of State	Wiltshire Council
1. Compliance with Submitted Documents	For the avoidance of doubt and for the protection, mitigation and		Yes

Ecology and Biodiversity		Requirement to be discharged by:	
Requirement	Reason	Secretary of State	Wiltshire Council
<p>The development will be carried out in <u>strict</u> accordance with the following documents and plans:</p> <ol style="list-style-type: none"> 8. Landscape and Ecology Mitigation Plans (Environmental Statement Volume 2, Figure 3-4-1 to 3-4-5.2). 9. Final Ecological Protection and Mitigation Strategy (EPMS). 10. Hedgerow Removal Plan embedded within and comprising Annex A of the EPMS. 11. Schedule of Protective Ecological Buffers. 12. Habitats Regulations Assessment Report. 13. Final Detailed Landscape and Ecology Management Plan LEMP (LEMP). 14. Final Construction Environmental Management Plan (CEMP). 8. Habitat Management and Monitoring Plan (HMMP). 9. Lighting Strategy (covering construction and operational / maintenance phases). 10. Decommissioning and Restoration Plan / Strategy. <p><i>Note: This is not an exhaustive list and the ExA should include any other technical drawings, and/or relevant sections of reports relating to mitigation they deem appropriate within this DCO requirement if minded to approve the application.</i></p>	enhancement of biodiversity		
<p>2. (Final) Detailed Landscape and Ecology Management Plan LEMP (LEMP)</p> <p>Prior to the start of each phase of construction, a final Landscape and Ecology Management Plan (LEMP) shall be submitted to and approved in writing by the Local Planning Authority. The LEMP will include long</p>	To ensure the long-term management of landscape and ecological features retained and created by the development, for the benefit of visual amenity and biodiversity for the lifetime of the scheme.		Yes

Ecology and Biodiversity		Requirement to be discharged by:	
Requirement	Reason	Secretary of State	Wiltshire Council
<p>term objectives and targets, management responsibilities and maintenance schedules for each ecological feature within the development, together with a mechanism for monitoring success of the management prescriptions, incorporating review and necessary adaptive management in order to attain targets.</p> <p>The LEMP shall be implemented in full and for the lifetime of the development in accordance with the approved details.</p>			
<p>3. (Final) Construction Environmental Management Plan (CEMP) Prior to the commencement of each phase of the works, including demolition, ground works/excavation, site clearance, vegetation clearance and boundary treatment works, a final Construction Environmental Management Plan (CEMP) shall be submitted to the local planning authority for approval in writing. The CEMP shall provide details of the avoidance, mitigation and protective measures to be implemented before and during the construction phase, including but not necessarily limited to, the following:</p> <p>b. Identification of ecological protection areas/buffer zones and tree root protection areas and details of physical means of protection, e.g. exclusion fencing.</p> <p>c. Working method statements for protected/priority species, such as nesting birds and reptiles.</p> <p>d. Mitigation strategies already agreed with the local planning authority prior to determination, such as for great crested newts, dormice or bats; this should comprise the pre-</p>	<p>To ensure adequate protection and mitigation for ecological receptors prior to and during construction, and that works are undertaken in line with current best practice and industry standards and are supervised by a suitably licensed and competent professional ecological consultant where applicable.</p>		<p>Yes</p>

Ecology and Biodiversity		Requirement to be discharged by:	
Requirement	Reason	Secretary of State	Wiltshire Council
<p>construction/construction related elements of strategies only.</p> <p>e. Schedules for activities with specific timing requirements in order to avoid/reduce potential harm to ecological receptors; including details of when a licensed ecologist and/or ecological clerk of works (ECoW) shall be present on site.</p> <p>f. Key personnel, responsibilities and contact details (including Site Manager and ecologist/ECoW). Development shall be carried out in strict accordance with the approved CEMP.</p>			
<p>4. Biodiversity Net Gain (BNG): Habitat Management and Monitoring Plan (HMMP)</p> <p>Prior to the commencement of each phase of the works, a Habitat Management and Monitoring Plan (the HMMP), prepared in accordance with the statutory Biodiversity Gain Plan and including:</p> <p>6. a non-technical summary;</p> <p>7. the roles and responsibilities of the people or organisation(s) delivering the HMMP;</p> <p>8. the planned habitat creation and enhancement works to create or improve habitat to achieve the biodiversity net gain in accordance with the statutory Biodiversity Gain Plan and schedule for implementation;</p> <p>9. the management measures to maintain habitat in accordance with the statutory Biodiversity Gain Plan for a period of 30 years from the completion of development; and</p> <p>10. the monitoring methodology and specification of a Monitoring Pack (to include but not exclusively up</p>	<p>To ensure the development delivers a biodiversity net gain on site in accordance with Schedule 7A of the Town and Country Planning Act 1990.</p>		<p>Yes</p>

Ecology and Biodiversity		Requirement to be discharged by:	
Requirement	Reason	Secretary of State	Wiltshire Council
<p>to date Management Actions Logs, Habitat Condition Assessment Reports, metric calculation; and corresponding post intervention Habitat Map) which shall be submitted to the Local Planning Authority in years 2 (two) 5 (five) 10 (ten) 15 (fifteen) 20 (twenty) and 30 (thirty) of the Maintenance Period, has been submitted to, and approved in writing by, the local planning authority.</p> <p>The created and/or enhanced habitat shall be managed and maintained in accordance with the statutory HMMP at all times thereafter.</p>			
<p>5. (Final) Ecological Protection and Mitigation Strategy (EPMS)</p> <p>Prior to the commencement of each phase of the works, a final Ecological Protection and Mitigation Strategy (EPMS) shall be submitted to and approved in writing by the Local Planning Authority.</p> <p>Development shall be carried out in strict accordance with the approved EPMS.</p>	<p>To ensure adequate protection and mitigation for ecological receptors prior to and during construction and operation, and that works are undertaken in line with current best practice and industry standards and are supervised by a suitably licensed and competent professional ecological consultant where applicable.</p>		Yes
<p>6. Lighting Strategy (covering construction and operational / maintenance phases)</p> <p>In relation to the Cable Route Corridor (CRC) where it coincides with the 4km greater horseshoe bat consultation zone around the Box Mine component area of the Bath and Bradford on Avon Bats Special Area of Conservation (SAC). No external light fixture or fitting will be installed within the application site unless details of existing and proposed new lighting</p>	<p>To avoid illumination of habitat used by bats.</p>		Yes

Ecology and Biodiversity		Requirement to be discharged by:	
Requirement	Reason	Secretary of State	Wiltshire Council
<p>have been submitted to and approved by the Local Planning Authority in writing. The submitted details will demonstrate how the proposed lighting will impact on bat habitat compared to the existing situation.</p> <p>The plans will be in accordance with the appropriate Environmental Zone standards set out by the Institution of Lighting Professionals (ILP) Guidance Notes on the Avoidance of Obtrusive Light (GN 01/2021) and Guidance note GN08/23 “Bats and artificial lighting at night”, issued by the Bat Conservation Trust and Institution of Lighting Professionals.</p>			
<p>7. Decommissioning and Restoration Plan / Strategy</p> <p>Not later than 12 months before each phase of the planned decommissioning of the solar park a scheme for decommissioning and the restoration of the site must be submitted to the Local Planning Authority and approved in writing. The scheme will be based on update ecological surveys and must make provision for the removal of the solar arrays and the associated above ground structures, equipment and foundations, to a depth of at least one metre below finished ground level. The scheme must include the management and timing of any works; a traffic management plan; an environmental management plan including measures to protect wildlife.</p>	<p>To ensure adequate protection and mitigation for ecological receptors during the decommissioning phase and to ensure compliance with legislation in respect of protected habitats and species, planning policy and best practice</p>		Yes

Minerals and Waste		Requirement to be discharged by:	
Requirement	Reason	Secretary of State	Wiltshire Council

Construction Environmental Management Plan (CEMP) - As included within the draft DCO [APP-016]	To secure the relevant mitigation measures.		Yes
Operational Environmental Management Plan (OEMP) - As included within the draft DCO [APP-016]	To ensure the sustainable management of waste.		Yes
Site Waste Management Plan (SWMP) - As included within the draft DCO [APP-016]	To ensure waste is managed in accordance with regulatory and good practice requirements.		Yes
Decommissioning Strategy (DS) - As included within the draft DCO [APP-016]	To secure removal of plant and structures at the end of the project.		Yes

Appendix C – Consolidated List of Suggested Section 106 agreements

Public Rights of Way	Reason (including justification for why a condition is not adequate)
<p>A section 106 contribution of £20,000 per annum index linked should be paid annually.</p>	<p>This contribution is required to improve Public Rights of Way outside of the red line boundary which will receive additional usage from members of the public wishing to enjoy the PRoW network within a more traditional landscape setting. The sum is requested so that new routes can be created to help to link up PRoW. To divert PRoW to provide routes which reduce conflict between land managers and the public. This contribution would allow for those most affected by the development to have a PRoW network which could still meet their needs and be accessible to as many users as possible. It is suggested that the money is to be spent on public footpaths within 2km of the red line boundary of Lime Down A,B,C,D and E and 3km for other PRoW. After 20 years this is to be expanded to cover footpaths with 3km and other PRoW within 4km after 40 years this area should be increased to cover footpaths within 4km and other PRoW within 5km. If the development time scale is extended then the contributions should continue' on the same basis as they had been and a further increase of 1km per 10 years for the area where the funding can be spent.</p>

Flood Risk and Drainage	Reason (including justification for why a condition is not adequate)
<p>None identified.</p>	<p>All flood risk and drainage mitigation required to address the impacts of the authorised development can be secured, enforced and maintained through Development Consent Order Requirements and planning-style conditions. No matters have been identified that require a Section 106 planning obligation in order to achieve acceptable flood-risk or drainage outcomes.</p>

Ecology and Biodiversity	Reason (including justification for why a condition is not adequate)
<p>Developer contribution to be secured by means of a S106 for the LPA to monitor the delivery of significant on-site BNG gains over a period of 30 years. The S106 should reflect the HMMP which should set out how it will be monitored and the frequency of reporting from the applicant to the LPA.</p>	<p>The LPA will be responsible for monitoring over the 30 year period.</p> <p><u>Explanatory Note:</u> Calculation of the developer contribution is considered to constitute a matter for the Examination, and potentially for an Issue Specific Hearing, should one be held in relation to ecology and biodiversity.</p> <p>This is because Wiltshire Council's Schedule of Fees and Charges, which sets out standard fees for monitoring on-site Biodiversity Net Gain, are not applicable to complex, phased developments. Instead, developments of that type necessitate calculation of a bespoke monitoring fee that is index linked and secured by means of a legal agreement.</p> <p>In addition, for complex phased developments delivering significant on-site enhancements the council would prefer submission of a habitat management and monitoring plan (HMMP) with the application in accordance with guidance from DEFRA (Creating a habitat management and monitoring plan for BNG - GOV.UK). The HMMP should provide details that would serve to inform the calculation of the bespoke monitoring fee. This DCO application has not been accompanied by a HMMP, however, and as such it is deemed this matter will need to be resolved through the Examination process.</p> <p>It is therefore considered that to calculate the developer contribution at this juncture, and in advance of advice from the Examining Authority, would be premature</p>
<p>Developer contribution to be secured towards the LPA monitoring the measures set out in the LEMP, which should cover the construction and operational phases.</p>	<p>The LPA will be responsible for monitoring over the lifetime of the Scheme, which is proposed to be at least 60 years.</p> <p><u>Explanatory Note:</u> Calculation of the developer contribution is considered to constitute a matter for the Examination, and potentially for an Issue Specific Hearing, should one be held in relation to ecology and biodiversity.</p>

Ecology and Biodiversity	Reason (including justification for why a condition is not adequate)
	<p>Although Wiltshire Council’s Schedule of Fees and Charges stipulates an hourly rate used to calculate developer contributions for the monitoring of habitat and species mitigation delivery, given that the mitigation strategy requirements for this DCO application may be subject to change through the Examination process, it is deemed prudent for the bespoke developer contribution amount to be determined once the mitigation strategies and ecological monitoring matters detailed in the Outline Landscape and Ecological Management Plan [APP-283] have been agreed. The bespoke monitoring fee will need to be index linked and secured by means of a legal agreement.</p> <p>Furthermore, it is considered a matter to be resolved through the Examination on account of there being a number of outstanding issues regarding the Scheme to be addressed through the Examination process, which in turn would facilitate determination of the developer contribution. It is therefore considered that to calculate the developer contribution at this juncture, and in advance of advice from the Examining Authority, would be premature.</p>

